Filing Medical Loss Ratio and Risk Corridors Annual Reports through HIOS
Agenda

• 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.
Overview – MLR Program

• The Patient Protection & Affordable Care Act requires health insurance issuers to 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, & on all other non-claims costs. The proportion 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 collects the MLR data.
Overview – MLR Program

• 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 Annual Reporting Form and Risk Corridors Plan-Level Data Form).

• The submission window for the 2016 reporting year will open on June 30, 2017.

• Submissions for the 2016 reporting year are due by July 31, 2017.
Overview – Risk Corridors Program

- 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 (June 30-July 31, 2017).
Overview – Risk Corridors Program

- Risk corridors data will be collected in two ways:
  - Parts 1-3 of the MLR Annual Reporting 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 in June to provide detailed instructions on completing the Risk Corridors Plan-Level Data Form.
## Overview – Risk Corridors Program

<table>
<thead>
<tr>
<th>Line Description</th>
<th>1 Health Insurance Coverage INDIVIDUAL PY2</th>
<th>2 Health Insurance Coverage INDIVIDUAL PY1</th>
<th>3 Health Insurance Coverage INDIVIDUAL CY</th>
<th>4 Health Insurance Coverage INDIVIDUAL Total</th>
<th>4A Health Insurance Coverage INDIVIDUAL RC</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. Risk Corridors Calculation</td>
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</tr>
<tr>
<td>3.1 Allowable costs (Lines 1.2 + 1.3 - 1.4 - 1.5 - 1.6 + 7.2)</td>
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<td>3.2 Administrative costs excluding taxes (Part 1 Lines 5.1 + 5.2 + 5.3 + 5.4 + 5.6a + 5.6b + 5.6)</td>
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<tr>
<td>3.3 Profit for risk corridors calculation (the greater of Lines 3.3a or 3.3b)</td>
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<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>3.3a Earned profit (Lines 2.1 - 3.1 - 2.2 - 3.2)</td>
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<td></td>
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</tr>
<tr>
<td>3.3b Capped profit (3% x (Lines 2.1 - 2.2))</td>
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<tr>
<td>3.4 Allowable administrative costs (the lesser of Lines 3.4a or 3.4b)</td>
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<tr>
<td>3.4a Profit and administrative costs (Lines 3.2 + 3.3 + 2.2)</td>
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<tr>
<td>3.4b Capped administrative costs (20% x (Lines 2.1 - 2.2) + Line 2.2)</td>
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<td>3.5 Risk corridors target amount (Lines 2.1 - 3.4)</td>
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</tr>
<tr>
<td>3.6 Risk corridors aggregate amount by market (from Risk Corridors Plan-Level Data Form, Part 3 Line 5)</td>
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<tr>
<td>3.7 Risk corridors payment expected from HHS or charge payable to HHS (from Risk Corridors Plan-Level Data Form, Part 3 Line 6)</td>
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</tr>
</tbody>
</table>
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 templates.
- Step 4 – Populate MLR templates.
- Step 5 – Upload completed MLR 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 can be accessed through the CMS Enterprise Portal at http://portal.cms.gov

To be able to access the HIOS application, the users will need to complete the EIDM registration process (new HIOS users shall need to go through remote identity proofing [RIDP]).

Once the users have completed the EIDM registration, they can request access to the HIOS application, where they are prompted to fill in the HIOS Request Account information.

Once complete, the users shall receive an Authorization code which they would need to provide on the Request HIOS access page to complete the process.

Once complete, the users can now access the HIOS application and its functionalities based on what user roles they have within the system.
EIDM Login for Existing HIOS Users

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

New users will navigate to the CMS Enterprise Portal, https://portal.cms.gov

- Select the ‘New User Registration’ link
- Enter the required information on the New User Registration page
- Create User ID and Password
- Select Challenge Questions and Answers
- Submit account request
- Receive email with EIDM User ID and Password
New users will navigate to the CMS Enterprise Portal, https://portal.cms.gov

- Select the ‘Login to CMS Secure Portal’ link
- Agree to the Terms and Conditions
- Enter the EIDM User ID, Password, and Security Code
New Users – MFA Registration

- Users are required to register at least 1 Multi-Factor Authentication (MFA) device to use during the login process.
- After entering their EIDM user ID, the user will select the “Register MFA Device” link.
New Users – MFA Registration

Users have the option to select the MFA Device Type:

- Text Message
- E-mail
- Phone/Tablet/PC/Laptop (Add-on program)
- Voice Message
New Users – MFA Registration

- **Text Message – Short Message Service (SMS)**
  - User provides a phone number to obtain a security code
- **E-mail**
  - User provides a valid, accessible e-mail address to receive a security code
- **Phone/Tablet/PC/Laptop**
  - User downloads the Symantec Verification and Identity Protection (VIP) Access software on their device to generate a security code
- **Voice Message – Interactive Voice Response (IVR)**
  - User provides a phone number to receive a voice message containing the security code

**Note:** Users may register up to four (4) MFA devices.
New Users – MFA Registration

The next time a user tries to login, they will be prompted to enter the security code which shall be sent to the user via the chosen MFA type. Once logged in, users can access HIOS.

Note: This security code will expire in 30 minutes or after it is used successfully for the first time.
Requesting a HIOS Account
HIOS Account Registration

1. Select the ‘Request Access Now’ button
2. From the Access Catalog page, Select the ‘Request Access’ button for HIOS
3. Select ‘Request New System Access’ link
4. Select ‘HIOS-HIOS Application’ from the System Description drop-down menu
5. Select ‘HIOS Issuer’ for the Role
6. New users will need to Select the URL provided on the page
HIOS Account Registration

- New users will navigate to the ‘Request HIOS Account’ page
- Complete the request form and Select the ‘Submit’ button
- Once the account request has been approved, users shall receive an email with a HIOS Authorization Code
HIOS Account Registration

- Users will need to log back in to the CMS Enterprise Portal
- Select ‘Request New System Access’ link
- Select ‘HIOS-HIOS Application’ for the System Description
- Select ‘HIOS Issuer’ for the Role
- Enter the HIOS Authorization Code
- Select the ‘Submit’ button and log out of the portal
Access HIOS through CMS Enterprise Portal


Read the Terms and Conditions and Select **‘I Accept’** to Continue
Access HIOS through CMS Enterprise Portal

Users that have registered in EIDM and HIOS will now see a yellow ‘HIOS’ button displayed on the dashboard.

Selecting the ‘HIOS’ button will open the HIOS landing page. From the landing page, Select the ‘Access HIOS’ hyperlink.
When users select the Access HIOS link, they will be redirected to the HIOS Home page. Users with access to MLR module will be able to see the expandable row on this page.
Registering an Organization in HIOS
Register an Organization

• Users can create organizations through this functionality. New users to HIOS will not have any organization associations or user roles.
• Select the ‘Manage Organizations’ link from the dropdown list to create an organization before requesting user roles.
Register an Organization

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, Request User Roles.
Step 1: Register the Organization in HIOS

- 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 Select the ‘Search’ button.
Register an Organization

If your company’s Federal EIN is not registered in HIOS, the following message will be displayed:

- “No Organization Found”

Select the ‘Create Organization’ button.
Register an Organization

- Fill in the required information to register a new company
- Select the ‘Continue’ button to continue entering your company’s information before submitting the request to register a new company.
User Role Request

- Request User Role
Step 2: Determine MLR user role and request access to the company.

- If a user needs 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, Risk Corridors Plan Level Data Templates, Supplemental Materials, and Attestation Form through the HIOS MLR module.

- **Primary/Backup CEO or CFO Attester** – These users are responsible for reviewing the accuracy and completeness of the MLR and Risk Corridors Plan Level data and supplemental materials submitted.

**Note:** Attesters are required to sign a hard-copy form that is downloaded by the uploader. They will no longer be attesting to the submission within the system, so HIOS registration is optional.

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

To request a role, select the Manage Roles link.

- Select the ‘Request Role’ tab.
- Select the desired ‘Module’ (MLR) from the drop-down menu.
Request User Roles

- 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, Select the ‘Continue’ button and follow remaining steps
Request User Roles

- Enter the FEIN and Select the ‘Search’ button.
- Once your company has been found, Select the ‘Review/Continue’ button to review your new role request.
- **Note:** Please ensure that you are not already associated to another user role for this company, or another user is not already associated to the user role you are requesting.
- The user will receive an email notification once the role request has been submitted for approval and approved.
Adding an Issuer to an Organization
Add Issuer to Organization

- If an organization exists in HIOS, users can add an Issuer(s) to that organization.
- Select the ‘Manage Organizations’ link on the HIOS Homepage.
Add an Issuer

- On the Manage an Organization page, select ‘Edit existing organization’ from the drop-down menu.
- Select the Organization Type.
- Enter the Federal EIN/TIN and select the ‘FEIN/TIN Search’ button.
- Select the ‘Add Issuer’ button.
Add an Issuer

- On the Register New Issuer page, enter the Issuer information and activate the ‘Save and Add Another Issuer’ button.

- The Issuer(s) that you have requested to create will display on the page. Activate the ‘Submit’ button.

- 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 this email for future reference.
Accessing MLR Module

To access the system, select the MLR module and select the ‘Launch This Module’ button on the HIOS homepage.
The MLR reporting process involves the following steps:

Step 1 – Register for the HIOS MLR module.
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Step 9 – Upload supplemental materials
Step 10 – Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials.
Purpose of Confirming 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 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 templates for all issuers expected to be included in the report.

• Uploader users are not able to download the pre-populated MLR templates and Risk Corridors Plan-Level Data templates (if applicable) until you confirm the associations.
Confirming Company-Issuer Associations

- Select the “Company/Issuer Association” tab.
- Select the “Company”.
- Select the “Reporting Year”.
- Select “View Associations”.
- Confirm the list of issuers by Selecting “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 2016 MLR Annual 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.

**FEIN:** 123123123

**Company Name:** Company 123

**Not for Profit:** Yes

**DBA / Marketing Name:** Company 123

**A.M. Best Number:** 12345

**NAIC Company Code:** 12345

**NAIC Group Code:** Company ABCD

**Domiciliary Address Line 1:** 123 Street

**Domiciliary Address Line 2:**

**Domiciliary City:** Fairfax

**Domiciliary State:** Virginia

**Domiciliary Zip:** 22124

**Domiciliary Zip Plus 4:**

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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>Individual</th>
<th>Small Group</th>
<th>Large Group</th>
<th>Individual</th>
<th>Small Group</th>
<th>Large Group</th>
<th>Expatriate</th>
<th>Small Group</th>
<th>Large Group</th>
<th>Student Health</th>
<th>Individual</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 72721</td>
<td>VT</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
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<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
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</tr>
<tr>
<td>2 36486</td>
<td>MA</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
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<td>Yes</td>
<td>No</td>
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<td>No</td>
<td>Yes</td>
<td>Delete</td>
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<td>3 4 5</td>
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</tbody>
</table>

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**CMS**
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 templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR 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.
Overview of Downloading MLR Templates

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

• The MLR module will generate a zip file containing all MLR 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.
Select the “Download Templates” tab.
Select the “Company”.
Select the “Reporting Year”.
Select “Download Files”.
The MLR module will generate a zip file containing pre-populated MLR Templates; one for each issuer plus Grand Total template (named “HHS-MLR-2016.zip”).
Extract the contents of the zip file into a folder on your computer.
The MLR Reporting Process

The MLR reporting process consists of the following steps:

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STEP 9 – Upload supplemental materials
STEP 10 – Attest to accuracy of uploaded MLR data, Risk Corridors Plan Level data, and supplemental materials.
Populating the MLR 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).
  - Tool-tips are used to explain the meaning of each colored cell within the template

![MLR Template Table]

<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 Dual 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>
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<tr>
<td>1.1 Total direct premium earned</td>
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<td>1.2 Federal high risk lost</td>
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<tr>
<td>1.3 State high risk lost</td>
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<tr>
<td>1.4 Not assumed loss of indemnity premium (exclude amounts already reported in Line 1.1)</td>
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<tr>
<td>1.5 Other adjustments due to MLR calculations - premium</td>
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<tr>
<td>1.6 Reimbursement</td>
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<tr>
<td>2. Claims</td>
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<tr>
<td>2.1 Total incurred claims (MLR Form Part 2, Line 2.16)</td>
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<tr>
<td>2.2 Prescription drugs (informational only; already included in total incurred claims above)</td>
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<tr>
<td>2.3 Pharmaceutical rebate (informational only; already excluded from total incurred claims above)</td>
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</tr>
<tr>
<td>2.4 Post loss, market stabilization and claim/waive based assessments (informational only; already excluded from total incurred claims above)</td>
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</tr>
</tbody>
</table>
Populating the MLR 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. Alternatively, use the MLR Calculator to calculate and copy data into the MLR template.
- Companies with QHP issuers should download and populate the Risk Corridors Plan Level Data templates to be able to complete the MLR templates. However, do not upload the Risk Corridors Plan Level Data templates until you have successfully uploaded the MLR templates.
- The data entered on the Grand Total MLR 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 template.
- Save the completed MLR 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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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 MLR templates into a single zip file:

• **CORRECT:** Open the folder. Select all Excel files. Right-click 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.
Uploading the Zip File

- Select the “Upload MLR Annual Form” tab.
- Select the “Company”.
- Select the “Reporting Year”.
- Select “Browse” and select the zip file you created.
- Select “Upload File”.
  - **Note:** No spaces are allowed in the zip file name.
- The system will indicate that the MLR 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 Uploaders will receive an email indicating the reasons why the upload failed.
- Once successfully uploaded, the MLR data is ready for review and attestation.
The MLR Reporting Process

The MLR reporting process consists of the following steps:

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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
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 Data template, as well as premium amounts for each QHP the issuer offers.

The Risk Corridors Plan-Level Data template will use this information to automatically calculate risk corridors payment and charge amounts.
Once company-issuer association has been confirmed, the MLR module will generate a zip file containing all Risk Corridors Plan Level Data templates for each QHP issuer 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 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 2016.
How to Download Risk Corridors Plan Level Data Templates

• Select the “Download Templates” tab.

• Select the “Company” and “Reporting Year”.

• Select “Download Files”.

• The MLR module will generate a zip file containing pre-populated Risk Corridors Plan Level Data templates (named “HHS-RiskCorridor-2016.zip”).

• Extract the contents of the zip file into a folder on your computer.
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 templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR 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.
## Overview of the Risk Corridors Plan-Level Data Template

### Screenshot of part of the Risk Corridors Plan-Level Data Template

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<td>Risk Corridors Plan Level Data - Individual</td>
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<td>1. Non-Grandfathered ACA-compliant plans</td>
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<td>All non-Grandfathered ACA-compliant plans</td>
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<td>2. Exchange QHPs</td>
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</tr>
</tbody>
</table>

* Plan Name
* HIOS Plan ID

---

**A. Individual Total Premium Earned**

**B. Individual Proportion of Market Premium**

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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 Annual 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 templates before it uploads the Risk Corridors Plan Level Data templates.
Risk Corridors Plan-Level Data Template Cell Coding

- **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.

- Tool-tips are used to explain the meaning of each colored cell within the template.
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 templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR 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
Combining Completed Risk Corridors Templates into Zip File

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 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”.
- Select “Browse” and select the zip file you created.
- Select “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.
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 Uploaders will receive an email indicating the reasons why the upload failed.

• Once successfully uploaded, the Risk Corridors Plan-Level Data Form will be ready for review and 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 templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR 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
Supplemental Materials

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

- Select the “Upload Supplemental Materials” tab.
- Select the “Company”.
- Select the “Reporting Year”.
- Select “Browse” and select the supplemental material files for upload.
- Select “Upload File(s)”.  

**Note**: Supplemental Materials can be removed on the “View Uploaded Data” page.
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 templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR 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.
Notification that Data is Ready for Attestation

- HIOS will notify Attesters by email once the 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.
Attesting to the Uploaded Data

• The attestation process has changed from previous years.

• Rather than attesting in HIOS, attesters are now required to sign a hard-copy form that is downloaded by the uploader from the Download Templates tab of HIOS. (see screenshot)
Attesting to the Uploaded Data

- Select the “Download Templates” tab.
- Attesters will sign hard-copy of downloaded form.
- Uploader user scans the signed form as a PDF.
- Select the “Attestation” tab.
- Select the “Company” and the “Reporting Year”.
- Under the ‘Attestation Details’ section, select “Browse” and select the Attestation file that was scanned.
- Select “Upload File”
  - Note: No spaces are allowed in the zip file name.
- Status of submission is reflected as “Attested”
- **Note:** During the opened submission window, the Uploader user can upload MLR and Risk Corridor templates again. However, a subsequent Attestation form will need to be 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 templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR 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 Annual Reporting Form Q&A calls:
  - CCIIO will address questions about the 2016 MLR Annual Reporting Form weekly, beginning June 7th through July 26th from 1-2pm (EDT).
    - Call in information: 1-877-267-1577, Meeting ID 992 348 356#
- Risk Corridors Plan-Level Data Form Trainings:
  - CCIIO will hold two detailed trainings in June. 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. Also posted here: https://www.cms.gov/CCIIO/Resources/Training-Resources/index.html
Agenda

• Reporting Sequence for Companies with QHP Issuers
• Changes to the 2016 MLR Annual Reporting Form
• Optional Rebate Limit Provision
• Differences between the MLR Form and the Supplemental Health Care Exhibit (SHCE)
• Data Aggregation
• MLR Calculator
• Data Validations
• Companies with only small blocks of grandfathered business
Reporting Sequence for Companies with QHP Issuers

QHP issuers complete the MLR Annual Reporting Form (which includes 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 Annual Reporting Form, except for the following:
   - Do not complete Part 2 Line 1.11; any MLR columns on Part 3 (do complete the RC columns on Part 3); 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 Annual Reporting 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 Line 1.7; and all the dependent calculations
4. Upload the MLR Annual Reporting Form
5. Upload the Risk Corridors Plan-Level Data Form
Main Changes to the MLR Annual Reporting Form for 2016:

- Deleted lines in Parts 1 and 6 related to ICD-10 expenses (these expenses can no longer be included in QIA)
- Deleted lines in Part 3 related to the Risk Corridors transitional adjustment percentage (no adjustment applies for 2016)
- Added new lines in Part 3 to effectuate the optional limit on rebates for new and growing issuers
- Renumbered remaining lines in Part 3 accordingly
Optional Rebate Limit Provision

- Issuers now have the option of limiting a single year’s rebate payments to reduce the impact of low MLRs on subsequent years for new or rapidly growing issuers
  - While any issuer may choose to complete the new optional Part 3 Lines 6.5-6.8, this should only benefit issuers that are new or growing, and whose MLRs fall below the standard in one year and increase in subsequent years
  - This provision effectively limits rebates paid over the course of three years with respect to a particular calendar year
  - In order to keep this reporting optional, and because calculating the exact rebate liability would require calculations for all three years in the aggregation period, the Instructions include a phase-in formula that pro-rates the rebate paid in a prior year to each of the three years used on the current year’s reporting form
Differences from the SHCE

- **Premium Stabilization Programs / Risk-Sharing Provisions (3Rs)**
  - The 2016 MLR Annual Reporting Form treats:
    - Reinsurance contributions paid by issuers as regulatory authority licenses and fees (Part 1 Line 3.3a)
    - Reinsurance payments to issuers 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 2016 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

- Enter 2016 data in Parts 1 and 2; Part 3 Columns CY and RC; and Part 4 Sections 1-3
- Enter 2015 data in Part 3 Column PY1 and Line 7.2 in Column RC; and Part 4 Section 4
  - Restate 2015 incurred claims (including reserves and the allowable fraud reduction expense) as of 3/31/2017 in Part 3 Line 1.2 Column PY1 and Line 7.2b Column RC
- Enter 2014 data in Part 3 Column PY2
  - Restate 2014 incurred claims (including reserves and allowable fraud reduction expenses) as of 3/31/2017 on Part 3 Line 1.2 Column PY2.
- Aggregate data for 2014, 2015 & 2016 in Part 3 Total Column
  - MLRs are calculated using aggregated data
  - Rebates are calculated using only 2016 adjusted premium
CMS will post an Excel calculator tool with built-in MLR, rebate, and risk corridors calculations (except for those included in the Plan-Level Data Form) on the CCIIO website.

To use the MLR Calculator, enter:

- Issue State and Federal tax exempt status in Company Information tab.
- 2016 data in white cells of Parts 1 and 2.
- 2014 and 2015 data in white cells of PY2 and PY1 columns, respectively, in Part 3.
- Average deductible in Part 3.
- If you had QHP issuers:
  - Copy the amounts computed by the MLR Calculator in RC columns of Part 3 to Tab 3 of the 2016 Risk Corridors Plan-Level Data Form (downloaded from HIOS).
  - Complete the entire 2016 Risk Corridors Plan-Level Data Form.
  - Copy the amounts automatically calculated by the 2016 Risk Corridors Plan Level Data Form for MLR purposes (Tab 3, Lines 5 and 6) to Part 2 Line 1.11 and Part 3 Lines 3.6-3.7 of the MLR Calculator.
After the MLR Calculator calculates the values in all green cells, copy the data into the 2016 MLR Annual 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 Calculator to copy the entire form (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 HIOS MLR template
  - Note that you cannot paste over gray cells that divide sections or correspond to purely descriptive lines
Data Validations

• 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 submission can be found on the Warning and Comparison Report in HIOS
• Issuers should review both the validation errors and warnings in their respective HIOS Reports to ensure accuracy and completeness of the data submitted
Warning and Comparison Report

• 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 2016 SHCE values (as of 4/19/17) and the values reported in the “12/31” columns of the 2016 MLR Annual Reporting Form
Small Blocks of Grandfathered Business Criteria

Issuers do not have to complete all sections of the 2016 MLR Annual 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 2016; and

5. Have fewer than 1,000 life-years (combined for 2014+2015+2016) in each state market where they provide coverage.
Reporting Small Blocks of Grandfathered Business

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 Annual Reporting 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

• Review and attest to the submission
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 Annual 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 Wednesday June 7th through July 26th from 1-2pm (EDT)
  - Call in information: 1-877-267-1577, Meeting ID 992 348 356#