

2020 Virginia ACA Rate Filing Season Carrier Teleconference

Today's topics include:

- ▶ Important Dates
- ▶ Virginia Legislation
- ▶ Virginia Rate Filing Template Changes
- ▶ Virginia Rate Sheet

Important Dates

- ▶ April 19: Form filing deadline for ALL ACA health carriers (excludes SADPs)
- ▶ May 3: Form and rate filing deadline for carriers submitting SADPs to be exchange-certified
- ▶ May 17: Binder filing deadline for carriers offering SADPs to be exchange-certified
- ▶ May 24: Rate filing deadline for ALL ACA health carriers
- ▶ May 24: Binder filing deadline for carriers offering individual and small group health insurance coverage inside or outside the exchange

Important Dates

- ▶ May 31: SERFF public access suspended for health form, rate, and binder revisions made on or after this date through July 10th
- ▶ July 10: Deadline for voluntary service area revisions and rate filing revisions; revisions after this date can be made based only at request of BOI
- ▶ July 18: Rate presentations to the Commission (tentative date)
- ▶ August 21: Deadline for data transfer to CMS

Virginia Legislation

- ▶ HB 2345: Codifies certain provisions of Virginia's minimum loss ratio regulation and rate review authority (effective 7/1/19)
- ▶ HB 2719 (SB 1475): Modifies definition of "small employer" to include joint owners of a corporation and partners of an LLC (effective 7/1/19)
- ▶ HB 2770 (SB 1734): Places restrictions on rating area factors in the individual and small group ACA markets (applies to rate filings for the 2020 and subsequent plan years)

Virginia Rate Filing Template Changes

- ▶ Capitation has been added to the historical experience exhibit (Form 130A tab)
- ▶ Rate Presentation exhibit has been revised and combined into a new tab (Consumer Factors & Rate Presentation)
- ▶ Adjustment factor has been added to accommodate small group quarterly rates
- ▶ Several previously required entries have been deleted
- ▶ Two Rate Filing Templates, one for 2019 approved rates and one for 2020 proposed rates, must be completed and submitted by the rate filing deadline of May 24
- ▶ Template must be submitted under Supporting Documentation in SERFF

Virginia Rate Sheet

- ▶ Proposed rates are generated by the Rate Filing Template and are located in the Rate Sheet tab
- ▶ Rate Sheet must be printed to a PDF file using “Print” button in tab
- ▶ Rate Sheet must be submitted under Rate/Rules Schedule in SERFF
- ▶ One Rate Sheet PDF per carrier and market

Important Links

- ▶ General ACA Rate Filing Information:
<https://www.scc.virginia.gov/boi/co/acafilinginfo/index.aspx>
- ▶ 2020 Plan Year Implementation Calendar:
<https://www.scc.virginia.gov/boi/co/health/files/planyear.pdf>
- ▶ Rate Review Requirements Checklist:
<https://www.scc.virginia.gov/boi/co/health/check/lhratereview.pdf>.
- ▶ Rate Filing Template and Instructions, URRT, NAIC Product Checklist:
https://www.scc.virginia.gov/boi/co/health/lh_check.aspx.
- ▶ Health Related Bills: <https://lis.virginia.gov/>.

Binder Filing Reminders

- ▶ The binder filing deadline for SADPs is May 17th, and for Individual and Small Group coverage inside and outside the exchange the binders must be filed by May 24th.
- ▶ However, any carrier who wants to take advantage of the early bird transfer, must submit the binders no later than May 17th.
- ▶ Carriers are strongly encouraged to run the appropriate review tools provided by CMS prior to submission of a binder, and prior to each submission of any revised templates. These tools are designed to guard against incorrect information being provided on Healthcare.gov. Should the carrier make it a practice of submitting templates in the binder (i) that contain errors that were identifiable through the review tools provided by CMS, or (ii) without performing adequate reviews to identify inconsistencies between the information in the templates (that is ultimately posted on Healthcare.gov) and the corresponding forms, these actions may be determined to be a violation of § 38.2-503 of the Code of Virginia, which may result in monetary penalties against the carrier. The review tools and instructions may be found at:
<https://www.qhpcertification.cms.gov/s/Review%20Tools>.

Binder Filing Reminders

- ▶ Beginning with Plan Year 2019, the Virginia Plan Schedule Comparison was included as a tab on the VA Rate Filing Template for all individual and small group plans inside and outside the exchange, so carriers are not required to complete a separate Virginia Plan Schedule Comparison document. However, SADP carriers must still complete the Virginia Plan Comparison and attach it under Supporting Documentation in each binder.
- ▶ Binder filings must include complete information in the Associate Schedule Items (ASI) tab to include all forms and rates filed for each plan. Each form must include a valid link to the actual form submission. Each plan must include a link to a valid rate submission. For carriers who use a different filing instance and are not able to complete this tab, a separate document presenting the same information as in the ASI tab must be submitted under Supporting Documentation in the binder, and must be kept updated. The ASI tab must be kept updated with current form and rate filings.
- ▶ The VA Rate Filing Template should be attached under the Supporting Documentation in each binder. The rate sheet should be attached under Associate Schedule Items and linked to the corresponding rate filing for each plan.