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

Objective

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

- Approximately 45 minute session with Q&A at the end.
- Please hold your questions until the end.
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 provided 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 (CCIIIO) 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 Excel templates (MLR-A and Risk Corridors Plan-Level Data templates).

The submission window for the 2014 reporting year will open on July 1, 2015.

Submissions for the 2014 reporting year are due by July 31, 2015.
The temporary risk corridors program is intended to protect individual and small group market Qualified Health Plans (QHPs) against rate-setting uncertainty and provide greater premium stability for these plans during the 2014-2016 benefit years.

The risk corridors program applies only to QHP issuers (excluding stand-alone dental plans).

Issuers will submit risk corridors data through the HIOS MLR module during the same submission window as MLR (July 1-July 31, 2015).
Overview – Risk Corridors Program

- Risk corridors data will be collected in two ways:
  - Parts 1-3 of the MLR Form
  - Risk Corridors Plan-Level Data Form

- This includes data on premium earned, profit, allowable costs, taxes, and allowable administrative expenses.

- Data is used to calculate the risk corridors payment or charge amount, which is incorporated into the calculation of the issuer’s MLR.

- **Note:** CMS will hold separate trainings on June 1st & 3rd to provide detailed instructions on completing the Risk Corridors Plan-Level Data Form.
### 3. Risk Corridors Calculation

<table>
<thead>
<tr>
<th>Description</th>
<th>Formula/Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allowable costs (Lines 1.2 + 1.3 - 1.4 - 1.5 - 1.6)</td>
<td></td>
</tr>
<tr>
<td>Administrative costs excluding taxes (MLR Form Part 1 Lines 5.1 + 5.2 + 5.3 + 5.4 + 5.5a + 5.5b + 5.6)</td>
<td></td>
</tr>
<tr>
<td>Ratio of allowable costs to after-tax premium (Lines 3.1 / (2.1 - 2.2))</td>
<td></td>
</tr>
<tr>
<td>Transitional Adjustment Percentage (if Line 3.3 ≥ 80%)</td>
<td></td>
</tr>
<tr>
<td>Profit for risk corridors calculation (the greater of Lines 3.5a or 3.5b)</td>
<td></td>
</tr>
<tr>
<td>Earned profit (Lines 2.1 - 3.1 - 2.2 - 3.2)</td>
<td></td>
</tr>
<tr>
<td>Capped profit ((3% + Line 3.4) x (Lines 2.1 - 2.2))</td>
<td></td>
</tr>
<tr>
<td>Allowable administrative costs (the lesser of Lines 3.6a or 3.6b)</td>
<td></td>
</tr>
<tr>
<td>Profit and administrative costs excluding taxes (Lines 3.2 + 3.5)</td>
<td></td>
</tr>
<tr>
<td>Capped administrative costs ((20% + Line 3.4) x (Lines 2.1 - 2.2) + Line 2.2)</td>
<td></td>
</tr>
<tr>
<td>Capped administrative costs without adjustment (20% x (Lines 2.1 - 2.2) + Line 2.2)</td>
<td></td>
</tr>
<tr>
<td>Risk corridors adjusted target amount (Lines 2.1 - 3.6)</td>
<td></td>
</tr>
<tr>
<td>Allowable administrative costs without adjustment (the lesser of Lines 3.6a or 3.6c)</td>
<td></td>
</tr>
<tr>
<td>Risk corridors unadjusted target amount (Lines 2.1 - 3.8)</td>
<td></td>
</tr>
<tr>
<td>Unadjusted risk corridors ratio (Lines 3.1 / 3.9)</td>
<td></td>
</tr>
<tr>
<td>Risk corridors aggregate amount by market without adjustment (from Risk Corridors Plan Data Form, Part 3 Line 9)</td>
<td></td>
</tr>
<tr>
<td>Risk corridors total payment or charge amount used for MLR calculation (from Risk Corridors Plan Data Form, Part 3 Line 10)</td>
<td></td>
</tr>
</tbody>
</table>
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. Download Risk Corridors Plan Level Data templates.
7. Populate Risk Corridors Plan Level Data templates.
8. Upload completed Risk Corridors Plan Level Data templates.
10. Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials.

- 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:

- Login to the CMS Portal using their EIDM User ID and Password.
- Access HIOS.
- Request access to the HIOS MLR module and their associated user role.

**Note:** Users must request their individual user roles for each company. Existing users will retain their existing HIOS user roles and are not required to submit another user role request.
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.
  - Register in HIOS.
  - Request access to HIOS in the CMS Enterprise Portal.
  - 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.
EIDM Account Registration for New Users

- Complete the remaining steps to create your CMS - HIOS User account.

- Once the users fill in the required information and select ‘Submit’ button, the request will be sent for approval.

- The users will receive an email notification when the user account has been approved. The email will explain the additional steps required.
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 located in the middle of the HIOS Sign-In page.
Self Registration for New HIOS Users

- Complete the Self Registration page.

- Once the users fill in the required information and select ‘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
Click on ‘Manage an Organization’ tab on the HIOS homepage.
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.
Search by Federal EIN

- Select “Create New Organization” as the purpose of your visit.
- Select “Company” as type of organization.
- 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 Organization

- Fill in the following required information to register a new company:
  - Organization Legal Name
  - Domiciliary Address
- Click the ‘Continue’ button to continue entering your company’s information before submitting the request to register a new company.
Register Attributes for New Organization

- Fill in the following required information to register a new company:
  - Incorporated State

- While not mandatory, provide your organization’s NAIC Company and Group Codes and Group Name, if applicable.

- 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.

The users will receive an email notification confirming the approval of the submitted request.
User Role Management
Registration Process (cont’d)

Step 2: Determine MLR user role and request access to the company.

- Users will need to determine their user role and identify the company to which they need access.

- If users need to update their current MLR user role to another user role, they will need to contact the Exchange Operations Support Center (XOSC) at CMS_FEPS@cms.hhs.gov to remove their current user role.

  - If another user is already associated to the user role you are requesting, you will need to contact the XOSC to remove association from the other user.

  - Once the user role has been removed from the other user, you can proceed with requesting that user role for yourself.
Below is a brief description of the various user roles within the MLR module:

- **Primary/Backup Uploader** – This user is responsible for uploading the MLR-A and Risk Corridors Plan Level Data Templates through the HIOS MLR module.

- **Primary/Backup CEO Attester** – This user is responsible for attesting to the accuracy and completeness of the MLR and Risk Corridors Plan Level data and supplemental materials submitted.

- **Primary/Backup CFO Attester** – This user is responsible for attesting to the accuracy and completeness of the MLR and Risk Corridors Plan Level data and supplemental materials submitted.

Users can only have access to one user role at a time for each company.

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.
Company Association

- Enter the FEIN of the company to which you wish to request access 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.

- **Note:** Please ensure that you are not already associated to a user role for this company, or another user is not already associated to the user role you are requesting.
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.

The users will receive an email notification once the role request has been submitted for approval and approved.
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:

- Click the ‘Manage an Organization’ tab on the HIOS Homepage.
After selecting the purpose of your visit and type of organization, 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.
Once the new issuer(s) are ready for submission, click the ‘Submit’ button.

After the request to register the issuer(s) has been submitted, the users will receive an email notification with the new HIOS Issuer ID. Please save this email for future reference.
Accessing the MLR Homepage

To access the MLR module, click the ‘Medical Loss Ratio Data Collection System (MLR)’ tab on the HIOS homepage.
MLR Homepage

Health Insurance Oversight System
Medical Loss Ratio Data Collection System

Monday, March 23, 2015

Announcements

Welcome to the Medical Loss Ratio module of the Health Insurance Oversight System (HIOS), Issuers will use HIOS to submit MLR and Risk Corridors data to the Department of Health and Human Services’ Center for Consumer Information and Insurance Oversight.

Questions about the MLR reporting form may be submitted to MLRQuestions@cms.hhs.gov. Questions about the Risk Corridors reporting form may be submitted to ACARiskCorridors@cms.hhs.gov.

For more information about HIOS, please contact CMS_FEPS@cms.hhs.gov.
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 – Download Risk Corridors Plan Level Data templates.

Step 7 – Populate Risk Corridors Plan Level Data templates.

Step 8 – Upload completed Risk Corridors Plan Level Data templates.

Step 9 – Upload supplemental materials.

Step 10 – Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials.
Every company will need to confirm the list of its associated issuers for which the company will report MLR data for the reporting year (e.g., 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 Company Information tab 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 and Risk Corridors Plan-Level Data templates (if applicable) until you confirm the associations.

Purpose of Confirming 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 2014 MLR Reporting Form Instructions.
Indicate your company’s federal tax exempt status, as established by the Internal Revenue Service.
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: 123123123</th>
<th>A.M. Best Number:</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 City: Fairfax</td>
</tr>
<tr>
<td>Not-for-Profit?: Yes</td>
<td>NAIC Group Code:</td>
<td>Domiciliary State: Virginia</td>
</tr>
<tr>
<td>DBA / Marketing Name: Company 123</td>
<td>NAIC Group Name: Company ABCD</td>
<td>Domiciliary Zip: 22124</td>
</tr>
</tbody>
</table>

| Domiciliary Zip Plus 4: |

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>172721</td>
<td>VT</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>236486</td>
<td>MA</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>3</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>Delete</td>
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<tr>
<td>4</td>
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<tr>
<td>5</td>
<td></td>
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</tr>
</tbody>
</table>
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Step 8 – Upload completed Risk Corridors Plan Level Data templates.
Step 9 – Upload supplemental materials
Step 10 – Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials.
Each company will have access to a set of MLR-A template files for each issuer with pre-populated company 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.
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), available for download (named “HHS-MLR-2014.zip”).

Extract the contents of the zip file into a folder on your computer.
Downloading the MLR-A Templates (screenshot)

Download Templates

Please select the Company and Reporting Year to download the MLR Annual Template. (*) Indicates a required field.

*Company:
*Reporting Year:
Group Affiliation:

You are associated with the following states:

Download Files

Zip File(s) to Download:
The MLR .zip file contains all of the state templates and the Grand Total template for your company.
HHS-MLR-2014.zip

The Risk Corridors .zip file contains all of the QHP Issuer templates for your company.
HHS-RiskCorridor-2014.zip
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Populating the MLR-A Template

- Populate all cells applicable to your block of business:
  - **White** cells indicate that data entry by the user is permitted.
  - **Grey** cells indicate that no data entry is permitted. Entering data in the gray cells will result in an upload failure.
  - **Green** cells indicate that a calculation by the issuer is required according to the MLR Form instructions (values are not auto-calculated).

<table>
<thead>
<tr>
<th>Line Description</th>
<th>SHCE</th>
<th>1 Health Insurance INDIVIDUAL Total as of 12/31/14</th>
<th>2 Health Insurance INDIVIDUAL Total as of 3/31/15</th>
<th>3 Health Insurance INDIVIDUAL Deal Contracts (Included in Total as of 3/31/15)</th>
<th>4 Health Insurance INDIVIDUAL Deferred PY1 (Add)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Premium</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1 Total direct premium earned</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.2 Federal high risk pools</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.3 State high risk pools</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.4 Net assumed less ceded reinsurance premium earned (exclude amounts already reported in Line 1.1)</td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>1.5 Other adjustments due to MLR calculations - premium</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.6 Risk revenue</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>2. Claims</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>2.1 Total incurred claims (MLR Form Part 2, Line 2.16)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.2 Prescription drugs (informational only; already included in total incurred claims above)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.3 Pharmaceutical rebates (informational only; already excluded from total incurred claims above)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.4 State stop loss, market stabilization and claim/vendor based assessments (informational only; already excluded from total incurred claims above)</td>
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<td></td>
</tr>
</tbody>
</table>
You can copy and paste blocks of data.

When copying and pasting, select the Paste Values option in order to prevent inadvertently modifying the template. Alternatively, use the MLR Calculator to calculate and copy data into the MLR-A template.

Companies with QHP issuers should download and populate the Risk Corridors Plan Level Data templates to be able to complete the MLR-A Templates. However, do not upload the Risk Corridors Plan Level Data templates until you have successfully uploaded the MLR-A Templates.

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 Plans) 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:

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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 OR choose “Send to” and “Compressed (zipped) folder” option. 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.
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 Confirmation

- All 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 Uploading will receive an email indicating the reasons why the upload failed.

- Once successfully uploaded, the MLR data will be ready for attestation.
The MLR reporting process consists of the following steps:

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The risk corridors plan level data form is a separate form that is downloaded and submitted through HIOS.

Issuers will input some information from the MLR template on the risk corridors plan level form, as well as premium amounts for each QHP the issuer offers.

The form will use this information to automatically calculate risk corridors payment and charge amounts.
Each company with QHP issuers will be able to access and download a risk corridors plan level data template for each QHP issuer.

The risk corridors plan level data template will include pre-populated company information, and pre-populated 14-digit HIOS plan IDs for each of the issuer’s QHPs that were registered in HIOS in 2014.
The MLR module will generate a zip file containing all Risk Corridors Plan Level Data template files for the selected company and benefit year.

If your company has QHP Issuers and cannot download a Risk Corridors Plan Level Data template, please contact ACARiskCorridors@cms.hhs.gov.

The zip file will only become available for download after company-issuer associations have been confirmed.
How to Download Risk Corridors Plan Level Data Templates

- Select the “Download Templates” tab.
- Select the “Company” and “Reporting Year”.
- Click “Download Files”.
- The MLR module will generate a zip file containing pre-populated Risk Corridors Plan Level Data templates (named “HHS-RiskCorridor-2014.zip”).
- Extract the contents of the zip file into a folder on your computer.
The MLR reporting process consists of the following steps:

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Step 8 – Upload completed Risk Corridors Plan Level Data templates.
Step 9 – Upload supplemental materials
Step 10 – Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials.
### Overview of the Risk Corridors Plan-Level Data Template

#### 1. Non-Grandfathered ACA-compliant plans

<table>
<thead>
<tr>
<th>Risk Corridors Plan Level Data - Individual</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Individual Total Premium Earned</td>
<td>B. Individual Proportion of Market Premium</td>
</tr>
<tr>
<td>All non-Grandfathered ACA-compliant plans</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

#### 2. Exchange QHPs

<table>
<thead>
<tr>
<th>C. Plan Name*</th>
<th>D. HIOS Plan ID*</th>
<th>E. Individual Total Premium Earned</th>
<th>F. Individual Proportion of Market Premium in Table 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
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<tr>
<td>18</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
Format of the Risk Corridors Plan-Level Data Template

- **Tab 1:** Individual market business
- **Tab 2:** Small group market business
- **Tab 3:** Calculates risk corridors payment or charge using user-provided information from MLR Reporting form and information from Tabs 1 and 2.

**Structure of Tabs 1 & 2:**

- Fields for aggregate market premium
- Fields for QHP premium by HIOS plan ID
- Data on plan premium and HIOS plan ID is collected for Exchange QHPs, QHPs offered off the Exchange that are the same as an Exchange QHP, and plans that are substantially the same as an Exchange QHP.
Populating the Risk Corridors Plan-Level Data Template

- You can copy and paste blocks of data.
- When copying and pasting, select the Paste Values option in order to prevent inadvertently modifying the template.
- HIOS Plan IDs should be entered in the following format: Issuer ID (five digits) + Issuer State Abbreviation (2 letters) + Component ID (7 digits).
- Save the completed Risk Corridors Plan Level Data template file for upload to the MLR module. The user must upload the company’s MLR reporting form before it uploads the risk corridors plan level data form.
White cells indicate that data entry by the user is permitted.

However, pre-populated Plan Names and HIOS Plan IDs cannot be altered. Plan Names and HIOS Plan IDs entered into section 2 (“Exchange QHPs”) of tabs 1 and 2 are automatically copied into section 3 (“Off-Exchange QHPs”).

Grey cells indicate that no data entry is permitted.

Entering data in the gray cells will result in an upload failure.

Green cells indicate that a calculation is performed in the cell.

No data entry is permitted as values in the green cells will be auto-calculated.
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 – Download Risk Corridors Plan Level Data templates.
Step 7 – Populate Risk Corridors Plan Level Data templates.
Step 8 – Upload completed Risk Corridors Plan Level Data templates.
Step 9 – Upload supplemental materials
Step 10 – Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials
You must combine all completed Risk Corridors Plan-Level Data 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 OR choose “Send to” and “Compressed (zipped) folder” option. Type a file name with no spaces at the end of the directory.

- **INCORRECT:** Do NOT zip the files at the folder level. Files will fail to upload.
Uploading the Risk Corridors Template Zip File

- Risk Corridors Plan-Level Data template upload is only allowed after successful MLR submission upload.
- Select the “Upload Risk Corridors Plan Level Data Template” tab.
- Select the “Company” and the “Benefit 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 Risk Corridors Plan-Level data has been uploaded, pending validation checks.
- A table is shown at the bottom of the page, displaying all previously uploaded Risk Corridors submissions.
All 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 Uploaders will receive an email indicating the reasons why the upload failed.

Once successfully uploaded, the Risk Corridors Plan-Level data will be ready for attestation.
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 – Download Risk Corridors Plan Level Data templates.
Step 7 – Populate Risk Corridors Plan Level Data templates.
Step 8 – Upload completed Risk Corridors Plan Level Data templates.

Step 9 – Upload supplemental materials.

Step 10 – Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials.
Companies may submit supplemental materials to justify or explain 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 before uploading supplemental materials.

- Note: No spaces are allowed in the supplemental material file names.
- Only PDF and MS Word documents are allowed.
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)”.
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 – Download Risk Corridors Plan Level Data templates.
Step 7 – Populate Risk Corridors Plan Level Data templates.
Step 8 – Upload completed Risk Corridors Plan Level Data templates.
Step 9 – Upload supplemental materials.

Step 10 – Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials.
HIOS will notify Attesters by email once the MLR data has been uploaded and is ready for attestation.

If the company has QHP Issuers, Risk Corridors Plan Level data must be uploaded successfully before attestation can occur.

If the upload(s) 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.

Both the CEO Attester and CFO Attester must attest to the accuracy of the uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials in order for the filing to be complete.
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”.

Attesting to the Uploaded Data
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 templates.
Step 5 – Upload completed MLR-A templates.
Step 6 – Download Risk Corridors Plan Level Data templates.
Step 7 – Populate Risk Corridors Plan Level Data templates.
Step 8 – Upload completed Risk Corridors Plan Level Data templates.
Step 9 – Upload supplemental materials.
Step 10 – Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials.
Next Steps – Additional Trainings

- MLR Reporting Form Q&A calls:
  - CCIIO will address questions about the 2014 MLR reporting form weekly, beginning May 28th through July 30, 2015, from 2 to 3pm (EDT).

- Risk Corridors Plan-Level Data Form Trainings:
  - CCIIO will hold two detailed trainings on June 1, 2015 and June 3, 2015 (1:30-3pm EDT). The trainings will be identical. Announcements and registration will be conducted through RegTap.
Contacts & Additional Resources

Email:
- MLR policy matters: MLRQuestions@cms.hhs.gov.
- Risk corridors policy matters: ACARiskCorridors@cms.hhs.gov.
- Technical matters: CMS_FEPS@cms.hhs.gov (Exchange Operations Support Center).

Telephone:

HIOS MLR User Guide:
- Accessible on the HIOS MLR module via the Related Links and FAQ section.
Agenda

• Reporting Sequence for Companies with QHP Issuers
• Changes to the 2014 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
Reporting Sequence for Companies with QHP Issuers

For 2014, companies with QHP issuers will complete the MLR Form (which includes new columns for risk corridors data), as well as the Risk Corridors Plan-Level Data Form
– This slide does not apply to companies that did not offer QHPs

The forms should be completed in the following order:
1. Complete the MLR Form, except for the following:
   – Do not complete Part 2 Line 1.11; Part 3 Lines 1.7-1.9 and Sections 5-6; and Part 4
2. Complete the Risk Corridors Plan-Level Data Form
   – Use the calculated risk corridors column values from Part 3 of the MLR Form to complete Tab 3 of the Risk Corridors Plan-Level Data Form
3. Complete the remainder of the MLR Form
   – Use the calculated values from Tab 3 Lines 9 and 10 of the Risk Corridors Plan-Level Data Form to complete MLR Form Part 2 Line 1.11; Part 3 Lines 1.7, 3.11-3.12; and all the dependent calculations
4. Upload the MLR Forms
5. Upload the Risk Corridors Plan-Level Data Forms
Changes to the MLR Reporting Form for 2014 include:

- Added rows and columns for Risk Corridors data
- Modified calculations to incorporate payments & charges under the Federal premium stabilization programs (3Rs)
- Added new lines for:
  - ACA section 9010 fees
  - Federal transitional reinsurance, risk corridors, and risk adjustment (3Rs)
  - Advance premium tax credits
  - Cost-sharing reduction payments
- Moved Expense Allocation (previously Part 3) to the end of the Form, and renumbered Parts 3-6 accordingly
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
Differences from the SHCE (cont’d)

- Premium Stabilization Programs / Risk-Sharing Provisions (3Rs)
  - The 2014 MLR Form treats:
    - Reinsurance contributions as regulatory authority licenses and fees (Part 1 Line 3.3a)
    - Reinsurance payments as a reduction to MLR numerator (Part 2 Line 1.9)
    - Risk adjustment net payments/charges as a net reduction/addition to MLR numerator (Part 2 Line 1.10)
    - Risk corridors net payments/charges as a net reduction/addition to MLR numerator (Part 2 Line 1.11)
  - The 2014 SHCE treats:
    - Reinsurance contributions as ceded reinsurance premium in part (in Individual market) and/or federal assessment in part (in Individual market) or in full (in Group markets and other lines of business)
    - Reinsurance payments as reinsurance recoveries (in Individual market)
    - Risk adjustment net payments/charges as receivable/payable adjustments to premium
    - Risk corridors net payments/charges as receivable/payable rate credits / retrospective adjustments to premium
All issuers are required to aggregate three years of experience (two years for Student Health Plans experience)

- Enter 2014 data in Parts 1 and 2; Part 3 Columns CY and RC; and Part 4 Sections 1-3
- Enter 2013 data in Part 3 Column PY1 and Part 4 Section 4
  - Restate 2013 incurred claims (including reserves and the allowable fraud reduction expense) as of 3/31/2015 in Part 3 Line 1.2 Column PY1
- Enter 2012 data in Part 3 Column PY2
  - Restate 2012 incurred claims (including reserves and allowable fraud reduction expenses) as of 3/31/2015 on Part 3 Line 1.2 Column PY2
- Aggregate data for 2012, 2013 & 2014 in Part 3 Total Column
  - MLRs are calculated using aggregated data
  - Rebates are calculated using only 2014 adjusted premium
CMS will post an Excel formula tool with built-in MLR, rebate, and partial risk corridors calculations on the CCIIO website.

To use the MLR Calculator, enter:
- Issue State and Federal tax exempt status in Company Information tab
- 2014 data in white cells of Parts 1 and 2
- 2012 and 2013 data in white cells of PY2 and PY1 columns in Part 3
- 2014 cost-sharing reductions and average deductible in Part 3
- If you had QHP issuers:
  - Enter the amounts computed by the MLR Calculator in RC columns of Part 3, on Tab 3 of the official 2014 Risk Corridors Plan-Level Data Form (downloaded from HIOS)
  - Complete the entire 2014 Risk Corridors Plan-Level Data Form
  - Enter the amounts automatically calculated by the 2014 Risk Corridors Plan Level Data Form for MLR purposes (Tab 3, Lines 9 and 10) on Part 2 Line 1.11 and Part 3 Lines 3.11-3.12 of the MLR Calculator
After the MLR Calculator completes calculation of the values in all green cells, copy the data into the official 2014 MLR reporting form (downloaded from HIOS) using one of the following methods:

- Use the "Copy to HIOS Template" macro in the Start Here tab of the Formula Tool to copy the entire Parts 1-5
  - Note that this will overwrite any information already entered on the HIOS template with information entered on the MLR Calculator
- OR –
- Manually copy and “paste values” into the official reporting form
  - Note that you cannot paste over gray cells that divide sections or correspond to purely descriptive lines
Submissions undergo several automated data checks in HIOS
- Validation errors (e.g. text entered in 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 2014 SHCE values (as of 4/10/15) and the values reported in the “12/31” columns of the 2014 MLR Form
Companies with Expatriate Business:

• For the 2014 MLR reporting year, CMS will not enforce the MLR rebate and reporting provisions for certain expatriate lines of business, in accordance with the March 8, 2013 and Jan. 9, 2014 tri-departmental guidance. Please see the Jan. 9, 2014 guidance for the definition of expatriate plans eligible for this transitional relief: http://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/aca_implementation_faqs18.html

• Companies that only have expatriate business do not need to file the 2014 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 2014 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 combined data from 2012, 2013, and 2014) in each state market where they provide coverage.
Small Closed Blocks of Business Reporting

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 3 Line 4.1 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
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

For questions related to the Risk Corridors Plan-Level Data Form, please email CCIIO at ACARiskCorridors@cms.hhs.gov

CCIIO will host MLR Q&A conference calls every Thursday from 2pm to 3pm (EDT) from May 28 through July 30