

Instructions for the Plan ID Crosswalk Template

Contents

Instructions for the Plan ID Crosswalk Template.....	1
1. Overview.....	1
2. Plan ID Crosswalk Template Submission Process	1
3. State Authorization of the Plan ID Crosswalk Template.....	3
4. Plan ID Crosswalk Template Data Requirements	3
5. Application Instructions.....	4
5.1 Template Instructions.....	6
6. Frequently Asked Questions.....	14

1. Overview

The Federally-facilitated Marketplace (FFM) Plan ID Crosswalk Template crosswalks 2014 Qualified Health Plan (QHP) plan ID and service area combinations (e.g., Plan ID and County combinations) to a 2015 QHP plan ID. This data will facilitate 834 enrollment transactions from CMS to the issuer in December 2014 for those enrollees who have not actively selected a different QHP during open enrollment at that time.

This Plan ID Crosswalk Template includes cases where an issuer renews coverage, consistent with the guaranteed renewability standards under 45 CFR 147.106(e) and proposed 155.335(j)(1). It also includes cases where an issuer non-renews or discontinues coverage, or continues the product but no longer serves one or more enrollees, consistent with §147.106(c) and proposed 155.335 (j)(2), and selects a plan under a different product offered by the issuer for those enrollees who do not make another plan selection. In all cases, issuers must comply with applicable federal and state law.

For additional information or questions not answered by these instructions, please contact the QHP Application help desk at 855-CMS-1515 or via e-mail at CMS_FEPS@cms.hhs.gov.

2. Plan ID Crosswalk Template Submission Process

This section provides an overview of the Plan ID Crosswalk Template submission process including submission method and key dates. These dates and submission process apply to all issuers that offered individual market QHPs through the FFM in 2014 – including issuers in states performing plan management functions in an FFM. All issuers offering individual market QHPs, including stand-alone dental plans (SADPs), **must** submit one or more Plan ID Crosswalk Templates according to the timeline listed in Table 1 below.

Issuers participating in the Multi-State Plan (MSP) Program are required to complete a separate template for their MSP options and follow a different submission process. OPM will contact MSP Program Issuers directly with these instructions.

Table 1: Key Dates for Submission of Plan ID Crosswalk Template

Note: All dates are subject to change

Activity	Dates (Approximate)
Issuers submit Plan ID Crosswalk Template by 8/7 to “QHP_Applications@cms.hhs.gov”	7/16/2014 – 8/7/2014
CMS reviews template for data integrity validations	8/8/2014 – 8/24/2014
CMS sends 1 st Plan ID Crosswalk Template notice highlighting data integrity errors	8/25/2014
<ul style="list-style-type: none"> • Issuers complete updated version of template • Issuer sends evidence from the state, such as an email confirmation, that the issuer is authorized to submit its Plan ID Crosswalk • Issuers submit updated template by 9/4 to “QHP_Applications@cms.hhs.gov” 	8/25/2014 – 9/04/2014
CMS review of updated template for data integrity validations	9/05/2014 – 9/22/2014
CMS sends 2 nd Plan ID Crosswalk Template notice highlighting data integrity errors	09/23/2014
<ul style="list-style-type: none"> • Issuers complete updated version of template (Only those issuers who need corrections based on state and/or CMS review.) • Issuer sends evidence from the state, such as an email confirmation, that the issuer is authorized to submit its Plan ID Crosswalk • Issuers submit updated template by 10/06 to “QHP_Applications@cms.hhs.gov” 	9/24/2014 – 10/06/2014

Additional information related to the submissions of the Plan ID Crosswalk Template:

- All FFM issuers, including those in states performing plan management functions, **must** submit the Plan ID Crosswalk Template to QHP_Applications@cms.hhs.gov.

CMS overall data integrity review will include but is not limited to an evaluation for compliance with the proposed rule on Annual Eligibility Redeterminations for Exchange Participation and Insurance Affordability Programs as finalized. Note that issuers are

subject to the standards under 45 CFR 156.290 when electing not to seek recertification with the Marketplace.

- Issuers submitted Plan ID Crosswalk Template as of September 4, 2014 will be the data lock down date for issuers for this template. CMS will not be accepting updates from issuers after this date unless CMS or the state found errors with the template. CMS expects that issuers would not remove any 2015 plans seeking QHP certification that are listed in the submitted Plan ID Crosswalk Template after Sept 4, 2014.

3. State Authorization of the Plan ID Crosswalk Template

Issuers are required to submit evidence from the state, such as an email confirmation, that the issuer is authorized to submit its Plan ID Crosswalk. CMS will require this evidence from the issuer by Sept 4th, 2014 and for any subsequent submission after September 4th, 2014. If an issuer does not need to make any changes to their template submitted by August 7th, 2014, then CMS would not require the issuer to resubmit that same template and would only require evidence of state authorization by September 4th, 2014.

States have the opportunity to review the Plan ID crosswalk template for overall approval and for compliance with 2014 the Affordable Care Act market reforms such as uniform modification of coverage standards. States have flexibility to determine the exact method by which they will review the Plan ID Crosswalk Template. For example, a state may:

- Instruct issuers that the State Department of Insurance expects issuers to complete the Plan ID Crosswalk Template in compliance with state law and federal requirements (e.g., guaranteed renewability, uniform modification of coverage) and is consistent with the results of a state's form filing reviews.
- Perform more detailed review to confirm that the submitted Plan ID Crosswalk template is consistent with state and federal requirements and conveys what the state would have expected to see in relation to their form filing reviews.

CMS will not be sending the Plan ID Crosswalk template to states. Issuers may be asked by their state regulators to send this template to them in addition to the submission to CMS (e.g., include the template as part of the NAIC SERFF binder).

4. Plan ID Crosswalk Template Data Requirements

To complete this section, you need the following information:

1. HIOS Issuer ID
2. Issuer state

3. Market Coverage
4. Completed and finalized **2014** Plans & Benefits Template and **2014** Service Area Template.

5. Application Instructions

The Plan ID Crosswalk Template is an Excel template for identifying the 2015 Plan IDs associated with 2014 Plan IDs and associated service areas, as applicable. Figure 1 shows key items in these instructions for completing the Plan ID Crosswalk Template.

All individual market issuers that offered coverage through the FFM in 2014 must complete the Plan ID Crosswalk Template and any required supporting documentation. Issuers should submit separate templates for the following markets:

- Individual market QHPs
- Individual market stand-alone dental plans (SADPs)
- Individual market Multi-State Plans (MSPs).

Issuers participating in the Multi-State Plan Program are required to complete a separate template for their MSP options and follow a different submission process. OPM will contact MSP Program Issuers directly with these instructions.

For plan year 2015, the Federally-facilitated Small Business Health Options Program (FF-SHOP) will not support auto-renewals. Therefore, there is no need to submit a Plan ID Crosswalk template for FF-SHOP plans. Instead, employers wanting to renew (or enroll for the first time) in FF-SHOP QHPs and SADPs must complete an application and enrollment process online at www.HealthCare.gov.

When the template is completed, issuers must email it to QHP_Applications@cms.hhs.gov with the subject title “2014 Plan ID Crosswalk”. Please note: If the XML file name is modified after finalization, CMS cannot process the template.

Figure 1. Plan ID Crosswalk Template Highlights

- Download the latest versions of the Plan ID Crosswalk Template from the Center for Consumer Information and Insurance Oversight (CCIIO) website (<http://cciio.cms.gov/programs/exchanges/qhp.html>).
- To initiate the template to allow data entry, enable template macros using the **Options** button on the Security Warning toolbar, and select **Enable this content**.
- Import your finalized 2014 Plans and Benefits and 2014 Service Area Templates. You must import only one Plans and Benefits Template and one Service Area Template. Issuers must make separate submissions for their MSP and SADP Plans.
- Assign a Crosswalk Level to each Plan ID:
 - Crosswalking to same Plan ID
 - Crosswalking at the Plan ID level
 - Crosswalking at the Plan ID and county coverage level
 - Crosswalking at the zip level for one or more counties
 - Discontinue with no crosswalk
 - Plan withdrawn prior to certification
- If you selected “Crosswalking for one or more counties at the zip level,” select which counties you would like to crosswalk at the zip level from a pre-populated menu.
- Click on “Create ‘2015 Crosswalk Tab’.” This will generate the “2015 Plan Crosswalk” tab in which the user will enter the reason for the crosswalk and the 2015 HIOS Plan ID.
- Enter the Reason for Crosswalk from the following options (note some options may not be available depending on Crosswalk Level entry):
 - Renewing exact same product/plan combination
 - Renewing product; renewal in a different plan within product
 - Continuing product; no plan available in the particular service area under that product; enrollment in a different product
 - Continuing product; no plan available in the particular service area under than product; no enrollment option
 - Discontinuing product; enrollment into a different product
 - Discontinuing product; no enrollment option
- Enter your 2015 HIOS Plan ID for each applicable row.
- Select “Yes” under “Is this 2014 Plan a Catastrophic or Child-Only Plan?” for any Catastrophic or Child-Only Plans being crosswalked.
- Enter the 2015 HIOS Plan ID for enrollees aging off of the Child-Only or Catastrophic plan.
- Click on the “Validate” button on the “2014 Plan Crosswalk” tab. Address any found data errors.
- Review your completed template for accuracy (e.g., ensure all 2014 Plan IDs and Service Area combinations are accounted for).
- Click on the “Finalize” button on the “2014 Plan Crosswalk” tab.

Figure 3. Completed Plan ID Crosswalk Template—2015 Plan Crosswalk Tab

2014 HIOS Plan ID (Standard Component)	County Name	Service Area Zip Code(s)	Crosswalk Level	Reason for Crosswalk	CROSSWALK PLAN		2015 Plan ID for Enrollees Aging off Catastrophic or Child-Only Plan.	2014 Plan ID (Optional at State Discretion)		2015 Plan ID (Optional at State Discretion)		2015 Plan ID (Catastrophic or Child-Only) (Optional at State Discretion)	
					2015 HIOS Plan ID (Standard Component)	Is this Plan a Catastrophic or Child-Only Plan?		Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)
Required	Required: Select the County - FIPS this Service Area covers	Required if Partial County Coverage in 2015: Enter the zip codes in this county that are covered by this Service Area	Based on Option Selected on "2014 Plan Crosswalk" worksheet.	Required: Indicate whether the plan will be renewed to same plan, Crosswalked to similar plan under product, Crosswalked to similar plan under different product, or Product no longer available in Service Area.	Required	Required	Required if Yes Under "Is this Plan a Catastrophic or Child-Only Plan.	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)
12345WY1231111			Crosswalking to same Plan ID	Renewing exact same product/plan combination (Same 2014 Plan ID)	12345WY1231111	No							
12345WY1233333			Crosswalking at the Plan ID level	Renewing product; renewal in a different plan within product	12345WY1236666	Yes	12345WY1234444						
12345WY1234444	Albany - 56001		Crosswalking at the Plan ID and county coverage level	Renewing product; renewal in a different plan within product	12345WY1237777	No							
12345WY1234444	Big Horn - 56003		Crosswalking at the Plan ID and county coverage level	Renewing product; renewal in a different plan within product	12345WY1237777	No							
12345WY1234444	Campbell - 56005		Crosswalking at the Plan ID and county coverage level	Renewing product; renewal in a different plan within product	12345WY1237777	No							
12345WY1234444	Carbon - 56007		Crosswalking at the Plan ID and county coverage level	Continuing product; no plan available in the particular service area under than product; no enrollment option		No							
12345WY1234444	Converse - 56009		Crosswalking at the Plan ID and county coverage level	Continuing product; no plan available in the particular service area under than product; no enrollment option		No							

Complete the following required fields in the Plan ID Crosswalk Template:

2014 Plan Crosswalk Tab

1. Enable template macros using the **Options** button on the Security Warning toolbar, and select **Enable this content**. If macros are not enabled before entering data, the template will not recognize your data and you will have to reenter it.
2. *HIOS Issuer ID* (required). On the 2014 Plan Crosswalk tab, enter your five-digit HIOS issuer ID.
3. *Issuer State* (required). Select the state in which you are offering coverage using the drop-down menu.
4. *Market Coverage* (required): Select the Market Coverage from the drop down menu. Note: This field must indicate “Individual” for plan year 2015. The FF-SHOP Marketplace will not allow auto-renewals for plan year 2015. Because of this, this field will be hard coded to Individual.
5. *Multi-State Plan* (required). Choose from the dropdown to indicate whether this crosswalk template is for OPM Multi-State Plans or not. Choose from the following
 - a. **Yes:** This Plan ID Crosswalk is for the issuer’s multi-state plans.
 - b. **No:** This Plan ID Crosswalk is for the issuer’s non-multi-state plans.
6. *Dental Only* (required if “No” under *Multi-State Plan*): Choose from the drop down to indicate whether this crosswalk template is for dental only plans. Choose from the following:
 - a. **Yes:** This Plan ID Crosswalk template is for stand-alone dental plans (SADP) only.
 - b. **No:** This Plan ID Crosswalk is for QHP plans.
7. *Import 2014 Plans and Benefits and 2014 Service Area*: Click on the button in the upper right corner of the 2014 Plan Crosswalk tab. The template will prompt you to select your completed 2014 Plans & Benefits Template and 2014 Service Area Template. The Plans & Benefits and Service Area templates must be selected at the same time; therefore both templates should be saved in the same folder prior to importing. To select both files, click on one template, and then press the “Ctrl” button while clicking on the other and then click “Open.” You must select exactly one Plans & Benefits Template and one Service Area Template. ***In order to complete this crosswalk accurately, you must use the templates finalized for plan year 2014 and only select one of each template.*** The template will validate the following:
 - a. The issuer must import one Plans & Benefits template and one Service Area Template.

- b. Both Imported Service Area and Plans & Benefits template must have the same issuer ID and state.
- c. The imported Plans & Benefits and Service Area templates must be in excel format and follow respective template formats.
- d. Every Service Area ID in the Plans & Benefits imported template must be accounted for in the Service Area template. If a plan does not have an associated 2014 service area, that Plan ID will not appear on the 2014 Plan Crosswalk Tab.

The template will populate a list of 2014 Plan IDs and their associated service areas on the “2014 Plan and Service Area Data” tab. Review this tab to ensure the data was accurately imported. After the 2014 plan and service area data has been imported, the 2014 Plan Crosswalk tab will be populated with a row for each 2014 Plan ID.

8. *Crosswalk Level (Required)*: Select from the dropdown menu the level at which you would like to crosswalk your 2014 plan. Choose from the following:
 - a. **Crosswalking to the Same Plan ID**: Choose this option if you are crosswalking your 2014 plan to the same plan ID for plan year 2015 and you have no service area changes.
 - b. **Crosswalking at the Plan ID Level**: Choose this option if you have no service area changes but are using a different 2015 plan ID to reflect the same plan.
 - c. **Crosswalking at the Plan ID and county coverage level**: Select this option if your service area changed for the upcoming year and you need to crosswalk your 2014 plan to two or more 2015 plan IDs. Note if your 2014 plan covered the entire state, you will need to crosswalk the plan for every county in the state.
 - d. **Crosswalking at the zip level for one or more counties**: Select this option if your service area changed for the upcoming year and you need to crosswalk your 2014 plan to two or more 2015 plan IDs for the same county. Selecting this option will require you to select the counties from the 2014 plan’s service area that will be crosswalked at the zip code level. The remaining 2014 service area will be crosswalked at the county level.
 - e. **Discontinue with no crosswalk**: Choose this option if you are discontinuing this 2014 plan with no re-enrollment option for its enrollees.
 - f. **Plan withdrawn prior to Certification**: Choose this option if this 2014 plan was withdrawn from the Marketplace prior to certification and has no enrollment. Issuers should also choose this option if the 2014 plan ID listed on the template was not approved by the state or FFM to be offered on the Marketplace in 2014.
9. *Counties Crosswalked at Zip Level (Required if “Crosswalking at the zip level for one or more counties” is selected)*: Choose from the pop-up menu which counties in your 2014 plan’s service area will be crosswalked at the zip code level.

2015 Plan Crosswalk Tab

10. After selecting a Crosswalk level for each 2014 Plan ID, click on the “Create ‘2015 Crosswalk Tab.’” The template will generate the 2015 Plan Crosswalk Tab. The first four columns, “2014 HIOS Plan ID,” “County Name,” “Service Area Zip Codes,” and “Crosswalk Level” will be auto-populated based on your entries in the 2014 Plan Crosswalk Tab. If the user decided to crosswalk at the Plan ID-County level for one or more plans, a row will appear for each county that plan covered in 2014. If the user decided to crosswalk at the zip level for specific counties covered by a 2014 plan, a row for each Plan ID-County-Zip code combination will appear.

Only click this button when you are sure the 2014 Plan Crosswalk tab is complete. If you want to make changes on this tab after the 2015 Plan Crosswalk tab is created, you will need to click the “Create ‘2015 Crosswalk Tab’” button again and start over on the 2015 Plan Crosswalk tab. Clicking the “Create ‘2015 Crosswalk Tab’” button will clear all data you have already entered on the 2015 Crosswalk tab, so copy and paste this information into a separate workbook if you want to save your previous work.

11. *Crosswalk Reason* (Required): Choose from the dropdown menu the reason for the crosswalk. The list of options will depend upon the Crosswalk Level selected. Table 2 lists the possible Crosswalk Reason entries for each Crosswalk Level:
 - a. **Renewing exact same product/plan combination (Same 2014 Plan ID):**
Choose this option if you are crosswalking this Plan ID/Service Area to the exact same HIOS PlanID. Under this option, the template will auto-populate the 2015 Plan ID field with your 2014 Plan ID.
 - b. **Renewing exact same product/plan combination (Different 2015 Plan ID):**
Choose this option if you are crosswalking this Plan ID/Service Area to the same product/plan combination but with a different 2015 Plan ID. See REGTAP FAQ 2392 - “Under what circumstances should a plan continue to use the same HIOS Plan ID from one plan year to the next?” for more details on when it would be appropriate to use this crosswalk reason.
 - c. **Renewing product; renewal in a different plan within product:** Select this option if you are renewing this product, but crosswalking this Plan ID/Service Area to a different plan within the product offered through the FFM. If you choose this option, you must use the same product ID embedded in the plan’s 2014 Plan ID.
 - d. **Continuing product; no plan available in the particular service area under that product; enrollment in a different product:** Select this option if you are continuing this product in 2015 but will no longer offer any plans in part of the service area covered by the product in 2014 and are crosswalking to a plan within a different product offered through the FFM. Select this reason for that portion of the service area that you no longer offer any plans under that product. If you choose this option, you must crosswalk to a 2015 Plan ID with a different product ID from the 2014 Plan ID.

- e. **Continuing product; no plan available in the particular service area under that product; no enrollment option:** Select this option if you are continuing this 2014 product, but there is no plan under this product available to crosswalk to for this plan/service area combination. Select this option as well if you are re-enrolling the consumer into the same product but into a plan offered outside the Marketplace. Choosing this option will disable the 2015 HIOS Plan ID field.
- f. **Discontinuing product; enrollment into a different product:** Select this option if this 2014 product is discontinued for plan year 2015 and enrollees in this plan and associated service area will be re-enrolled in a plan under a different product offered through the FFM. Under this option, the entered 2015 HIOS plan ID must have a different product ID and you may not enter the discontinued 2014 product ID for any other row under the 2015 HIOS Plan ID.
- g. **Discontinuing product; no enrollment option:** Select this option if this 2014 product is discontinued for plan year 2015 and there is no enrollment option through the FFM for 2014 enrollees in this Plan ID/Service Area. Select this option as well if you are discontinuing the product but re-enrolling the consumer into a plan offered outside the Marketplace. Choosing this option will disable the 2015 HIOS Plan ID field. Under this option, you may not enter the discontinued 2014 product ID for any other row under the 2015 HIOS Plan ID.

12. **2015 HIOS Plan ID** (Required): Enter the 2015 HIOS Plan ID you would like to crosswalk your enrollees to for the row’s 2014 Plan ID/Service Area. This field will be auto-populated when “Renewing exact same product/plan combination (Same 2014 Plan ID)” is chosen under the Crosswalk Reason field. This field will be disabled when “Discontinuing product; no enrollment option,” “Continuing product; no plan available in the particular service area under than product; no enrollment option,” is chosen under the Crosswalk Reason field. **Note: Only input 2015 HIOS Plan IDs for plans that will be offered through the Marketplace and are listed in your 2015 QHP Application. CMS will not accept any 2015 Plan IDs for plans only sold outside the Marketplace.**

Please crosswalk 2014 plans to 2015 plans in a manner that is consistent with all final market rules related to Uniform Modification, Annual Eligibility Redeterminations, and Guaranteed Renewability under 45 CFR Parts 147, 155 and 156.

Table 2 lists the Crosswalk Reason and 2015 HIOS Plan entry options for each Crosswalk Level

Table 2: Crosswalk Level, Reason for Crosswalk, and 2015 Plan ID Entry Options

Crosswalk Level	Crosswalk Reason	2015 HIOS Plan ID
Crosswalking to same Plan ID	Renewing exact same product/plan combination (Same 2014 Plan ID) (<i>auto-populated</i>)	Template populates field with 2014 Plan ID. (<i>auto-populated</i>)
Crosswalking at the Plan ID Level	Renewing exact same product/plan combination (Different 2015 Plan ID)	Different Plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same Product ID as 2014 Plan ID

	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	Plan ID with different Product ID from 2014 Plan ID.
	Discontinuing product; enrollment into a different product	Plan ID with different Product ID from 2014 Plan ID.
Crosswalking at the Plan ID and county coverage level	Renewing exact same product/plan combination (Same 2014 Plan ID)	Template populates field with 2014 Plan ID. <i>(auto-populated)</i>
	Renewing exact same product/plan combination (Different 2015 Plan ID)	Different Plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same Product ID as 2014 Plan ID.
	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	Plan ID with different Product ID from 2014 Plan ID.
	Continuing product; no plan available in the particular service area under than product; no enrollment option	2015 HIOS Plan ID field is disabled. <i>(auto-populated)</i>
	Discontinuing product; enrollment into a different product	Plan ID with different Product ID from 2014 Plan ID.
	Discontinuing product; no enrollment option.	2015 HIOS Plan ID field is disabled. <i>(auto-populated)</i>
Crosswalking at the zip level for one or more counties	Renewing exact same product/plan combination (Same 2014 Plan ID)	Template populates field with 2014 Plan ID. <i>(auto-populated)</i>
	Renewing exact same product/plan combination (Different 2015 Plan ID)	Different Plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same Product ID as 2014 Plan ID.
	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	Plan ID with different Product ID from 2014 Plan ID.
	Continuing product; no plan available in the particular service area under than product; no enrollment option	2015 HIOS Plan ID field is disabled. <i>(auto-populated)</i>
	Discontinuing product; no enrollment option.	2015 HIOS Plan ID field is disabled. <i>(auto-populated)</i>
	Discontinuing product; enrollment into a different product	Plan ID with different Product ID from 2014 Plan ID.
Discontinue with no crosswalk	Discontinuing product; no enrollment option.	2015 HIOS Plan ID field is disabled. <i>(auto-populated)</i>
	Continuing product; no plan available in the particular service area under than product; no enrollment option	2015 HIOS Plan ID field is disabled. <i>(auto-populated)</i>
Plan Withdrawn Prior to Certification	Plan Suppressed. No enrollment option. <i>(auto-populated)</i>	2015 HIOS Plan ID field is disabled. <i>(auto-populated)</i>

13. *Is this 2014 Plan a Catastrophic or Child-Only Plan? (Required)*: this field will default to “No.” Please select “Yes” for any Catastrophic or Child-Only Plan being crosswalked.
14. *2015 Plan ID for Enrollees Aging off Catastrophic or Child-Only Plan (Required for Catastrophic or Child-Only Plans)*. Upon selecting “Yes” in the previous column, this field will allow you to enter a 2015 HIOS Plan ID. Enrollees who no longer meet the criteria for continued eligibility in these plans will be crosswalked to the 2015 Plan ID entered in this field.
15. *Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s)*. CMS has included the following optional data fields to be completed if requested by an issuer’s state regulator:
- a. 2014 Plan ID - Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s).
 - b. 2015 Plan ID - Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s).
 - c. 2015 Plan ID (Catastrophic or Child-Only)- Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s).

These data fields will not be included in the xml generated files that an issuer will email to CMS. If a state would like to review the template, they may ask the issuer to complete these fields and send it to them (e.g., include the template excel file as part of the NAIC SERFF binder.)

Validation and Finalization

16. After completing the 2015 Plan Crosswalk Tab, return to the 2014 Plan Crosswalk Tab. Click on “Validate.” The template will review your data entry and inform the user of any validation errors.
17. Review your completed template for accuracy (e.g., all 2014 Plan IDs and Service Area combinations are accounted for). After successfully validating the template, click on the “Finalize” button. The template will export the template into an XML file. Save the XML file to your local computer drive and email it to CMS at QHP_Applications@cms.hhs.gov with the subject title “2014 Plan ID Crosswalk”. Please note: If the XML file name is modified after finalization, CMS cannot process the template.

6. Frequently Asked Questions

Question: After filling data on my 2015 Plan ID Crosswalk I've realized I made a mistake. Can I re-create the 2015 Crosswalk Tab and copy and paste the data I've entered?

Answer: Yes. Please note that clicking on the "Create 2015 Crosswalk Tab" will erase all user entries on the 2015 Crosswalk Tab. The user will be allowed to copy and paste entries into the 2015 Crosswalk tab, however entries under "Crosswalk Reason" must match exactly with one of the dropdown options.

Question: What is the timeline for submitting the Plan ID Crosswalk Template?

Answer: The table below summarizes the schedule for issuers' submission and CMS's review of the Plan ID Crosswalk Template.

Activity	Dates (Approximate)
Issuers submit Plan ID Crosswalk Template by 8/7 to "QHP_Applications@cms.hhs.gov"	7/16/2014 – 8/7/2014
CMS reviews template for data integrity validations	8/8/2014 – 8/24/2014
CMS sends 1 st Plan ID Crosswalk Template notice highlighting data integrity errors	8/25/2014
<ul style="list-style-type: none"> • Issuers complete updated version of template • Issuer sends evidence from the state, such as an email confirmation, that the issuer is authorized to submit its Plan ID Crosswalk • Issuers submit updated template by 9/4 to "QHP_Applications@cms.hhs.gov" 	8/25/2014 – 9/04/2014
CMS review of updated template for data integrity validations	9/05/2014 – 9/22/2014
CMS sends 2 nd Plan ID Crosswalk Template notice highlighting data integrity errors	09/23/2014
<ul style="list-style-type: none"> • Issuers complete updated version of template (Only those issuers who need corrections based on state and/or CMS review.) • Issuer sends evidence from the state, such as an email confirmation, that the issuer is authorized to submit its Plan ID Crosswalk • Issuers submit updated template by 10/06 to "QHP_Applications@cms.hhs.gov" 	9/24/2014 – 10/06/2014

Question: I noticed a county or zip code is not included in the pre-populated rows when I crosswalk a service area by county or zip. How can I account for this county or zip?

Answer: The user may manually enter a row at the bottom of the 2015 Crosswalk tab to account for any county or 5 digit zip not included in the pre-populated rows. Please be sure the entered “2014 HIOS Plan ID”, “County Name”, “Crosswalk Level” and other data fields are consistent with the other rows and data entry for this Plan.

Question: I’m having a problem importing my Plans and Benefits and Service Area Template into the Crosswalk Template.

Answer: Please contact the CMS help desk (CMS_FEPS@cms.hhs.gov) and attach the Plans and Benefits and Service Area Templates you would like imported. Our technical staff will troubleshoot the issue.

Question: We did not offer any plans through the Federally-facilitated Marketplace (FFM) during 2014. We are applying for FFM QHP certification for 2015. Because we didn’t offer any 2014 plans through the FFM do we have to complete the FFM Plan ID Crosswalk template?

Answer: No. The Federally-facilitated Marketplace (FFM) Plan ID Crosswalk template crosswalks 2014 QHP plan ID and service area combinations to a 2015 QHP plan ID. If you did not offer individual market plans through the FFM in 2014 then the Plan ID Crosswalk template does not need to be completed.

Question: How do I upload my Plans and Benefits and Service Area templates into the Plan ID Crosswalk template?

Answer: The Plans and Benefits template must be selected at the same time as the Service Area template; therefore both templates should be saved in the same folder prior to importing. Please make sure the Plans and Benefits template is in .xlsm format and the Service Area template is in .xls format.

Question: Are State-based Marketplace (SBM) states required to use the Federal Plan ID Crosswalk Template?

Answer: The Plan ID Crosswalk Template is required for individual market issuers in FFM states, including states performing plan management. Issuers in SBM states should reach out to their state marketplace contacts to determine what crosswalk documentation is required.

Question: I am offering a SHOP (Small group), Stand Alone Dental Plan, both on and off exchange this year. Is the Crosswalk template applicable to SADP offering a SHOP plan?

Answer: All FFM issuers, including those in states performing plan management functions, should submit the Plan ID Crosswalk Templates for their individual market QHP and SADP plans. For plan year 2015, the Federally-facilitated Small Business Health Options Program (FF-SHOP), including states performing plan management, will not support auto-renewals for SHOP QHPs or SADPs. Therefore, there is no need to submit a Plan ID Crosswalk template for FF-SHOP plans.

Question: We are no longer participating in the individual market Marketplace for a given state for 2015. Do we still need to submit a Plan ID Crosswalk Template?

Answer: Yes, please submit a template. In this case, you would enter “Discontinue with No Crosswalk” under “Crosswalk Level” for each 2014 plan. On the 2015 Crosswalk Tab, you would select “Discontinuing product; no enrollment option.”

Question: The Plan ID Crosswalk template instructions indicate that CMS’ overall data integrity review will include but is not limited to an evaluation for compliance with the proposed rule on Annual Eligibility Redeterminations for Exchange Participation and Insurance Affordability Programs as finalized. How should issuers complete the template given that the first submission is due to CMS by August 7, 2014 and that the final rule has not yet been published?

Answer: Issuers should fill out the Plan ID Crosswalk template according to 45 CFR 155.335 as proposed. As indicated in the template instructions, submissions by August 7, 2014 will be used for the first round of review by CMS. Issuers will have the opportunity to update their Plan ID Crosswalk template and resubmit by September 4, 2014. Prior to September 4, issuers can adjust their Plan ID Crosswalk template as needed based on the rule as finalized.

Question: What validations does the template conduct when the user clicks on the “Validate” button?

Answer: The validations conducted by the template help ensure your Plan ID Crosswalk submission is complete and filled in correctly. These validations will include:

- No required field is left blank. This includes fields that will always require entry (e.g. HIOS Issuer ID) and fields that require entry given another field’s value (e.g. If the selected “Crosswalk Level” is "Cross walking for one or more counties at the zip level" then the “Counties Crosswalked at Zip Level” field must not be empty.)
- All entries in the “Crosswalk Reason” field must be compatible with the selected Crosswalk Level entries. See Table 2 above for a list of available Crosswalk Reasons for each Crosswalk Level.
- All entries on shared fields across the 2014 Plan Crosswalk tab and 2015 Plan Crosswalk tab match appropriately.
- The “County Name” field on the 2015 Plan Crosswalk tab must be blank if the entry for the “Crosswalk Level” field is one of the following:
 - Crosswalking to same Plan ID
 - Crosswalking at the Plan ID level
 - Discontinue with no crosswalk
- The “Service Area Zip Code” field on the 2015 Plan Crosswalk tab must be blank if the entry for the “Crosswalk Level” field is one of the following:
 - Crosswalking to same Plan ID
 - Crosswalking at the Plan ID level
 - Discontinue with no crosswalk
 - Crosswalking at the Plan ID and county coverage level

- The 2015 HIOS Plan ID must match the 2014 HIOS Plan ID when the user selects “Crosswalking to the same Plan ID” under “Crosswalk Level.”
- The 2015 HIOS Plan ID must be empty if the user has the following entries in the Crosswalk Reason field:
 - Continuing product; no plan available in the particular service area under that product; no enrollment option.
 - Discontinuing product; no enrollment option.
 - Plan Suppressed.. No enrollment option.

Question: What validations will be conducted as part of CMS’s data integrity checks?

Answer: CMS’ overall data integrity review will include but is not limited to an evaluation for compliance with the proposed rule on Annual Eligibility Redeterminations for Exchange Participation and Insurance Affordability Programs as finalized. Specifically, CMS will review of submitted templates will include but is not limited to the following:

- All counties covered in 2014 plans’ service areas are accounted for in the crosswalk.
- All 2015 enrollment options for a 2014 plan are crosswalked to a valid 2015 plan that is offered in that county and meets requirements.
- The entries in the “Crosswalk Reason” field are consistent with the “2015 HIOS Plan ID” entry and that all Crosswalk Reason entries are accurate. For example, if the crosswalk reason is “Continuing product; no plan available in the particular service area under that product; enrollment in a different product,” CMS will validate that there really is no plan in the 2014 product available in that county, and that the 2015 crosswalk plan is in a different product.
- Every 2014 plan has been properly crosswalked to a 2015 plan consistent with the proposed rule on Annual Eligibility Redeterminations for Exchange Participation and Insurance Affordability Programs. CMS will check to make sure plans are crosswalked using the following hierarchy:

If any plan associated with the 2014 product remains available through the Marketplace for 2015 then:

- If the same Plan ID is available in 2015, the 2014 Plan ID should be crosswalked to the same Plan ID.
- If the same Plan ID is not available, the 2014 plan should be crosswalked to a plan with the same metal level and Product ID.
- If a plan with the same metal level and Product ID is not available for 2015, the 2014 plan should be crosswalked to a plan with the same Product ID and with a metal level that is either 1 level lower or higher than the 2014 plan’s metal level.

- If a plan with the same Product ID and with a metal level that is either 1 level lower or higher than the 2014 plan is not available for 2015, the 2014 plan should be crosswalked to a plan with the same Product ID.

If no plan associated with the 2014 product is available through the Marketplace for 2015 then:

- If a plan with the same Product ID is not available for 2015, the 2014 plan should be crosswalked to a plan with the same metal level.
- If a plan with the same metal level is not available for 2015, the 2014 plan should be crosswalked to a plan with a metal level that is either 1 level lower or higher than the 2014 plan's metal level.
- If a plan with a metal level that is either 1 level lower or higher than the 2014 plan is not available for 2015, the 2014 plan should be crosswalked to any available on-exchange plan.
- If no plans are available through the Exchange for 2015, the issuer may re-enroll the enrollee into a plan offered outside the Exchange by the QHP issuer as noted in the proposed rule. However, issuers should not submit off Exchange Plan IDs in the Plan ID Crosswalk template. Rather, please refer to the crosswalk reason discussion above for when to select "no enrollment option." Note that the Exchange will not send an enrollment transaction for an enrollment outside the Exchange, and that premium tax credits and cost sharing reductions are not available for enrollment that is not through the Exchange.

Upon completion of CMS's data integrity review, issuers will receive notice of any errors found and will be asked to resubmit their revised template.

Question: If a health insurance issuer elects to discontinue offering a product (as defined in 45 CFR 144.103) in the group or individual market, may the issuer auto-enroll individuals covered under that product into a product of another licensed issuer?

Answer: No. Section 2703(c) of the Public Health Service (PHS) Act and 45 CFR 147.106(c) provide that, in any case in which an issuer decides to discontinue offering a particular product offered in the group or individual market, that product may be discontinued by the issuer in accordance with applicable State law in the applicable market only if certain requirements are met. Among the requirements for product discontinuation is that the issuer must offer to each plan sponsor or individual provided that particular product the option to purchase, on a guaranteed availability basis, any other health insurance coverage offered by the issuer in that market. An issuer does not satisfy the requirement to offer other health insurance coverage currently being offered "by the issuer" if it auto-enrolls consumers into a product of another issuer that is separately licensed to engage in the business of insurance in a State.

Nothing in the PHS Act or the regulations under the PHS Act prevents an issuer that elects to discontinue offering all health insurance coverage in a market (market withdrawal under 45 CFR

147.106(d)) from auto-enrolling affected individuals into a product of another licensed issuer, to the extent permitted by applicable State law.

Issuers are required to follow this guidance when completing the Plan ID Crosswalk template. As a reminder, this template will be used by the Federally-facilitated Marketplace (FFM) to automatically renew or re-enroll existing enrollees into 2015 coverage. As part of CMS' data integrity review of the Plan ID Crosswalk template, CMS will notify the issuer of any cases where a 2014 QHP or SADP¹ is crosswalked to a 2015 plan ID that uses a different issuer ID. In these cases, CMS will require evidence from the state, such as an email confirmation, that the issuer is permitted to crosswalk plans in this manner. This evidence must include specific justification for the plans in question (e.g., issuer has elected to discontinue offering all health insurance coverage in a market).

Question: Are issuers required to provide a Plan-ID Crosswalk Template for Off-Exchange Plans?

Answer: All FFM issuers, including those in states performing plan management functions, should submit to CMS the Plan ID Crosswalk Templates for their individual market QHP and SADP plans sold through the FFM in 2014. Issuers should not submit to CMS a Plan ID Crosswalk Template for any plans sold solely outside of the FFM (i.e., also commonly referred to as "off-Exchange plans").

¹ While stand-alone dental QHPs are excepted benefits and therefore not subject to the guaranteed renewability requirements, CMS will apply this guidance for operational purposes when performing data integrity review of the Plan ID Crosswalk template.