

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-15
Baltimore, Maryland 21244-1850



DATE: October 12, 2011
TO: Issuers of Health Insurance
FROM: Doug Pennington
Director, CCIIO Web Services Division
SUBJECT: Guidance Regarding Data Submission

This memo provides issuers further guidance on the data submission process for the Health Insurance Oversight System (HIOS) and Rate and Benefit Information System (RBIS).

Will total written premium be displayed on HealthCare.gov?

Total written premium will not be displayed on HealthCare.gov. Total written premium is being collected to calculate the average cost per enrollee, which will be displayed within the HealthCare.gov Plan Finder, corresponding to each small group product represented. The plan is to display the average cost per enrollee as the result of one-third of the quarterly premium divided by the enrollment number. Issuers should report the enrollment as of the last day of the reported quarter into HIOS as well as the total written premium during the reporting quarter into RBIS.

How should riders be entered into RBIS?

Riders should not be reported in the HIOS product level information. When additional riders are available, the coverage options should be marked as “available at an additional cost.” The collected rider premiums should not be reported.

If product categories in HIOS are grouped in a broad sense (i.e. including PPO plans currently being marketed on the street for new business along with older PPO policies which groups can renew upon but aren't available to new business), do issuers only input into RBIS the benefit specifics on the actively marketed plans?

Issuers should input all benefit information for actively marketed small group products into RBIS. Issuers should be cautious, however, to enter the full written premium, representing every covered life reported in the enrollment for a product (including any open and closed plans within a product).

What is the new attestation language for data submission?

The CEO/CFO attestation language now reads:

By selecting "ATTEST", I agree in my capacity as CEO or CFO that I have examined the small group product submission to the best of my information and knowledge, and I believe it accurately represents the benefit and cost sharing information of the reported products based on current template parameters.

The CEO/CFO attestation applies to an issuer's submission including information submitted for the 1103 requirement associated with HealthCare.gov. They are not attesting as to any additional information regarding rate review filings.

What emails are generated to the CEO/CFO (attester)?

At this time, there are 3 emails that are automatically generated to the attester. The first email is generated after the data for the issuer is submitted in HIOS. This email will just notify the attester that data has been submitted and an account has been created in their name, but that the data is not ready for attestation. A second email will be generated to attesters giving them their credentials and providing them information how to activate their account, but that the data is still not ready for attestation. A final email will be sent to attesters and validators indicating that attestation is available. The email will contain instructions for the attester and a link to the HIOS login page.

Does the 1% rule apply to the small group market?

All major medical products in the individual and small group markets should be reported in HIOS. However, issuers are not required to provide RBIS level information for open products which would not constitute 1% of their small group market enrollment in any zip code.

What versions of Microsoft Excel are supported for data submissions?

Currently, we do not support submissions in 2010, only 2003 and XML. The HIOS Instruction Manual has the steps to save and finalize the file in 2003 in Section 4, and the RBIS User Manual provides similar information in Section 16. If issuers still experience any issues, we should encourage them to contact the HIOS Helpdesk to walk them through the process.

For policy questions regarding the HealthCare.gov Plan Finder, please email CCIIOPlanFinder@cms.hhs.gov.

For technical assistance regarding product-level data submissions, please contact the HIOS Help Desk at 1-877-343-6507 or insuranceoversight@hhs.gov.