Health Insurance Exchanges
Plan Management Forum VI

Julie Fritz
Chief Business Strategy and Development Officer
November 27, 2012
Welcome

- ~330 Attendees
- 120 State Insurance Regulators
- 15 Other State Regulators/Contract Regulators
- 25 Federal Regulators
- 140 Non-Regulator/Industry
- 30 Other
Agenda

• CCIIO Regulation/PRA Update
• Data Collection – NAIC and CCIIO
• Exchange Model Implementation Differences
• Project Status
• Consumer Complaint Triage
• SERFF v6.0 Preview
• State Update Panel
Key Objectives

• Show and Tell
  – CCIIO
  – SERFF
General Information

• Breaks (~10:30 and 2:30)
• Lunch (~11:30 – on your own)
• SERFF Plan Management: http://www.serff.com/hix.htm
The material in this presentation should not be viewed as having any independent legal effect, or relied upon as an interpretation or modification of the related proposed rule or statute. Not all issues or exceptions are fully addressed.
Purpose

• Explain the timing of the PRA
• Summarize the rationale for the data being collected
• Describe the intended uses of the data
• Describe the data being collected:
  – Issuer Application
  – Benefit and Service Area
  – Rating Tables and Issuer Business Rules
  – Transitional Reinsurance and Risk Adjustment Operations

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Timing Considerations

- The Qualified Health Plan (QHP), Financial Management (FM), and Federal Operations Paperwork Reduction Act (PRA) package will be finalized by mid-January 2013 to allow for Exchanges and issuers to prepare for data collection activities.

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<td>January 21, 2013</td>
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Why Are these Data Elements Being Collected?

• A QHP must meet certain minimum certification standards including but not limited to:
  – Actuarial value standards
  – Offering of the essential health benefits (EHB)
  – Non-discriminatory benefit designs.

• The data being collected will enable the Exchanges to review and verify that issuers and plans meet the standards and therefore may be certified as qualified health plans.
Intended Uses of the Data

• Issuer application and plan data will support QHP certification in Exchanges, and risk adjustment, reinsurance, and payment operations.

• Specifically, plan-level data is needed to:
  • Support Oversight and Monitoring of QHP Issuers in the Exchanges
  • Facilitate Exchange Operations
  • Ensure Compliance with QHP Certification Standards
  • Support Account Management
  • On-Going Market Analysis
  • Identify Plans Eligible for Reinsurance and Risk Adjustment Programs
## Issuer Application Data and Examples

<table>
<thead>
<tr>
<th><strong>Issuer Administrative Data Elements</strong></th>
<th><strong>State Licensure Documentation</strong></th>
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<tr>
<td>Basic information to identify issuers and the Exchange markets they intend to serve, and to facilitate communications with and payment to issuers.</td>
<td>Attestation and supporting documentation to demonstrate that an issuer is licensed and has authority to sell all applicable products in all states in which it intends to offer a QHP.</td>
</tr>
</tbody>
</table>

- Company legal name
- NAIC Company Code
- Company address
- Issuer address
- CEO name, email, phone
- CFO name, email, phone

<table>
<thead>
<tr>
<th></th>
<th>License and certificate of authority</th>
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</table>
### Issuer Application Data and Examples (cont’d)

<table>
<thead>
<tr>
<th>Documentation of Good Standing:</th>
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<tbody>
<tr>
<td>Documentation to demonstrate that an issuer is in compliance with all applicable state solvency requirements and other relevant state regulatory requirements.</td>
</tr>
<tr>
<td>• State solvency and regulatory compliance documents</td>
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</table>

<table>
<thead>
<tr>
<th>Accreditation Data Elements:</th>
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</thead>
<tbody>
<tr>
<td>Documentation about accreditation conducted by a recognized accrediting entity. Issuer must also authorize the release of accreditation survey data to the Exchange.</td>
</tr>
<tr>
<td>• NCQA and URAC template data</td>
</tr>
<tr>
<td>• Issuer Accreditation attestations</td>
</tr>
</tbody>
</table>
**Issuer Application Data and Examples (cont’d)**

| Network Adequacy Data Elements: QHP issuers must maintain one or more provider networks that are “sufficient in number and types of providers, including providers that specialize in mental health and substance abuse services, to assure that all services will be accessible without unreasonable delay” (45 CFR 156.230). | • Network coverage attestations  
• Network access plans |
| --- | --- |
| Essential Community Provider (ECP) Data Elements: Provider networks must include essential community providers, as described in the next section, and comply with the network adequacy provisions of section 2702(c) of the Public Health Service Act. | • National Provider Number  
• Provider Name  
• Provider Type  
• ECP Type  
• Address |
**Benefit and Service Area Data and Examples**

<table>
<thead>
<tr>
<th>Plan-level Data: Basic plan-level information for plans and products including information for in-network and out-of-network deductibles and maximum out-of-pocket cost by benefit category.</th>
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</thead>
</table>
| • HIOS ID  
• Federal tax ID  
• Plan Marketing Name  
• Network ID  
• Plan Type  
• Coverage Level |

<table>
<thead>
<tr>
<th>Benefits and Associated Cost Sharing and Limits: Data to describe benefits offered by a plan including covered services, co-payments, coinsurance, tiers, and limits.</th>
</tr>
</thead>
</table>
| • Primary Care Visit to Treat an Injury or Illness Covered (Y/N)  
• Quantitative limit on service (Y/N)  
• Limit quantity  
• Limit unit  
• Minimum stay  
• Exclusions  
• Copayment in and out of network  
• Coinsurance in an out of network |
### Summary of Benefits and Coverage Scenario

**Results Data:** Data elements to create the Summary of Benefits and Coverage scenarios for display on the Exchange website.

|having a baby: deductible |
|having a baby: copayment |
|having a baby: coinsurance |
|having a baby: limits |

### Pharmacy Benefit Information

**Formulary data for plans.**

| RxCUI |
| Tier Level |
| Prior Authorization Required |
### Additional Supporting Documentation:
Additional documentation for the Exchange.

- Compliance Plan
- Organization Chart

### Service Area:
Information identifying a plan’s geographic service area.

- Service Area Name
- Zip Code
- County Name
- Partial County Exceptions Narrative

### Network ID:
Information identifying a provider’s network.

- Network Name
- Network URL
Rating Tables Data and Issuer Business Rules Examples

- **Rating Data Information and Issuer Business Rules**: Rating tables and the business rules required to populate the FFE web portal and premium calculator. Examples include:
  - Plan ID
  - Rating Area ID
  - Age
  - Tobacco
  - What are the maximum number of under age dependents used to quote a two parent family?
Transitional Reinsurance, Risk Adjustment, and Payment Operations Data

- Data for reinsurance, risk adjustment, and payment operations include:
  - **Administrative Data Elements**: Basic information to facilitate communications regarding reinsurance contributions and payments, risk adjustment charges and payments, and other financial program payments. The data elements may include issuer contact information and banking information.
  - **State Licensure Data Elements**: Documentation to demonstrate that an issuer is licensed and has authority to sell all applicable products in all states in which they intend to offer plan.
  - **Plan-level and Additional Coverage Data Entities**: Plan information to include market participation, plan type, and basic plan characteristics such as location.
  - **Edge Server Provisioning**: Basic information to register an issuer’s Edge Server to include the host name, contact information, and IP address.

- Data for risk adjustment operations includes:
  - **Plan-level Data**: Actuarial Value (AV) level calculated by the AV calculator.
Exploring Exchange Models

Bridget Kieras
Manager III - SERFF/OPTins

November 27, 2012
Overview of Models

- State Based Exchange (SBE)
- Plan Management Partnership Exchange (SPE/Partnership)
- Full Federally Facilitated Exchange (Full FFE)
State Based Exchange

- State have flexibility in determining when and how to collect plan data.
- Plan management may be jointly administered by DOI and HIX.
- States pursuing an SBE should be working closely with the SERFF PM project team.
Plan Management Partnership

- Some standard templates will be required, others may be optional.
- States may require additional information or data for review processes.
- State has primary responsibility for plan management activities.
- CCIIO will ratify plans before displaying on the federal Exchange portal.
Full Federal Exchange

- Plans will be filed via HIOS; traditional rate & form activities continue in SERFF.
-CCIIO evaluating plans; states reviewing rates and form filings.
- Coordination between HIOS and SERFF will be manual.
Impact on Insurers

• Minimum of two systems for plan submission – SERFF and HIOS.

• For states using SERFF, insurers will see minimal difference in workflow regardless of model.

• Standard templates increase ease of use across states and between systems.
Potential Workflow Model
Key Issues

- Insurers will face more data entry points.
- There is a possibility of variance data requirements.
- Timing of data validation and plan transfers and validation may vary.
Keep up to date on SERFF’s Plan Management project at

http://www.serff.com/hix.htm
Project Status

Joy Morrison
Assistant Director SERFF/OPTins

November 27, 2012
Milestones

• Six forums
• Engaged SBE states in regular conference calls
• Continued efforts with CCIIO
• Completed HIX Phase I
• Released SERFF v5.17
Milestones

• Created blueprint responses for states
• Completed the draft of SERFF’s SSP
• Progress on accreditation integration
Upcoming Milestones

• Data templates
• Completion of SERFF user interface
• Training
QHP Submission Timing

• March 28, 2013 release date
• Alignment with CCIIO milestones
• Support for SBE states
Questions

Keep up to date on SERFF’s Plan Management project at

http://www.serff.com/hix.htm
Exchanges and Complaint Handling

Julie Fritz
Chief Business Strategy and Development Officer
November 27, 2012
The Issue

- Regulatory Oversight
  - Multiple Regulators
  - Confusion re: Regulatory Authority
  - Multiple Entry Points
  - Shared Interest/Need
  - Existing Processes/Systems
Review of Existing State DOI Authority/Processes

- Regulatory Authority/Responsibility
- Definition of Complaints/Inquiries
- Complaint/Inquiry Handling
- Workflow/Systems/Resources
Complaint Triggers

• Exchange
  – Interface
  – Navigators
  – Producers

• Issuer/Qualified Health Plan
  – Benefits
  – Premiums/Rates
  – Claims Handling
DOI Responsibility/Authority

• Issuer/Qualified Health Plan
  – Access to Benefits
  – Access to Providers
  – Access to Pharmacy
  – Premiums/Rates
  – Claims Handling
  – Appeals

• Marketing and Sales
  – Producers
  – Navigators

• Other
  – Privacy
CMS Responsibility/Authority

CMS

- Federal Exchange Portal
- Advanced Premium Tax Credits (APTC)
- Premium Billing (If Billed by FFE)
- Eligibility (in FFE)
Complaint Submission Points

• Exchange
• State Department of Insurance
• State Medicaid Office
• Attorney General/Other State Agency
• Other
Complaint Triage

- Transfer to Appropriate Handling Authority
- Investigation/Disposition
- Complaint Sharing
Potential NAIC Assistance

- Complaints Database System
- State Based Systems (SBS)
Questions?
SERFF v6.0

Thea Cook
Product Implementation Manager
SERFF/OPTins
November 27, 2012
Create a Plan Binder

* Asterisk image denotes required field.

State for Plans: * Alabama

Plan Binder Name: * Please Select

Plan Year: *
- Alabama
- Idaho
- Kansas
- Michigan

# of Plans to Create: * 1

Market Type: * Please Select

Assign Authors: *

schaefer, nan

Next  Cancel
Create a Plan Binder

* Asterisk image denotes required field.

- **State for Plans:** Alabama
- **Plan Binder Name:** NJC Exchange Plans
- **Plan Year:** 2014
- **# of Plans to Create:** 3
- **Market Type:** Please Select
- **Assign Authors:** Please Select
  - Individual
  - Small Group

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Create a Plan Binder

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State for Plans: *Alabama
Plan Binder Name: *NJC Exchange Plans
Plan Year: *2014
# of Plans to Create: *3
Market Type: *Individual
Assign Authors: *

Next  Cancel
Select a Company & Contact

* Asterisk image denotes required field.

**Company for Plans:** *Please Select*

**Contact for Plans:** *Please Select

- Najoco Insurance
- NJC Insurance Company

[Previous] [Next] [Cancel]
Select a Company & Contact

* Asterisk image denotes required field.

Company for Plans: * NJC Insurance Company

Contact for Plans: * Courtney Mayorga
- Please Select
- Courtney Mayorga
- Jon Sink
- Nan Schaefer
## Enter Plan Data & Confirm

- **State:** Alabama  
- **Plan Binder Name:** NJC Exchange Plans  
- **Plan Year:** 2014  
- **Company:** NJC Insurance Company  
- **Contact:** Courtney Mayorga  
- **Market Type:** Individual

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*Asterisk image denotes required field.*
### Enter Plan Data & Confirm

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**Plan Binder Name:** NJC Exchange Plans  
**Plan Year:** 2014  

**Generated Plans**

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<td>Plan 3 Plan 3A- Individual</td>
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**Company:** NJC Insurance Company  
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**Market Type:** Individual
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**Company Name:** NJC Insurance Company

**Plan Binder Name:** NJC Exchange Plans

**Plan Year:** 2014

**Market Type:** Individual

**Authors:** Nan Schaefer

**Date Submitted:** Not yet submitted

**SERFF Tracking Num:** NCJI-125000740

**State Tracking Num:**

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**Plan Year:** 2014

**Market Type:** Individual

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**Date Submitted:** Not yet submitted

**SERFF Status:** Draft

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**State Tracking Num:** NJC-11082012-Indiv

**Company Tracking Num:** NCJI-125000740

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Plan Year: 2014

Authors: Nan Schaefer
Date Submitted: Not yet submitted.

Reviewers: 
SERFF Status: Draft

SERFF Tracking Num: NCJJ-125000740
State Tracking Num: NJC-11082012-Indiv
Company Tracking Num: 
Company Status: Submitted

Schedule Item Search

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Form Schedule Item Name: Form NJC-33221
Rate Schedule Item Name: 
Supporting Document Item Name: 

Search Cancel
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**Form Schedule Item Name:** Form NJC-33221

**Rate Schedule Item Name:**

**Supporting Document Item Name:**

#### Filing Details:

**Product Name:** Individual Health Plan filing

**TOI:**

H151 Individual Health - Hospital/Surgical/Medical Expense

**Sub-TOI:**

H151.001 Health - Hospital/Surgical/Medical Expense

**Filing Type:** Form/Rate

- **Form Number:** SCH
- **Form Type:** Form NJC-33221
- **Action:** Initial

**SERFF Tr Num:** NCJL-128284006

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**Date Submitted:** 11/08/2012

**SERFF Status:** Submitted to State

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#### Supporting Document Items

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- Edit
- Submit
- Delete
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- Administrative Data Template
- Benefit and Cost Sharing Template
- Formulary Data Template
- Rate Data Template

Icon Legend: - Draft Schedule Item

Save  Apply  Cancel
Administrative Data Template
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Attachment Status: Pending Validation
Comments: New Admin

Benefit and Cost Sharing Template
Attachment: QHP Benefit & Cost Share Template.xls
Attachment Status: Pending Validation
Comments: Benefit & Cost sharing

Formulary Data Template
Attachment: QHP FormularyTemplate.xls
Attachment Status: Pending Validation
Comments: Formulary updated as if 11/1/2012

Rate Data Template
Attachment: QHP Rate Template.xls
Attachment Status: Pending Validation
Comments: Rates with banding
Add User Item

**Name:** NJC - Alabama

**Comments:** Supporting document required by AL

**Attachments:**
- [PDF1.pdf](#) [Remove](#)
- [PDF2.pdf](#) [Remove]

**Upload Attachment**

**Icon Legend:** - Draft Supporting Document Item

[Save] [Apply] [Cancel]
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<tbody>
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The Binder has been successfully submitted to Alabama.

Plan Name | Company Plan ID | Metal Level | Actuarial Value | Plan Availability | State Status | M10S Product ID
---|---|---|---|---|---|---
Plan 1A - Individual | 33221 | Bronze | 77.9 | Inside Exchange | | 12345
Plan 2A - Individual | 44332 | Silver | 88.7 | Outside Exchange | | 98776
Plan 3A - Individual | 67843 | Gold | 94.6 | Inside and Outside Exchange | | 39282
# My Plan Binders

## Qualified Health Plan Binders

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<th>Market Type</th>
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<td>Individual</td>
<td>NJC Exchange Plans</td>
<td>Submitted to State</td>
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Company Information

Instance: njcinsuranceco
CoCode: 54854
Company Name: NJC Insurance Company
Address: 1100 Walnut, Suite 1500, Kansas City, Missouri 95465
Telephone Number: (816)783-8990
Fax Number:
Company Type:
Group Code: 654
Group Name:
FEIN Number: 24-7858958
State of Domicile: Missouri
Active: Active
Licensed States:

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Message Detail:
Plan Binder NCJI-125000740 was submitted by Nan Schaefer on 11/08/2012 12:29 PM
### Plan Details

- **Company Name:** NJC Insurance Company
- **Plan Binder Name:** NJC Exchange Plans
- **Plan Year:** 2014
- **Market Type:** Individual

### Plan Information

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**Date Submitted:** 11/09/2012  
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**Amendment Letters**

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### Plan 1A - Individual

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### Plan 2A - Individual

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**Objection Letters:**

- No Objections

**Amendment Letters:**

- No Amendments

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Objection Letter for NCJI-125000740

Dear Courtney Mayorga,

Introduction:

Conclusion:

Sincerely,

<<Letter not submitted yet.>>
Objection Letter for NCJI-125000740

State: Alabama
Plan Binder Name: NJC Exchange Plans
Plan Year: 2014
Market Type: Individual

Company: NJC Insurance Company
Contact: Courtney Mayorga
Authors: nan schaefer
Reviewers:
SERFF Tracking Num: NCJI-125000740
State Tracking Num: AL-11082012-ns
Company Tracking Num: NJC-11082012-Indiv

Objection Letter Date: 11/08/2012
Respond By Date: 

SERFF Status: Draft
State Status: Pending industry response for additional inform

Dear Courtney

Introduction:
Review completed-approved subject to the conditions listed in the comments section of this report.
Review completed-final disposition pending filing fee receipt.
Review period extended additional 30 days per section 27-14-8(b) of the Code of Alabama 1975.
Under review.

Conclusion:

Sincerely,
<<Letter not submitted yet.>>

Attach Files
Save  Apply  Cancel
Dear Courtney Mayorga,

Objection Letter Date: 11/09/2012

Introduction: In reviewing your GHP submission ....

State Status: Pending industry response for additional info

Conclusion: Please respond with ....

Sincerely,

<<Letter not submitted yet.>>

Attachments: Sample 1.pdf
Objection Letter for NCJI-125000740

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**Respond By Date:**
- **SERFF Status:** Draft
- **State Status:** * Pending industry response for additional information/requirements.

Dear Courtney Mayorga,

**Introduction:** In reviewing your QHP submission ......

**Conclusion:** Please respond with ......

Sincerely,

<<Letter not submitted yet.>>

**Attachments:**
- Sample_1.pdf

Submit  Edit  Delete  Close
### Qualified Health Plan Binders

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Objection Letter for NCJI-125000740

State: Alabama
Plan Binder Name: NJC Exchange Plans
Plan Year: 2014
Market Type: Individual

Company: NJC Insurance Company
Contact: Courtney Mayorga
Authors: nan schaefer
Reviewers: nan schaefer

Date Submitted:
SERFF Status: Pending Industry Response

SERFF Tracking Num: NCJI-125000740
State Tracking Num: AL-11082012-ns
Company Tracking Num: NCJC-11082012-Indiv

Objection Letter Date: * 11/08/2012

Respond By Date:
SERFF Status: Submitted
State Status: * Pending industry response for additional information/requirements.

Dear Courtney Mayorga,

Introduction: In reviewing your QHP submission .....
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Create Amendment
Company Name: NJC Insurance Company
Plan Binder Name: NJC Exchange Plans
Plan Year: 2014
Market Type: Individual
Authors: nan schaefer
Reviewers: nan schaefer
Date Submitted: 11/08/2012
SERFF Status: Pending Industry Response
SERFF Tracking Num: NCII-125000740
State Tracking Num: AL-11082012-n
Company Tracking Num: NJC-11082012-Indiv
Company Status: Submitted

Administrative Data Template
Attachment: OHP Administrative Template.xls
Attachment Status: Pending Validation
Comments: New Admin

Benefit and Cost Sharing Template

Formulary Data Template

Rate Data Template

Icon Legend: - Draft Schedule Item
Response to NCJI-125000740

State: Alabama
Plan Binder Name: NJC Exchange Plans
Plan Year: 2014
Market Type: Individual

Company: NJC Insurance Company
Contact: Courtney Mayorga
Authors: nan schaefer
Reviewers: nan schaefer

Date Submitted:

Comment *

Changed Items:

- Administrative Data Template
  Attachment: QHP Administrative Template v2.xls
  Attachment Status: Pending Validation
  Comments:
  Updating per 11/08/2012 objection letter

Previous Version

- Attachment: QHP Administrative Template.xls
  Attachment Status: Pending Validation
  Comments: New Admin
Response to NCJI-125000740

State: Alabama
Plan Binder Name: NJC Exchange Plans
Plan Year: 2014
Market Type: Individual

Company: NJC Insurance Company
Contact: Courtney Mayorga
Authors: nan schaefer
Reviewers: nan schaefer

Date Submitted: Pending Industry Response

SERFF Tracking Num: NCJI-125000740
State Tracking Num: AL-11082012-ns
Company Tracking Num: NJC-11082012-Indiv

Date Submitted:
Comment: Responding to request for revised Admin template

Changed Items:

- Administrative Data Template
  Attachment:
  QHP Administrative Template v2.xls
  Attachment Status: Pending Validation
  Comments:
  Updating per 11/08/2012 objection letter

Previous Version
Attachment: QHP Administrative Template.xls
Attachment Status: Pending Validation
Comments: New Admin
### Response to NCJI-125000740

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<td>Authors</td>
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<td>Reviewers</td>
<td>Bhavani Amirshetty</td>
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| SERFF Status      | Pending Industry Response |

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**Date Submitted:**

**Comment:** Responding to request

**Changed Items:**

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You are about to submit this draft Response Letter.

Are you sure?

[OK] [Cancel]
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<thead>
<tr>
<th>Plan Management General Instructions</th>
</tr>
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<tbody>
<tr>
<td>My Plan Binders</td>
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<table>
<thead>
<tr>
<th>Add Authors</th>
<th>Update</th>
<th>Change Items</th>
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**Company Name:** OCC Insurance Company  
**Plan Binder Name:** OCC Exchange Plans  
**Plan Year:** 2014  
**Market Type:** Individual  
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**Objection Letters**

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**Amendment Letters**

No Amendments

Create Amendment
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## Disposition for Binder NCJI-125000740

**Binder tracking Number:** NCJI-125000740  
**State:** Alabama  
**Company:** NJC Insurance Company  
**Company Tracking Number:** NJC-11082012-Indiv  
**Market Type:** Individual  
**Plan Year:** 2014  
**Binder Name:** NJC Exchange Plans

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<td>Plan 3A - Individual</td>
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**Comments:**

Attach Files

Save  Apply  Cancel
### Plan Management General Instructions

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<td>KansasAH</td>
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<tr>
<td>Michigan</td>
<td>MichiganLAH</td>
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</table>
View the 'AlabamaLife' Plan Management General Instructions

HIX Exchange Support

Plan Management:
- Type of Exchange: State Based
- Accepts EFT: 🙌

General Instructions

This will include any General Instructions that states want to communicate to Insurers for their QHP submissions.

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Essential Health Benefit Services

Ambulatory Patient Services

Essential Benefit Services:
- Chiropractic
- Cosmetic surgery
- Home health care
- Office Visit
- Office Visit (Specialist)
- Outpatient surgery
- Pediatric medical
- Podiatry
- TNU

Notes:

Emergency Services
Keep up to date on SERFF’s Plan Management project at

http://www.serff.com/hix.htm
Health Insurance Exchanges
Plan Management Forum VI

Julie Fritz
Chief Business Strategy and Development Officer
November 27, 2012

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Key Takeaways

- Regulation/PRA Overviews, Details
- Data Collection Overview
- SERFF Plan Management and Implementation re: SBE, PFE, FFE
- SERFF v6.0 Preview
Key Takeaways

- What Can Be Done Now
- EHB Configuration
- Submission of Form Filing/Rate Filings in SERFF, with QHP Designation
- Upcoming Milestones
- Consumer Complaint Triage
General Information

Keep up to date on SERFF’s Plan Management project at

http://www.serff.com/hix.htm