

**Key Dates for Calendar Year 2016<sup>1</sup>:  
QHP Certification in the Federally-facilitated Marketplaces<sup>2</sup>;  
Rate Review; Risk Adjustment and Reinsurance**

**QHP Certification<sup>3</sup>**

Activity		Dates
QHP Application Submission and Review Process	Initial FFM QHP Application Submission Window <sup>4</sup>	4/11/2016 – 5/11/2016
	First SERFF Data Transfer Deadline for States Performing Plan Management	5/11/2016
	CMS Review of Initial QHP Application Submissions Received as of May 11	5/12/2016 – 6/10/2016
	First Correction Notice Sent to Issuers	6/15/2016 – 6/16/2016
	Deadline for Submission of Revised QHP Data for Re-review; Second SERFF Data Transfer Deadline for States Performing Plan Management	6/30/2016
	CMS Review of Revised QHP Application Submissions Received as of June 30	7/1/2016 – 8/2/2016
	Second Correction Notice Sent to Issuers	8/8/2016 – 8/9/2016
	Final Deadline for Submission of QHP Data; Deadline for All Risk Pools with QHPs to be in a final status in the URR System <sup>5,6</sup> ;	8/23/2016
	Final CMS Review of Revised QHP Application Submissions Received as of August 23	8/24/2016 – 9/9/2016
Certification Notices Sent to Issuers		9/15/2016 – 9/16/2016

<sup>1</sup> This document summarizes key dates for calendar year 2016 regarding some activities and policies that are outlined in other documents -- *2017 Letter to Issuers in the Federally-facilitated Marketplaces* (February 29, 2016), the *Patient Protection and Affordable Care Act; HHS Notice of Benefit and Payment Parameters for 2017*; (February 29, 2016), and the *Bulletin: Timing of Submission and Posting of Rate Filing Justifications for the 2016 Filing Year for Single Risk Pool Coverage Effective on or after January 1, 2017* (February 29, 2016).

<sup>2</sup> Includes QHPs in States Performing Plan Management Functions

<sup>3</sup> QHP certification information from the *Draft 2017 Letter to Issuers in the Federally-facilitated Marketplaces* (December 23, 2015), available at: [https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Health Insurance Marketplaces](https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Health_Insurance_Marketplaces).

<sup>4</sup> An initial QHP Rates Table Template must be submitted by the end of the Submission Window even if the submission is for products offered in a State with an Effective Rate Review Program that has a later Rate Filing Justification submission deadline. Rate Filing Justification and Form Filing submissions to CMS in States in which CMS is either the Effective Rate Reviewer or direct enforcer of the Affordable Care Act federal reforms follow the same Initial Submission Window and Deadline as the QHP Initial FFM QHP Application Submission Window. This submission deadline applies to Rate Filing Justification and Form Filing submissions for single risk pool coverage (including QHPs and non-QHPs).

<sup>5</sup> There are three final submission statuses in HIOS. All submissions that do not have any rate increases subject to review (rate increase less than 10%) must be in a status of "Rate Filing Accepted." For submissions with rate increases that are subject to review (rate increase of 10% or greater), the submission must be in a status of "Review Complete" if the rate increase received a determination of "not unreasonable," or in a status of "Final Justification Submitted" if the rate increase received a determination of "unreasonable" and the issuer has submitted the final justification.

<sup>6</sup> All risk pools that only have non-QHPs must be in a final status in the URR system by October 7, 2016.

Activity		Dates
QHP Agreement/Final Certification	Agreements Signed by Issuers and Returned to CMS with Final Plan List	9/19/2016 – 9/23/2016
	Validation Notice Confirming Final Plan List and Countersigned Agreements Sent to Issuers	10/3/2016 – 10/4/2016
Open Enrollment		11/1/2016 – 1/31/2017

### Rate Review for Single Risk Pool Plans<sup>7,8</sup>

Activity	Dates
Submission deadline for all Rate Filing Justifications in the single risk pool (QHP and non-QHP) for issuers in a State without an Effective Rate Review program into the URR module	5/11/16
Initial proposed rate change information available for States without an Effective Rate Review program <sup>9</sup> for consumer review on <a href="https://ratereview.healthcare.gov">https://ratereview.healthcare.gov</a> <sup>10</sup>	5/25/16
Submission deadline for all Rate Filing Justifications in the single risk pool (QHP and non-QHP) for issuers in a State with an Effective Rate Review program into the URR module (unless a State sets an earlier deadline) <sup>11</sup>	7/15/16
Deadline for States with an Effective Rate Review Program to publicly post proposed rate increases subject to review (unless a State sets an earlier deadline)	8/1/16
Deadline for all Rate Filing Justifications in the single risk pool with QHPs to be in a final status in the URR system	8/23/16
Deadline for all Rate Filing Justifications that only have non-QHPs to be in a final status in the URR system	10/7/16
Target date to post Public Use File with final rate data for QHPs and non-QHPs	11/1/16

<sup>7</sup> Rate review dates from the *Draft 2017 Letter to Issuers in the Federally-Facilitated Marketplace* (December 23, 2015), at: [https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Health Insurance Marketplaces and DRAFT Bulletin: Timing of Submission and Posting of Rate Filing Justifications for the 2016 Filing Year for Single Risk Pool Coverage Effective on or after January 1, 2017](https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Health%20Insurance%20Marketplaces%20and%20DRAFT%20Bulletin%20Timing%20of%20Submission%20and%20Posting%20of%20Rate%20Filing%20Justifications%20for%20the%202016%20Filing%20Year%20for%20Single%20Risk%20Pool%20Coverage%20Effective%20on%20or%20after%20January%201%20%202017) (December 23, 2015), at [https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Review of Insurance Rates](https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html#Review%20of%20Insurance%20Rates).

<sup>8</sup> The term “single risk pool plan” is used to describe non-grandfathered health insurance coverage in the individual or small group (or merged) market that is subject to all of the single risk pool provisions at 45 CFR 156.80 and required to submit rate information using the Unified Rate Review Template.

<sup>9</sup> Missouri, Oklahoma, Texas, and Wyoming are States without an Effective Rate Review program as of April 2016.

<sup>10</sup> As stated in the 2017 Payment Notice, CMS will post information for all single risk pool coverage proposed rate filings (not just those subject to review).

<sup>11</sup> As stated in the 2017 Payment Notice, this deadline extends beyond rate increases and also includes single risk pool coverage that experiences no rate changes, rate decreases, as well as rate for new single risk pool coverage.

## Risk Adjustment and Reinsurance for Benefit Year 2015<sup>12</sup>

Activity	
First Bifurcated or Combined Reinsurance Contribution Amount Due	1/15/2016
Interim Reinsurance Payment <sup>13</sup>	3/2016 – 4/2016
Interim Risk Adjustment Report <sup>14</sup>	3/2016
Deadline for Submission of Final Risk Adjustment/Reinsurance Data <sup>15</sup>	5/2/2016
Risk Adjustment and Reinsurance Summary Report Released	6/30/2016
Remittance and Collection of Risk Adjustment and Reinsurance Payments and Charges	Begins 7/2016
Second Bifurcated Reinsurance Contribution Amount Due	11/15/2016

<sup>12</sup> Risk Adjustment, Reinsurance, and Risk Corridors dates from the regulations at 45 CFR Part 153.

<sup>13</sup> <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/Downloads/Early-Reinsurance-Guidance-Final-10-09-15.pdf>.

<sup>14</sup> [EDGE Data Evaluation for Interim Reinsurance Payments and Interim Risk Adjustment Report](#)

<sup>15</sup> See FAQ 14472, available at [www.regtap.info](http://www.regtap.info).