Interim Reinsurance (RI) Outlier Analysis Computer-Based Training (CBT) Text-only Version

1.1 REINSURANCE PAYMENTS SERIES II: Interim RI Outlier Analysis

Welcome to the text-only version of the Reinsurance Payments Series II Interim RI Outlier Analysis Computer-Based Training or CBT.

1.2 Intended Audience

The intended audience for this training includes Issuers of Marketplace and Non-Marketplace plans eligible for the Transitional Reinsurance Program, Third Party Administrators, or TPAs, and Support Vendors and Amazon and On-Premise EDGE server issuers.

1.3 Purpose

The purpose of this training is to provide issuers and TPAs information on the analysis and associated criteria that the Centers for Medicare & Medicaid Services (CMS) will use to determine eligibility for the interim RI payment for the 2015 Benefit Year.

1.4 Topics to Cover

This training will cover the following topics: Overview for the 2015 Benefit Year and Determining Eligibility. Resources are provided at the end of this document, along with a short Knowledge Assessment Quiz to test your knowledge on what you have learned from the training.

2. Interim RI Payment: Overview for the Benefit Year 2015

2.1 Overview

As noted in the December 3, 2015 Interim Reinsurance Payments webinar, CMS will remit interim RI payments for the 2015 Benefit Year to issuers who meet certain data quality requirements. The interim payments are an advance of a portion of issuers' total RI payments for the 2015 Benefit Year. Parameters for the 2015 interim RI payment are: an RI attachment point of \$45,000; an RI cap of \$250,000 and a 25% coinsurance rate. CMS required issuers to submit claims and enrollment data in order to be considered for the interim RI payments by February 1, 2016.

The interim RI payment amount is based on Reinsurance Summary Report (RISR) data from the February 2, 2016 EDGE command deployment. CMS conducted an initial and a final round of outlier analysis to determine eligibility for interim RI payments. The formal appeals process is not applicable to interim RI payments. Therefore, issuers cannot appeal any CMS decision regarding the interim payment amount. Also, no sequestration or appeals holdback is applied to the interim payment.

The interim RI payments will not impact the total amount of RI payments issuers receive for the 2015 Benefit Year. In addition, the interim RI payments will not affect the timing of remittance of final RI payments and will not impact the current 2015 Benefit Year EDGE server data reporting schedule located in the REGTAP Library under the DDC program area. After the final May 2, 2016 EDGE data submission deadline, the interim RI payment will be reversed and replaced with the final RI payment.

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3. Interim RI Payment: Determining Eligibility

3.1 Eligibility Criteria

Issuers must meet the two (2) standard EDGE data sufficiency metrics for Reinsurance, based on data loaded on the server as of February 1, 2016, in order to be eligible for interim RI payments. One (1), the average RI payment per enrollee receiving RI payment, and two (2), the percent of individual market enrollees with RI payments. Issuers identified as an outlier in either or both of those metrics without justification, forfeit interim RI payments.

Issuers identified as outliers in the initial analysis must do one of the following to receive an interim RI payment. Provide CMS with critical justification of relevant data anomalies to EDGEDataReply@cms.hhs.gov by Wednesday, February 10, 2016 or update data loaded onto the EDGE server by February 1, 2016.

The last day for issuers, regardless of outlier status, to submit data to the EDGE server for interim RI payment consideration was February 1, 2016. The final decision on which issuers who do not meet data quality standards for interim RI payments is based on the final data quality review. CMS requires all issuers, including issuers excluded from interim RI payments, to continue to submit data to the EDGE server by the May 2, 2016 EDGE submission deadline as part of the standard EDGE data reporting process. In addition, all issuers are responsible for meeting other data quality metrics not related to interim RI payments.

3.2 Outlier Analysis – Metric Calculation

Initial and final outlier analysis used to determine eligibility for interim RI payments for the 2015 Benefit Year will use the same metrics, calculated as follows. To determine the percent of individual market enrollees receiving RI payments, issuers should divide the Total Incurred Claims data element by the number of Unique Enrollee IDs data element, both located in the Reinsurance Summary. To determine the average RI payment per enrollee receiving an RI payment, issuers should divide the estimated RI payment by the total incurred claims.

3.3 Further Guidance on Data Quality

Issuers can locate additional documents on the EDGE server data quality standards and processes for the 2015 Benefit Year by visiting the CCIIO website at https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Evaluation of EDGE Data Submissions for 2015 Benefit Year for Interim Reins urance Payments and Interim Risk Adjustment S.pdf.

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4. Knowledge Check

4.1 Knowledge Check Quiz

Welcome to the Knowledge Check quiz.

True or False. The formal appeals process is applicable to interim RI payments. Therefore, issuers can appeal any CMS decision regarding the interim RI payment amount.

The answer is false. The formal appeals process is not applicable to interim reinsurance payments, and therefore issuers cannot appeal any CMS decisions regarding the interim payment amount.

Fill in the blank. All issuers, regardless of outlier status of eligibility for interim RI payments, should continue to submit data to the EDGE server by the final ______ deadline as part of the standard EDGE server data reporting process.

The correct answer is May 2, 2016. Issuers should continue to submit data to the EDGE server by the final May 2, 2016 deadline as part of the standard EDGE server data reporting process.

True or False. Issuers must meet the standard two (2) RI data sufficiency metrics to be eligible for interim RI payments.

The correct answer is true. Issuers must meet the two (2) standard sufficiency metrics in order to be eligible for interim RI payments.

5. Resources

5.1 Resources

In addition to the resources mentioned during this training, HHS maintains several resources with general guidance for any organization working with exchanges.

5.2 Locating Reinsurance Documents in REGTAP

Stakeholders can access additional documents in the REGTAP Library at https://www.REGTAP.info. To access additional documents in the REGTAP Library select 'Reinsurance' under Program Area.

5.3 Inquiry Tracking and Management System (ITMS)

REGTAP Users can submit questions to the Inquiry Tracking and Management System by selecting 'Submit an inquiry' on their REGTAP Dashboard. Please enter one (1) question per submission, and please link your inquiry to the Reinsurance Payments Series II training series.

5.4 FAQ Database on REGTAP

REGTAP has a searchable FAQ Database which allows users to search FAQs by FAQ ID, Keyword or Phrase, Program Area, Primary and Secondary Categories and Publish Date. The FAQ Database is accessible by selecting the FAQs button on your REGTAP dashboard.

6. Conclusion

Thank you for reviewing the Reinsurance Payments Series II Interim RI Outlier Analysis CBT text-only file. For information regarding additional webinars, please log onto REGTAP at https://www.REGTAP.info for registration details and discussion topics.