Filing Medical Loss Ratio Annual Reports through HIOS

June 2023
Agenda - Training

- Welcome
- Overview
- System Walkthrough
- Next Steps and Wrap up
- Organization Role Approver (ORA)
- 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 – 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.
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).

The submission window for the 2022 reporting year will open on July 1, 2023.

Submissions for the 2022 reporting year are due by July 31, 2023.
The MLR Reporting Process – Step 1

The MLR reporting process involves the following steps:

1. Step 1 – Access the HIOS MLR module.
2. Step 2 – Confirm company-issuer association and disassociation.
5. Step 5 – Upload completed MLR templates.
7. Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.
8. Step 8 – View Data
Accessing HIOS

- Users will log into the CMS Enterprise Portal with their IDM Credentials.
  - HIOS can be accessed through the CMS Enterprise Portal at http://portal.cms.gov
  - New users will need to create IDM account and request HIOS access

- Select the Access HIOS link; user will be redirected to the HIOS Home page.
Access HIOS through CMS Enterprise Portal

- To access the system, select the MLR module and select the ‘Launch This Module’ button on the HIOS homepage.
The submission period for the 2022 reporting year is open from 04/19/2023 06:00:00 AM to 11/30/2023 06:00:00 AM.

What would you like to work on today?

**Confirm Issuers**
Review, update and confirm issuer associations to specify the company’s states for which HIOS should generate MLR templates.

**Download Templates**
Download the MLR templates and Attestation form.

**Upload**
Upload the MLR templates, Supplemental Materials and Attestation form.

**View Data**
View the data that has been successfully uploaded, including the system-generated Warnings and Comparison Report.

**Reports**
View and download operational reports.

**Administration**
Manage submission window re-opening and late submission filings, View/Download data extracts and PUF files.

**Questions?**
For questions about MLR reporting, contact MLRQuestions@hrsa.hhs.gov.

**Resources**
- User Manual (1.44 MB, PDF)
- 2021 MLR Instructions Document (PDF) (0.60 MB, PDF)
- HIOS MLR Module and 2021 MLR Report Training (PDF) (1.61 MB, PDF)
- MLR Calculator (XLSM) (0.16 MB, XLSM)
- MLR Website
- FAQ (0.17 MB, PDF)

**Information to Know**
The HIOS MLR module will begin accepting data on Excel templates (MLR Annual Reporting Form) beginning July 1, 2022. Users will be able to download the blank MLR templates in advance of that date.

The 2021 MLR Form and Instructions have not yet been approved by the Office of Management and Budget (OMB). The Form is therefore subject to change. An issuer who uses the Form published in HIOS’ MLR module in June 2022 will be deemed in compliance with the requirement to file its MLR data on a form prescribed by the Secretary even if that form differs from what is ultimately approved.
The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module.

**Step 2 – Confirm company-issuer association and disassociation.**

Step 3 – Download MLR templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR templates.
Step 6 – Upload supplemental materials.
Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.
Step 8 – View Data
Purpose of Confirming Company-Issuer Associations

- The Company is the parent company, and where there is a holding company system, the associated issuers are each issuer that is part of the holding company. And each issuer, once associated, indicates the state(s) in which it has health insurance coverage subject to MLR reporting.

- Every company will need to confirm the list of its associated issuers to 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 pre-populated company and issuer information (e.g., Company Name, HIOS ID, FEIN, etc.).

- The list is also be used to verify the appropriate amount of MLR templates have been submitted.

- Uploader users are not able to download the pre-populated MLR templates until issuer associations are confirmed.
Confirming Company-Issuer Associations

- Navigate to the “Confirm Issuers” page
- Select the “Company” and “Reporting Year”.
- Select the “Next” button.
- Indicate if your company has only a small closed block of business as described in the 2022 MLR Annual Reporting Form Instructions.
- Indicate your company’s federal tax exempt status, as established by the Internal Revenue Service.
- View the list of issuers associated to company.
- Confirm the list of issuers by selecting “Confirm” button
• Select the “Generate File” button.
• System will generate the company-issuer association form.
  – (Note: This process can take up to 15 minutes. The page automatically refreshes once the template generation has completed or user can refresh the page manually).
• System will display form link once generation has completed.
• Select the **Company-Issuer Association Form** link to download the form.
## MLR Company-Issuer Association Form Example

Please review all issuer information, and make updates as 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:</th>
<th>123123123</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name</td>
<td>Company 123</td>
</tr>
<tr>
<td>Not for Profit?</td>
<td>Yes</td>
</tr>
<tr>
<td>DBA / Marketing Name</td>
<td>Company 123</td>
</tr>
<tr>
<td>A.M. Best Number</td>
<td>12345</td>
</tr>
<tr>
<td>NAIC Company Code</td>
<td>Company ABCD</td>
</tr>
</tbody>
</table>

### Domiciliary Address

<table>
<thead>
<tr>
<th>Domiciliary Address Line 1</th>
<th>123 Street</th>
</tr>
</thead>
<tbody>
<tr>
<td>Domiciliary City</td>
<td>Fairfax</td>
</tr>
<tr>
<td>Domiciliary State</td>
<td>Virginia</td>
</tr>
<tr>
<td>Domiciliary Zip</td>
<td>21124</td>
</tr>
</tbody>
</table>

### HIOS Issuer ID

<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</td>
<td>VT</td>
<td>Individual: Yes, Small Group: Yes, Large Group: No</td>
<td>Individual: No, Small Group: No, Large Group: Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Delete</td>
</tr>
<tr>
<td>2</td>
<td>MA</td>
<td>No, No, No</td>
<td>No, No, No</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>4</td>
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<td>5</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
Updating Company-Issuer Associations

• Update the pre-populated form to add or remove any issuers.
• Upload the updated form back to the MLR module.
• Once form is processed, view the updated list of associated issuers.
  – Email notification will be sent once form is processed.
• Confirm the list of issuers by selecting “Confirm” button.
  – Once confirmed, the company-issuer information becomes disabled for editing.
Company-Issuer Disassociations

- The “Unconfirm” button will be enabled, once the company-issuer association has been confirmed for the reporting year.
- Select the “Unconfirm” button to reset the company-issuer association confirmation.
  - The system will display the following message:
    “Confirmation: your company association has been unconfirmed”
The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module.
Step 2 – Confirm company-issuer association and disassociation.

**Step 3 – Download MLR templates.**

Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR templates.
Step 6 – Upload supplemental materials.
Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.
Step 8 – View Data
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.

• Uploader users will need to generate the MLR template zip file.

• Once generated, the system will provide 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.
Generating the MLR Templates

- Navigate to the “Download Templates” page.
- Select the “Company” and “Reporting Year”.
- Select the “Next” button.
- Select the “Generate File” button.
- System will generate the MLR templates (Note: This process can take up to 15 minutes. The page automatically refreshes once the template generation has completed or user can refresh the page manually).
- System will display template zip link once generation has completed.
Downloading the MLR Templates

- Select the **MLR Template** zip file link to download the templates.
- The zip file contains pre-populated MLR Templates; one for each issuer plus Grand Total template (named “HHS-MLR-2022.zip”).
- Extract the contents of the zip file into a folder on your computer.
The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module.
Step 2 – Confirm company-issuer association and disassociation.
Step 3 – Download MLR templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR templates.
Step 6 – Upload supplemental materials.
Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.
Step 8 – View Data
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.
Populating the MLR Template continued

• 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.

• 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 – Step 5

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module.
Step 2 – Confirm company-issuer association and disassociation.
Step 3 – Download MLR templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR templates.
Step 6 – Upload supplemental materials.
Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.
Step 8 – View Data
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 – Step 1

- Navigate to the ‘Upload’ page.
- Select the “Company” and “Reporting Year”.
- Select the **MLR Annual Form** from the “File Type” drop down.
- Select the “Next” button.
  - If incorrect values were selected in above steps, the user can change values by selecting the ‘**Revisit this step**’ button.
Uploading the Zip File – Step 2

- Select the ‘Browse’ button to browse for a file to upload.

- Select the ‘Add’ button to add the file.
  - If incorrect file was selected, select the ‘Remove’ button to remove the file. User will need to browse and select file again.
  - Note: No spaces are allowed in the zip file name.

- Select the ‘Next’ button.
Uploading the Zip File – Step 3

- Review the selected file details (i.e.: Company, Reporting Year, File Type, File selected, Associated States, etc.).

- Select ‘Submit’ button to upload file for processing.

- The system will display confirmation message indicating to the user the file is being processed.
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 involves the following steps:

Step 1 – Access the HIOS MLR module.
Step 2 – Confirm company-issuer association and disassociation.
Step 3 – Download MLR templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR templates.
Step 6 – Upload supplemental materials.
Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.
Step 8 – View Data
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 not required for attestation to the accuracy of the MLR submission.
- The MLR templates must be uploaded and successfully processed 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 – Step 1

• Navigate to the ‘Upload’ page.

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

• Select **Supplemental Materials** from the “File Type” drop down.

• Select the “Next” button.
  – If incorrect values were selected in above steps, the user can change values by selecting the ‘Revisit this step’ button.
Uploading Supplemental Materials – Step 2

- Select the ‘Browse’ button to browse for a file to upload.

- Select the ‘Add’ button to add the file.
  - If incorrect file was selected, select the ‘Remove’ button to remove the file. User will need to browse and select file again.
  - Note: No spaces are allowed in the file name.

- Select the ‘Next’ button.
Uploading Supplemental Materials – Step 3

• Review the selected file details (i.e.: Company, Reporting Year, File Type, File selected, Associated States, etc.).

• Select ‘Submit’ button to upload file.

• The system will display confirmation message indicating to the user the file is uploaded successfully.
The MLR Reporting Process –
Step 7

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module.
Step 2 – Confirm company-issuer association and disassociation.
Step 3 – Download MLR templates.
Step 4 – Populate MLR templates.
Step 5 – Upload completed MLR templates.
Step 6 – Upload supplemental materials.
Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.
Step 8 – View Data
Attesting to the Uploaded Data

• During the attestation process, the CEO and CFO attester are now required to either sign a hard copy or digitally sign a soft copy of the attestation form that is downloaded from HIOS by the company uploader.

• The signed form should then be uploaded into HIOS as a PDF. (Do NOT include the attestation form in the zip file.)

• The form must be signed by both of the designated attesters and uploaded into HIOS in order for the filing to be complete.

• Note: Attesters are NOT required to register or access HIOS MLR to complete the attestation process.
Uploading Attestation Form – Step 1

- Navigate to the ‘Upload’ page.
- Select the “Company” and “Reporting Year”.
- Select **Attestation Form** from the “File Type” drop down.
- Select the “Next” button.
  - If incorrect values were selected in above steps, the user can change values by selecting the ‘**Revisit this step**’ button.
Uploading Attestation Form – Step 2

- Select the ‘**Browse**’ button to browse for a file to upload.

- Select the ‘**Add**’ button to add the file.
  - If incorrect file was selected, select the ‘**Remove**’ button to remove the file. User will need to browse and select file again.
  - Note: No spaces are allowed in the file name.

- Select the ‘**Next**’ button.
Uploading Attestation Form – Step 3

• Review the selected file details (i.e.: Company, Reporting Year, File Type, File selected, Associated States, etc.).

• Select ‘Submit’ button to upload file.

• The system will display confirmation message indicating to the user the file is uploaded successfully.

• The MLR data and supplemental materials have now been attested the filing is complete.
The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module.
Step 2 – Confirm company-issuer association and disassociation.
Step 3 – Download MLR templates.
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Step 5 – Upload completed MLR templates.
Step 6 – Upload supplemental materials.
Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.

Step 8 – View Data
View Data

• This page provides company Uploader and Attester users with the ability to view the uploaded MLR data, Supplemental Material file(s) and Attestation Form.

• The Warnings and Comparison Report also provides users with reports
  – 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 2022 SHCE values and the values reported in the “12/31” columns of the 2022 MLR Annual Reporting Form
Navigate to the ‘View Data’ page.

Select the “Company” and “Reporting Year”.

The uploaded MLR data, Supplemental Material file(s) and Attestation Form will be displayed in the appropriate uploaded data section.
- Only files that have been uploaded and successfully processed will be displayed. If no files have been uploaded and successfully, the applicable data section will provide message indicating such.

The user can download the uploaded data by selecting the link for each document.
View the Warnings and Comparison Report

- Navigate to the ‘View Data’ page.
- Select the “Company” and “Reporting Year”.
- Select the ‘Next’ button.
- Under the MLR Submission section, select the ‘View Report’ link.
- System displays the Warnings and Comparison Report consisting of the following tabs:
  - Validation Warnings Report
  - Grand Total Warnings Report
  - MLR Calculation Warnings Report
  - SHCE/MLR-A Warnings Report
- Users can also export the report by selecting on the ‘Export to Excel’ button.
The MLR reporting process involves the following steps:

- Step 1 – Access the HIOS MLR module. ✓
- Step 2 – Selecting an ORA ✓
- Step 3 – Confirm company-issuer associations and disassociation. ✓
- Step 4 – Download MLR templates. ✓
- Step 5 – Populate MLR templates. ✓
- Step 6 – Upload completed MLR templates. ✓
- Step 7 – Upload supplemental materials. ✓
- Step 8 – Attest to accuracy of uploaded MLR data and supplemental materials. ✓
- Step 9 – View Data. ✓
Contacts & Additional Resources

- Email:
  - MLR policy matters: MLRQuestions@cms.hhs.gov.
  - Technical matters: CMS_FEPS@cms.hhs.gov (Marketplace Service Desk)
- Telephone:
  - Technical matters: 855-267-1515 (Marketplace Service Desk)
- HIOS MLR User Guide:
  - Accessible on the HIOS MLR module via the Related Links and HIOS Knowledge Center. Also posted here: https://www.cms.gov/CCIIO/Resources/Training-Resources/index.html
Organization Role Approver (ORA)

- HIOS implemented a new user role approval process that allows authorized users within the organizations to approve user role requests for their organizations within HIOS. Through Organization Role Approver (ORA) role, these authorized users now can view pending user role requests for their organization and approve or deny the role requests through HIOS Portal.
- Each organization is required to have at least one Primary, and one Backup ORA assigned as per CMS requirements.
- Users can use the “Request a Role” process in the HIOS Portal to obtain the ORA role.
- For a step-by-step guide and additional information see the HIOS ORA Quick Guide. Link is provided in the CMS MLR Issuer Memo.