

**Proposed Key Dates for Calendar Year 2016¹:
QHP Certification in the Federally-facilitated Marketplaces²; Rate Review;
Risk Adjustment and Reinsurance**

QHP Certification³

Activity		Dates
QHP Application Submission and Review Process	Initial FFM QHP Application Submission Window ⁴	4/11/2016 – 5/11/2016
	First SERFF Data Transfer Deadline for States Performing Plan Management	5/11/2016
	CMS Review of Initial QHP Application Submissions Received as of May 11	5/12/2016 – 6/10/2016
	First Correction Notice Sent to Issuers	6/15/2016 – 6/16/2016
	Deadline for Submission of Revised QHP Data for Re-review; Second SERFF Data Transfer Deadline for States Performing Plan Management	6/30/2016
	CMS Review of Revised QHP Application Submissions Received as of June 30	7/1/2016 – 8/2/2016
	Second Correction Notice Sent to Issuers	8/8/2016 – 8/9/2016
	Final Deadline for Submission of QHP Data; Deadline for All Risk Pools with QHPs to be in a final status in the URR System ^{5,6} ;	8/23/2016
	Final CMS Review of Revised QHP Application Submissions Received as of August 23	8/24/2016 – 9/9/2016
QHP Agreement/Final Certification	Certification Notices Sent to Issuers	9/15/2016 – 9/16/2016
	Agreements Signed by Issuers and Returned to CMS with Final Plan List	9/19/2016 – 9/23/2016
	Validation Notice Confirming Final Plan List and Countersigned Agreements Sent to Issuers	10/3/2016 – 10/4/2016
Open Enrollment		11/1/2016 – 1/31/2017

¹ This document summarizes key dates for calendar year 2016 regarding some activities and policies that are outlined in other documents that have not yet been finalized and are open to comment by interested parties, such as the *Draft 2017 Letter to Issuers in the Federally-facilitated Marketplaces* (December 23, 2015), the *Patient Protection and Affordable Care Act; HHS Notice of Benefit and Payment Parameters for 2017; Proposed Rule*, 80 Federal Register 75488 (December 2, 2015), and the *DRAFT Bulletin: Timing of Submission and Posting of Rate Filing Justifications for the 2016 Filing Year for Single Risk Pool Coverage Effective on or after January 1, 2017* (December 23, 2015). CMS is not soliciting additional comments on the substance of the underlying policies or the proposed key dates through release of this document.

² Includes QHPs in States Performing Plan Management Functions

³ QHP certification information from the *Draft 2017 Letter to Issuers in the Federally-facilitated Marketplaces* (December 23, 2015), available at: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Health_Insurance_Marketplaces.

⁴ URRT and Form Filing submissions to CMS in States in which CMS is either the Effective Rate Reviewer or direct enforcer of the Affordable Care Act federal reforms follow the same Initial Submission Window and Deadline as the QHP Initial FFM QHP Application Submission Window. This submission deadline applies to URRT and Form Filing submissions for single risk pool coverage (including QHPs and non-QHPs).

⁵ There are three final submission statuses in HIOS. All submissions that do not have any rate increases subject to review (rate increase less than 10%) must be in a status of "Rate Filing Accepted." For submissions with rate increases that are subject to review (rate increase of 10% or greater), the submission must be in a status of "Review Complete" if the rate increase received a determination of "not unreasonable," or in a status of "Final Justification Submitted" if the rate increase received a determination of "unreasonable" and the issuer has submitted the final justification.

⁶ All risk pools that only have non-QHPs must be in a final status in the URR system by October 7, 2016.

Rate Review for Single Risk Pool Plans^{7,8}

Activity	Dates
Initial submission deadline for issuers to submit QHP and non-QHP rate filings into URR Module (unless a state sets an earlier deadline) ⁹	5/11/16
Initial proposed rate increases available for consumers to review on https://ratereview.healthcare.gov ¹⁰	5/25/16
Deadline for all rate filings in the single risk pool to be in a final status in the URR system	8/23/16
Deadline for all rate filings that only have non-QHPs to be in a final status in the URR system	10/7/16
Target date to post Public Use File with final rate data for QHPs and non-QHPs	11/1/16

Risk Adjustment and Reinsurance for Benefit Year 2015¹¹

Activity	Dates
First Bifurcated or Combined Reinsurance Contribution Amount Due	1/15/2016
Interim Reinsurance Payment ¹²	3/2016
Deadline for Submission of Final Risk Adjustment/Reinsurance Data ¹³	5/2/2016
Risk Adjustment and Reinsurance Summary Report Released	6/30/2016
Remittance and Collection of Risk Adjustment and Reinsurance Payments and Charges	Begins 7/2016
Second Bifurcated Reinsurance Contribution Amount Due	11/15/2016

⁷ Rate review dates from the *Draft 2017 Letter to Issuers in the Federally-Facilitated Marketplace* (December 23, 2015), at: [https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Health Insurance Marketplaces](https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Health%20Insurance%20Marketplaces) and DRAFT Bulletin: Timing of Submission and Posting of Rate Filing Justifications for the 2016 Filing Year for Single Risk Pool Coverage Effective on or after January 1, 2017 (December 23, 2015), at [https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Review of Insurance Rates](https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Review%20of%20Insurance%20Rates).

⁸ The term “single risk pool plan” is used to describe non-grandfathered health insurance coverage in the individual or small group (or merged) market that is subject to all of the single risk pool provisions at 45 CFR 156.80 and required to submit rate information using the Unified Rate Review Template.

⁹ As proposed in the 2017 Payment Notice Proposed Rule, this deadline would extend beyond rate increases and would also include single risk pool coverage that experiences no rate changes, rate decreases, as well as rates for new single risk pool coverage.

¹⁰ As proposed in the 2017 Payment Notice Proposed Rule, CMS would post rate filing information for all single risk pool coverage proposed rate increases (not just those subject to review).

¹¹ Risk Adjustment, Reinsurance, and Risk Corridors dates from the regulations at 45 CFR Part 153.

¹² <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/Downloads/Early-Reinsurance-Guidance-Final-10-09-15.pdf>.

¹³ See FAQ 14472, available at www.regtap.info.