

Crosswalk:

Question 1: The Plan ID Crosswalk template for 2018 includes fields for the 2017 and 2018 Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filings. These fields are noted as optional at state discretion but I don't see a list of states requiring the completion of these fields in the template instructions or in the current FAQs. Can you please confirm whether or not Pennsylvania is requiring issuers to complete these fields for the 2018 QHP submission?

Answer: The Associated Policy Form Number and NAIC SERFF tracking number fields should be completed in the crosswalk template; this information was also required for plan year 2017.

Pediatric Dental:

Question 1: The benchmark plan for Pennsylvania allows a 24 month waiting period for pediatric orthodontia. CMS revised their policy to no longer allow waiting periods for pediatric orthodontia. How should we address this change when completing our templates?

Answer: In order to comply with this policy revision, the Plan and Benefits template for PY18 must be completed by removing the 24 month limit and select EHB Variance Reason of "Other Law/Regulation" to ensure that the template can validate.

For additional information, please refer to the QHP Certifications Section 5.6 at:

https://www.qhpcertification.cms.gov/s/2018QHPInstructions_041317_PlansandBenefits.pdf?v=1 or the FAQ at <https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/Downloads/Waiting-period-FAQ-05262016-Final-.pdf>

SBC:

Question 1: Do we need to provide the SBC scenarios for off exchange plans? We typically don't provide the SBC URL and the template will validate without both items.

Answer: The SBCs must be submitted as Supporting Documentation at the time of submission of the form filing. Insurers must submit one SBC per issuer for each product type (PPO, POS, EPO and HMO). For products that include plans designed to comply with metal level actuarial value requirements, please submit an SBC for a silver metal level plan.

Templates:

Question 1: We have a question regarding the Network Adequacy template for the 2018 QHP submission. We attend the QHP webinar series that CMS holds twice weekly. On the call today another issue asked CMS if they should only be submitting ECP information on the 2018 Network Adequacy template. CMS responded that issuers must only complete the ECP tab unless they receive direct guidance to complete the other tabs. Can you please confirm if PID requires issuers to complete the other tabs on the QHP Network Adequacy template or is only the ECP information required?

Answer: Please be informed that Pennsylvania requires ALL tabs on the Network Adequacy template to be completed when submitted.

Variability:

Question 1: We offer a product that could be either gatekeeper or nongatekeeper. Can we file this product as one form, using variability to designate between gatekeeper and nongatekeeper?

Answer: We would require this to be filed as two separate product filings, due to the network structure. Variability within forms is limited to cost sharing, and the language to denote gatekeeper vs nongatekeeper would not be permitted to be variable.

Question 2: Are we able to file a SOB that has a variable plan name? The plans have the same cost shares; we would like to make the plan name variable so we would only need to file one SOB.

Answer: We do not permit plan names to be variable. Variability is limited to cost sharing information only.