Filing Medical Loss Ratio Annual Reports through HIOS
Agenda

- Welcome
- Overview
- System Walkthrough
- Next Steps and Wrap up
- Q&A
WELCOME
Objective

- Provide general information on the MLR reporting process.
- Provide specific steps for filing your MLR reports.

Approximately 45 minutes session with Q&A at the end.

Please hold your questions until the end.
OVERVIEW
The Affordable Care Act requires health insurance issuers to publicly report data on major categories of spending of policyholder premium, including the portion of premium revenues spent on clinical services to enrollees, quality improvement activities, and on all other non-claims costs. The amount of premium spent on clinical services and quality is known as the Medical Loss Ratio (MLR).

The Center for Consumer Information and Insurance Oversight (CCIIO) Medical Loss Ratio (MLR) division has been charged with collecting the MLR data.

The Health Information Oversight System (HIOS) Medical Loss Ratio Reporting System (MLR module) has been identified as the system of record to support the collection of the MLR data.

The MLR data will be collected using an Excel template (MLR-A Template).

The submission window will open on May 1, 2014.

Submissions with data regarding 2013 experience are due by June 1, 2014.
SYSTEM WALKTHROUGH
The MLR regulation requires that MLR data be reported by each Company at the issuer, state and market level.

- For the purposes of MLR reporting through HIOS:
  - **Company** is the legal entity licensed to sell health insurance products in one or more States. If filing annual financial reports with the NAIC, a company would have an associated NAIC company code. In HIOS, a company is comprised of Issuers.
  - **Issuer** is the entity selling products in a specific State, in one or more market sectors or type of experience (e.g., individual, small group, large group, mini-med experience, expatriate experience, student health plans).
  - Each reporting year, the number of issuers associated with a specific company, along with the States and market sectors in which they sell products, may vary.
The MLR Reporting Process

The MLR reporting process involves the following steps:

1. Register for the HIOS MLR module.
2. Confirm company-issuer associations.
3. Download MLR-A templates.
5. Upload completed MLR-A templates.
6. Attest to accuracy of uploaded MLR data and supplemental materials.
REGISTRATION
Step 1 – Register for the HIOS MLR module
The Health Insurance and Oversight System (HIOS) has been integrated with the Enterprise Portal and EIDM:

- **CMS Enterprise Portal**: Enterprise web portal for accessing CMS systems. Various CMS systems will be integrated with the portal in the coming months.

- **Enterprise Identity Management System (EIDM)**: EIDM provides Authentication and Authorization capabilities and is tightly integrated with the CMS portal.
  - Authentication (establish who a person is).
  - Authorization (granting permissions to access modules, pages, data, etc.)

- **Multi Factor Authentication (MFA)**: Multi Factor Authentication is a type of security authentication which requires users to verify their identity. It includes password verification as well as other means, such as a security token, to be provided in order to access the system.

- Users will need to go to the CMS Enterprise Portal at [https://portal.cms.gov/](https://portal.cms.gov/) to access HIOS.
Users can be either existing HIOS users or new users of the system:

- All existing HIOS users can log in with their EIDM credentials.
- New HIOS users need to register in EIDM and obtain an EIDM User ID and Password.

In order to gain access to the HIOS MLR module, all users must follow the below steps:

- Users will need to access the CMS Portal using an EIDM User ID and Password.
- Users will access HIOS.
- Users will request access to the HIOS MLR module and their associated user role.

**Note:** Each user must request their individual user roles for each company.

All existing HIOS users will retain their existing HIOS user roles and are not required to submit another user role request.
EIDM Login for Existing HIOS Users

Users will log into the Enterprise Portal with their EIDM Credentials.
New Users

- New HIOS users will need to complete the following steps to access HIOS:
  - Register for an EIDM account.
  - Request access to HIOS in the CMS Enterprise Portal.
  - Register a smartphone or computer for multi-factor authentication.
    - For MFA code details, please contact the Exchange Operations Support Center (XOSC)
  - Register organization if it is not currently registered in HIOS (optional).
  - Request access to required roles in HIOS (optional) (example – MLR Uploader, MLR CEO Attester).
New users will navigate to the Enterprise Portal to start the registration process.
Complete the remaining steps to create your CMS - HIOS User account.
EIDM Account Registration for New Users

Once the user fills in the required information and selects ‘Submit’, the request will be sent for approval.

The users will receive an email notification when the user account has been approved.
Accessing HIOS in the Enterprise Portal

Users that have registered in EIDM, registered in HIOS, and acquired access to HIOS in the portal will be directed to the My Portal landing page. Clicking the ‘HIOS’ tab will open the HIOS landing page.
Self Registration for New HIOS Users

Select the “Register for New Account “ link in the middle of the HIOS Sign-In page.
Self Registration for New HIOS Users

Complete the Self Registration page.

Request HIOS Account

Please note that you are applying for access to the Health Insurance Oversight System (HIOS). If you have any questions, please contact the HIOS Helpdesk at Phone: 1-877-343-6507 or Email: insuranceoversight@hhs.gov.

(*) Indicates a required field

<table>
<thead>
<tr>
<th>Title (Name):</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>*First Name:</td>
<td></td>
</tr>
<tr>
<td>Middle Name:</td>
<td></td>
</tr>
<tr>
<td>*Last Name:</td>
<td></td>
</tr>
<tr>
<td>Suffix:</td>
<td></td>
</tr>
<tr>
<td>*Job Title:</td>
<td></td>
</tr>
<tr>
<td>*Organization Name:</td>
<td></td>
</tr>
<tr>
<td>*Email Address:</td>
<td></td>
</tr>
<tr>
<td>Phone Type:</td>
<td></td>
</tr>
<tr>
<td>*Phone: (Format: 123-456-7890)</td>
<td></td>
</tr>
<tr>
<td>Phone Ext:</td>
<td></td>
</tr>
<tr>
<td>Address Type:</td>
<td></td>
</tr>
<tr>
<td>Address Line 1:</td>
<td></td>
</tr>
<tr>
<td>Address Line 2:</td>
<td></td>
</tr>
<tr>
<td>City:</td>
<td></td>
</tr>
<tr>
<td>State:</td>
<td></td>
</tr>
<tr>
<td>ZIP code:</td>
<td></td>
</tr>
</tbody>
</table>

[Submit]
Self Registration for New HIOS Users

- Once the user fills in the required information and selects ‘Submit’, the request will be sent for approval.

- The users will receive an email notification when the user account has been approved.
Access HIOS Home Page
Registering a New Company In HIOS
Step 1: Register the Organization in HIOS

- To determine if the company is already registered in HIOS, search by the company’s Federal Employer Identification Number (EIN).

- If the company does not already exist in HIOS, users will need to register their company.

- All registration requests are reviewed prior to approval.

- If the company already exists in HIOS, users may proceed directly to Registration Overview – Step 2.
Click on ‘Manage an Organization’ tab on the HIOS homepage.
Search by Federal EIN

Type the Federal EIN of your company in the textbox and click the 'Search' button.
If your company’s Federal EIN is not registered in HIOS, the following message will be displayed:

“No Organization Found”.

To register a new company, select if your primary business is health coverage and click the ‘Create Organization’ button.
Register New HIOS Company

- Fill in the following required information to register a new company:
  - Organization Legal Name
  - Incorporated State
  - Domiciliary Address

- While not mandatory, provide your organization’s NAIC Group Code and Group Name, if applicable, in the respective fields.

- Click the ‘Review/Continue’ button to review your company’s information before submitting the request to register a new company.
Review your company’s information and click the ‘Submit’ button to submit your request for approval.

If changes are required, click the ‘Back’ button to make any changes.
After the request to register a new company has been submitted, the user will receive an email notification confirming the approval for the submitted request.

![New Company Confirmation](image)
User Role Management
Step 2: Determine MLR user role and request access to the company.

- Users will need to determine their user role and identify the company they need access to. There are six different MLR user roles.
  - In the event a user needs to update their current MLR user role to another user role, they will need to contact Exchange Operations Support Center (XOSC) to remove current user role.
  - Once the current user role has been removed, the user can proceed with requesting the new user role.
The MLR module requires six types of users: ‘Uploader’, ‘Back-up Uploader’, ‘CEO Attester’, ‘CEO Attester Back-up’, ‘CFO Attester’ and ‘CFO Attester Back-up’. A user has access to functionality within the module based on the roles associated to their user name.

The following is a brief description of the six user roles within the MLR module:

- **Uploader** – This user is responsible for uploading the MLR-A Templates populated with MLR data through the HIOS MLR module.
- **Back-up Uploader** – This user is responsible for uploading the MLR-A Templates if the primary Uploader is unavailable.
- **CEO Attester** – This user is responsible for attesting to the accuracy and completeness of the MLR data and supplemental materials submitted.
- **CEO Attester Back-up** – This user is responsible for attesting to the accuracy and completeness of the MLR data and supplemental materials submitted, if the CEO is unavailable to attest.
- **CFO Attester** – This user is responsible for attesting to the accuracy and completeness of the MLR data and supplemental materials submitted.
- **CFO Attester Back-up** – This user is responsible for attesting to the accuracy and completeness of the MLR data and supplemental materials submitted, if the CFO is unavailable to attest.
Step 2 (Continued)

- If requesting the Uploader, CEO Attester or CFO Attester role, users will need to identify the company they wish to be granted access to.

- Users can only have access to one user role at a time.

- Each company must ensure an Uploader, CEO Attester, CFO Attester and their back-ups have access to HIOS.
Click the ‘Role Management’ tab on the HIOS Homepage.
Select Role

- Select the module as ‘Medical Loss Ratio Data Collection System (MLR)’ from the dropdown.

- Select Requested Role as ‘Company’.

- You may select one of the following user roles from the User Type dropdown:
  - Uploader
  - CEO Attester
  - CFO Attester

- You may select the User Sub-Type as ‘Primary’ or ‘Back-up’.

- After the selections have been completed, click the ‘Continue’ button.
Enter your company’s Federal EIN you wish to request access to in the textbox and click the ‘Search’ button.
Once your company has been found, click the ‘Review/Continue’ button to review your new role request.
Request Role – Review

- Review your selections and click the ‘Submit’ button to submit the new role request for approval.

- If changes are required, click the ‘Back’ button to make any changes.
Once the role request has been submitted for approval and has been approved, you will receive an email notification.
Registering a New Issuer in HIOS
If the Issuer is not already registered in HIOS, users will first need to register the Issuer in HIOS. To register a new Issuer in HIOS, please follow the below steps:

- Click the ‘Manage an Organization’ tab on the HIOS Homepage.
Search for your company by using the company’s FEIN.

Any issuers already associated to your company will be displayed under the Issuers section.

To add new issuers, click the ‘Add Issuer’ button.
Register New Issuer

- Fill in the required issuer information:
  - Registered State
  - Market Type and Line of Business
  - Domiciliary Address

- Click the ‘Save and Add Another Issuer’ button to submit and/or add more than one issuer.
Submit Issuer Request

Once the new issuer(s) are ready for submission, click the ‘Submit’ button.
New Issuer Confirmation

After the request to register the issuer(s) has been submitted, the user will receive an email notification with the new HIOS Issuer ID. Please save a copy for your reference.
To access the MLR module, click the ‘Medical Loss Ratio Data Collection System (MLR)’ tab on the HIOS homepage.
Health Insurance Oversight System
Medical Loss Ratio Data Collection System

Friday, March 15, 2013
HIOS MAIN PAGE HOME FAQ CONTACT US SIGN OUT

Company/Issuer Associations Download Templates Upload MLR Annual Form Upload Supplemental Materials View Uploaded Data

Announcements
Welcome to Medical Loss Ratio! The Health Insurance Oversight System (HIOS) provides Issuers with the capability to submit requested MLR data via online submission for review by HHS/CCIIO (Department of Health and Human Services /Center for Consumer Information and Insurance Oversight) to determine if the MLR is within acceptable thresholds. The following submission windows time periods are defined below:

Related Links
- MLR Website
- MLR Instructions Document [opens in .pdf format, 199.9KB]
The MLR reporting process involves the following steps:

Step 1 – Register for the HIOS MLR module.
Step 2 – Confirm company-issuer associations.
Step 3 – Download MLR-A templates.
Step 4 – Populate MLR-A templates.
Step 5 – Upload completed MLR-A templates.
Step 6 – Attest to accuracy of uploaded MLR data and supplemental materials.
CONFIRMATION
Step 2 – Confirm Company-Issuer Associations
Every company will need to confirm the list of its associated issuers for which the company will report MLR data for the reporting year (i.e., for which States it will be reporting).

HIOS will utilize the list of confirmed issuers to generate an MLR-A template for each issuer, with the header pre-populated with the company and issuer information (e.g., HIOS ID, FEIN, Company Name, etc.).

The list of confirmed issuers will also be utilized to verify that we receive completed MLR-A templates for all issuers expected to be included in the report.

You will not be able to download the pre-populated MLR-A templates until you confirm the associations.
How to Confirm Company-Issuer Associations

- Select the “Company/Issuer Association” tab.
- Select the “Company”.
- Select the “Reporting Year”.
- Click “View Associations”.
- Confirm the list of issuers by clicking “Confirm” OR
- Update the pre-populated **MLR Company-Issuer Association Form** to add or remove any issuers.
- Upload the updated form back to the MLR module.
- Indicate if your company has only a small closed block of business as described in the 2013 MLR Report Instructions.
- Indicate your company’s federal tax exempt status, as established by the Internal Revenue Services.
**MLR Company-Issuer Association Form Example**

---

### MLR Company-Issuer Association Form

Please review all issuer information, and make updates if necessary, for the MLR module of the Health Insurance Oversight System (HIOS). If updates to the company details displayed below are necessary, refer to HIOS Portal to edit the details, by selecting the 'Manage an Organization' link. Please note the updated company details will only be reflected once the MLR Company-Issuer Association Form is downloaded again.

Note: Asterisk (*) denotes a required field.

<table>
<thead>
<tr>
<th>FEIN: 23123123</th>
<th>A.M. Best Number: 12345</th>
<th>Domiciliary Address Line 1: 123 Street</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name: Company 123</td>
<td>NAIC Company Code: 12345</td>
<td>Domiciliary Address Line 2:</td>
</tr>
<tr>
<td>Not-for-Profit?: Yes</td>
<td>NAIC Group Code:</td>
<td>Domiciliary City: Fairfax</td>
</tr>
<tr>
<td>DBA / Marketing Name: Company 123</td>
<td>NAIC Group Name: Company ABCD</td>
<td>Domiciliary State: Virginia</td>
</tr>
<tr>
<td>Domiciliary Zip: 22124</td>
<td>Domiciliary Zip Plus 4:</td>
<td></td>
</tr>
</tbody>
</table>

---

Please complete this portion of the MLR Company-Issuer Association Form to do either of the following within the MLR module of the Health Insurance Oversight System (HIOS):

- To add an Issuer-to-Company association, enter the existing HIOS Issuer ID and State. Please refer to HIOS Portal for the appropriate HIOS Issuer ID, by selecting 'Manage an Organization' link.

- To remove an existing Issuer-to-Company association, select "Delete" in the Action column.

- To keep an existing Issuer-to-Company association unchanged, please leave the row unchanged.

- Any changes to the Individual, Small Group, or Large Group health insurance coverage fields on this Form will not impact any other HIOS modules (e.g. PlanFinder, Rate Review, etc.).

---

<table>
<thead>
<tr>
<th>HIOS Issuer ID</th>
<th>State</th>
<th>Health Insurance Coverage</th>
<th>Mini-Med</th>
<th>Expatriate</th>
<th>Student Health</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 27271</td>
<td>VT</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>2 36486</td>
<td>MA</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The MLR reporting process consists of the following steps:

Step 1 – Register for the HIOS MLR module.
Step 2 – Confirm company-issuer associations.
Step 3 – Download MLR-A templates.
Step 4 – Populate MLR-A templates.
Step 5 – Upload completed MLR-A templates.
Step 6 – Attest to accuracy of uploaded MLR data and supplemental materials.
DOWNLOADING

Step 3 – Download MLR-A Templates
Overview of Downloading MLR-A Templates

- Each company will have access to a set of MLR-A template files for each issuer with pre-populated header information, as well as an MLR-A template for the company’s national Grand Total numbers.

- The MLR module will generate a zip file containing all MLR-A template files for the selected company and MLR reporting year.

- The zip file will only become available for download after company-issuer associations have been confirmed.
How to Download MLR-A Templates

- Log into the HIOS MLR module.
- Select the “Download Templates” tab.
- Select the “Company”.
- Select the “Reporting Year”.
- Click “Download Files”.
- The MLR module will generate a zip file containing pre-populated MLR-A Templates (separate Excel files for each State of operation, plus one Excel file for the Grand Total).
- Extract the contents of the zip file into a folder on your computer.
How to Download MLR-A Templates (screenshot)
The MLR reporting process consists of the following steps:

Step 1 – Register for the HIOS MLR module.
Step 2 – Confirm company-issuer associations.
Step 3 – Download MLR-A templates.
Step 4 – Populate MLR-A templates.
Step 5 – Upload completed MLR-A templates.
Step 6 – Attest to accuracy of uploaded MLR data and supplemental materials.
Step 4 – Populate MLR-A Templates
The MLR-A template was developed to collect the data elements necessary to calculate issuers’ MLRs and rebates. You will find that the MLR-A template is structurally similar to the NAIC Supplemental Health Care Exhibit.
You should populate all cells applicable to your block of business:

- **White** cells indicate that data entry by the user is permitted.
- **Pink** cells indicate that no data entry is permitted.
- **Gray** cells indicate that no data entry is permitted. Entering data in the gray cells will result in an upload failure.
- **Blue** cells indicate that a calculation by the issuer is required.

### Table: MLR-A Template

<table>
<thead>
<tr>
<th>Group Affiliation</th>
<th>Federal ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Test User 3000</td>
<td>2343404203</td>
</tr>
<tr>
<td>Company Name</td>
<td>A.M. Best Number</td>
</tr>
<tr>
<td>DBA/Marketing Name</td>
<td>Test User 3000</td>
</tr>
<tr>
<td>Address</td>
<td>12001 East Lincs Circle, Willow Grove, PA 18701</td>
</tr>
</tbody>
</table>

#### Part 1: Summary of Data

<table>
<thead>
<tr>
<th>NAIC Group Code</th>
<th>NAIC Company Code</th>
<th>Domiciliary State</th>
</tr>
</thead>
<tbody>
<tr>
<td>2343404203</td>
<td>2343404204</td>
<td>Pennsylvania</td>
</tr>
</tbody>
</table>

#### Part 2: Total Premium Income

<table>
<thead>
<tr>
<th>NAIC</th>
<th>Total as of 12/31/12</th>
<th>Total as of 3/31/13</th>
<th>Dual Contract (Excl. in 3/31/13)</th>
<th>Deferred FY1 (Add)</th>
<th>Deferred CY (B)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pt 1, Ln 1.1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pt 1, Ln 1.2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pt 1, Ln 1.9</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pt 1, Ln 1.10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pt 1, Ln 1.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Part 3: Summary of Claims

<table>
<thead>
<tr>
<th>NAIC</th>
<th>Total as of 12/31/12</th>
<th>Total as of 3/31/13</th>
<th>Dual Contract (Excl. in 3/31/13)</th>
<th>Deferred FY1 (Add)</th>
<th>Deferred CY (B)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pt 1, Ln 1.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pt 1, Ln 2.2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pt 1, Ln 2.3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pt 1, Ln 2.4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>NAIC</th>
<th>Total as of 12/31/12</th>
<th>Total as of 3/31/13</th>
<th>Dual Contract (Excl. in 3/31/13)</th>
<th>Deferred FY1 (Add)</th>
<th>Deferred CY (B)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pt 1, Ln 1.1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pt 1, Ln 1.2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
How to populate the MLR-A Template

- You can copy and paste over blocks of data that do not contain pink or gray cells in the MLR-A template.

- The data entered on the Grand Total MLR-A template should be an aggregate of the data for all states. Data for experience that is to be reported only at the national level (Expatriate and Student Health Plan) should be entered only on the Grand Total MLR-A template.

- Save the completed MLR-A template file for upload to the MLR module.
The MLR Reporting Process

The MLR reporting process consists of the following steps:

Step 1 – Register for the HIOS MLR module.
Step 2 – Confirm company-issuer associations.
Step 3 – Download MLR-A templates.
Step 4 – Populate MLR-A templates.
**Step 5 – Upload completed MLR-A templates.**
Step 6 – Attest to accuracy of the uploaded MLR data and supplemental materials.
UPLOADING

Step 5 – Upload completed MLR-A Templates
You must combine all completed MLR-A templates into a single zip file:

- **CORRECT:** Open the folder. Select all Excel files. Right-click on the selected files, choose “WinZip” and “Add to Zip file…” option, and type a file name at the end of the directory.

- **Note:** No spaces are allowed in the zip file name.

- **INCORRECT:** Do NOT zip the files at the folder level. Files will fail to upload.
How to Upload the Zip File

- Select the “Upload MLR Annual Form” tab.
- Select the “Company”.
- Select the “Reporting Year”.
- Click “Browse” and select the zip file you created.
- Click “Upload File”.
  - **Note**: No spaces are allowed in the zip file name.
- The system will indicate that the MLR-A data has been uploaded, pending validation checks.

![Upload MLR Annual Form](image-url)
How to Upload Supplemental Materials

- Companies may submit supplemental materials to justify the data reported on any of the MLR-A templates.
- Submitting supplemental materials is optional and is not required for attestation to the accuracy of the MLR submission.
- You must upload the MLR-A templates for the company and the MLR reporting year before uploading supplemental materials.
- Note: No spaces are allowed in the supplemental material file names.
- Only PDF and MS Word documents are allowed.
How to Upload Supplemental Materials

- Select the “Upload Supplemental Materials” tab.
- Select the “Company”.
- Select the “Reporting Year”.
- Click “Browse” and select the supplemental material files for upload.
- Click “Upload File(s)”. 
All identified Uploaders and Attesters will receive a confirmation email once the zip file has been uploaded successfully. The email will identify any validation warnings.

If the upload fails, the identified Uploaders will receive an email indicating the reasons why the upload has failed.

Once successfully uploaded, the MLR data will be ready for attestation.
The MLR Reporting Process

The MLR reporting process involves the following steps:

Step 1 – Register for the HIOS MLR module.
Step 2 – Confirm company-issuer associations.
Step 3 – Download MLR-A templates.
Step 4 – Populate MLR-A templates.
Step 5 – Upload completed MLR-A templates.
Step 6 – Attest to accuracy of the uploaded MLR data and supplemental materials.
ATTESTATION

Step 6 – Attest to accuracy of the uploaded MLR data and supplemental materials
HIOS will notify Attesters by email once the MLR data have been uploaded and is ready for attestation.

If the upload generated validation warnings, the Attesters and Uploaders will need to determine if the data submitted is valid. If so, the Attesters should proceed with the attestation process.

The CEO Attester and CFO Attester must both attest to accuracy of the uploaded MLR data and supplemental materials in order for the filing to be complete.
How to Attest

- Log into the HIOS MLR module.
- Select the “Attestation” tab.
- Select the “Company”.
- Select the “Reporting Year”.
- Click “View Data”.
- Select the checkbox that indicates that you attest to the accuracy of the MLR data.
- Click “Save Attestation”.

Supplemental Materials
No supplemental materials have been uploaded.
The MLR Reporting Process

To recap: to file your MLR data, you will need to:

- Step 1 – Register for the HIOS MLR module
- Step 2 – Confirm company-issuer associations
- Step 3 – Download MLR-A templates
- Step 4 – Populate MLR-A submission
- Step 5 – Upload MLR-A submission
- Step 6 – Attest to accuracy of the uploaded MLR data and supplemental materials
If you have additional questions after this training, you can use any of the following:

- Issuer MLR Reporting Form Q&A calls:
  - CCIIO will address questions about the 2013 MLR reporting form weekly, beginning April 17 through May 29, from 2 to 3pm (EDT).

- Email
  - MLR email box (MLRQuestions@cms.hhs.gov – policy related matters).
  - Exchange Operations Support Center (XOSC) email (CMS_FEPS@cms.hhs.gov – technical matters).

- Telephone

- HIOS MLR User Guide
  - Accessible on the HIOS MLR module – via the FAQ section.
2013 Medical Loss Ratio Reporting

Center for Consumer Information and Insurance Oversight

April 2014
Agenda

- Changes to the 2013 MLR Reporting Form
- Differences between the MLR Form and the Supplemental Health Care Exhibit (SHCE)
- Data Aggregation
- MLR Formula Tool
- Data Validations
- Expatriate Business
- Companies with only small closed blocks of business
Changes to the MLR Reporting Form in 2013 include:

• Added a column for Student Health Plans
• Added a drop-down for federal tax exempt status
• Added a new line for Patient Centered Outcomes Research Institute (PCORI) fees
• Added new lines for a temporary adjustment to the MLR denominator for 2014 ACA fees collected in 2013 for non-calendar year policies
Differences from the SHCE

- ICD-10 and Health Insurance Technology (HIT)
  - The MLR Form excludes ICD-10 conversion expenses from HIT (Part 1 Line 4.5)
  - The SHCE includes ICD-10 conversion expenses in HIT (Part 1 Line 6.5)

- Community Benefit Expenditures (CBE)
  - The MLR Form has a line for deductible CBE (Part 1 Line 3.2c) and a line for all CBE (Part 1 Line 5.7)
  - The SHCE has a line for deductible CBE (Part 1 Line 1.6a) and a line for non-deductible CBE (Part 1 Line 10.4a)

- PCORI Fees
  - The MLR Form has a separate line for PCORI fees
  - The SHCE includes PCORI fees in the line for federal taxes
• All issuers are required to aggregate three years of experience
  – Exception: Report only 2013 data for student health plans
• Enter 2013 data in Parts 1, 2, 3 & 6; Part 4 Column CY; and Part 5 Sections 1-3
• Enter 2012 data in Part 4 Column PY1 and in Part 5 Section 4
  • Restate 2012 incurred claims (including reserves and the allowable fraud reduction expense) as of 3/31/2014 in Part 4 Line 1.2 Column PY1
• Enter 2011 data in the Part 4 Column PY2
  • Restate 2011 incurred claims (including reserves and allowable fraud reduction expenses) as of 3/31/2014 on Part 4 Line 1.2 Column PY2.
• Aggregate data for 2011, 2012 & 2013 in the Part 4 Total Column
  – MLRs are calculated using aggregated data
  – Rebates are calculated using only 2013 adjusted premium
MLR Formula Tool

- CMS will post an Excel Formula Tool with MLR and rebate calculations on the CCIIO website

- To use the Formula Tool, enter:
  - 2013 data in Parts 1 and 2
  - 2011 and 2012 data in the PY2 and PY1 columns in Part 4
  - 2013 average deductible in Part 4
  - MLR standards for 2011, 2012 and 2013 in Part 4

- After the Formula Tool calculates the remaining Part 4 values, copy the data into the official 2013 reporting form (downloaded from HIOS) using one of the following methods:
  - Use the "Copy to HIOS Template" macro in the first tab of the Formula Tool
  - OR-
  - Manually copy and “paste values” into the official reporting form
• Submissions undergo several automated data checks in HIOS
  – Validation errors (e.g. text into a numeric field) must be corrected prior to attestation
  – Validation warnings indicate unusual data (e.g. negative member months) but do not prevent a user from attesting
• CMS will post the validation rules on the CCIIO website
• Warning emails sent to the issuer only contain some of the validation failures
• The full list of validation failures related to a particular MLR report can be found on the Warning and Comparison Report in HIOS
• The Warning and Comparison Report is available on the “View Uploaded Data” or the “Attestation” pages in HIOS

• The report has four tabs:
  – Validation Warnings: Inconsistencies and unusual data on a state report
  – Grand Total Warnings: Inconsistencies and unusual data on the Grand Total report
  – MLR Calculation Tab: Discrepancies between user-entered values and HIOS–calculated values
  – SHCE/MLR-A Warnings: Discrepancies between an issuer’s 2013 SHCE values and the values reported in the “12/31” columns of the 2013 MLR Form
Companies with Expatriate Business:

• For the 2013 MLR reporting year, CMS will not enforce the MLR rebate and reporting provisions for expatriate lines of business. (See tri-departmental guidance for more information http://www.dol.gov/ebsa/faqs/faq-aca13.html.)

• Companies that only have expatriate business do not need to file the 2013 MLR report

• Companies that have expatriate business in addition to other health insurance business should report expatriate business only in the “12/31 Expatriate” columns on Parts 1 & 2 of the “Grand Total” form
 issuers do not have to complete all sections of the 2013 MLR reporting form if they satisfy all of the following criteria:

1. Ceased offering health insurance coverage in every market and state in which it is licensed to offer health insurance coverage,

2. Have only grandfathered health plans in closed blocks of business that are in run-off,

3. Are exempted by the domiciliary state from filing an SHCE or similar state filing,

4. Have less than 1,000 life years nationwide (combined for all health insurance coverage) for the MLR reporting year, and

5. Have non-credible experience (using aggregated data from 2011, 2012, and 2013) in each state market in which it provides coverage.
An issuer that meets all of the criteria should:

- Select “Yes” in the “small closed blocks of business” box on the HIOS “company-issuer association” screen
- Complete only Part 4 Line 3.1 for all columns (PY2, PY1, CY, Total) of the MLR Form in every applicable state and market
- Use the HIOS “supplemental upload” function to submit:
  - Documentation of a filing exemption from the domiciliary state
  - A statement affirming that the issuer meets the small closed block criteria
- Attest to the submission in HIOS
Questions and Resources

• For HIOS questions, please contact the Exchange Operations Support Center at CMS_FEPS@cms.hhs.gov or 855-267-1515

• For questions related to the MLR Reporting Form, please email CCIIO at MLRQuestions@cms.hhs.gov

• CCIIO will host MLR Q&A conference calls every Thursday from 2pm to 3pm (EDT) from April 17 through May 29

• CCIIO’s MLR website is http://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Market-Reforms/Medical-Loss-Ratio.html