

Arkansas Insurance Department

Asa Hutchinson
Governor



Allen Kerr
Commissioner

August 16, 2017

BULLETIN NO. 14-2017

TO: ALL LICENSED INSURERS, HEALTH MAINTENANCE ORGANIZATIONS (HMOs), FRATERNAL BENEFIT SOCIETIES, FARMERS' MUTUAL AID ASSOCIATIONS OR COMPANIES, HOSPITAL MEDICAL SERVICE CORPORATIONS, NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS, PRODUCER AND COMPANY TRADE ASSOCIATIONS, AND OTHER INTERESTED PARTIES

FROM: ARKANSAS INSURANCE DEPARTMENT

SUBJECT: 2018 PLAN YEAR RATE FILING REQUIREMENTS AMENDMENT

On April 6, 2017, the Arkansas Insurance Department (AID) published Bulletin 3-2017, 2018 Plan Year Requirements for Qualified Health Plan Certification, which gave certain dates that rates had to be submitted to AID and the Centers for Medicaid and Medicare Services (CMS). On August 10, 2017, CMS released a subsequent FAQ extending the deadline for rate filing submissions due to the uncertainty of continued payments of cost sharing reductions (CSR). As such, AID is modifying the submission timetable related to rates to be reflective of the CMS deadlines.

Updated Tentative Rate Approval and Associated QHP Certification Timeline

| 2017 Key Dates | Description |
|-------------------------|--|
| August 21, 2017 | Issuers submit modified 2018 rate filings to AID |
| September 5, 2017 | Issuers deadline to submit modified 2018 rate filings (QHPs and non-QHPs) to CMS |
| September 6 - 19, 2017 | CMS reviews modified QHP 2018 rate filings |
| September 21 - 25, 2017 | States or CMS submit final determinations on 2018 QHP rate filings to URR module in HIOS |
| October 6, 2017 | States and CMS submit final determinations on 2018 non-QHP only rate filings to URR module in HIOS |
| September 27, 2017 | Deadline for Issuers send signed Agreements, confirmed plan lists and final Plan Crosswalks to CMS. Deadline for Arkansas to confirm recommendation to CMS |
| November 1, 2017 | Rates posted on https://ratereview.healthcare.gov and Open Enrollment Begins |

Should an issuer seek to modify its 2018 rate filings, the issuer should submit the modification under a new SERFF filing number a new Unified Rate Review Template (URRT), Actuarial Memorandum, and, if any of the plans have a rate increase of 10% or more, the Consumer Justification Narrative. The filing should also note that it is an amendment of a prior filing. These modifications must be clearly marked as "2018 Rate Filing Assuming No CSR" and nothing other than changes to the original filing shall be permitted. Issuers applying for QHP Certification may only make changes to the URRT in their binders unless otherwise notified by Arkansas or CMS.

AID intends to complete the rate review as to rates that were initially sent under the assumption that CSR was to be included in addition to the review of the modified rates. Should CSR payments not be authorized by the federal government by October 6, 2017, the modified rate filings will be denied.

Direct your inquiries to the Regulatory Health Link Division at (501) 683-4170.



ALLEN KERR
INSURANCE COMMISSIONER
STATE OF ARKANSAS

August 16, 2017
DATE