



# Illinois Department of Insurance

**BRUCE RAUNER**  
Governor

**JENNIFER HAMMER**  
Director

TO: ALL COMPANIES WRITING HEALTH AND ACCIDENT INSURANCE IN ILLINOIS

FROM: JENNIFER HAMMER, DIRECTOR OF INSURANCE *JH*

DATE: MAY 1, 2018

RE: COMPANY BULLETIN #2018-03. ILLINOIS FILING REQUIREMENTS FOR INDIVIDUAL AND SMALL GROUP HEALTH PLANS (ON AND OFF-MARKETPLACE)

Instructions to Issuers seeking certification, recertification, or approval of individual and small group health plans and Stand Alone Dental Plans (SADP) on and off the Individual and Small Business Health Options Program (SHOP) Marketplace for 2019.

The Issuer deadlines apply to all individual and small group health plans & dental plans on and off Marketplace		
Activity	Dates	
Plan and Rate Application Submission and Review Process	<b>Deadline for Issuers to Submit Plan Data and Rate Filings to Illinois DOI through SERFF</b>	6/1/2018
	Illinois DOI First SERFF Data Transfer Deadline	6/20/18
	CMS Reviews Initial QHP Applications	6/21/18-8/3/18
	Illinois DOI Second SERFF Transfer Deadline	7/25/18
	<b>Deadline for Issuers to Submit Changes to Rates</b>	8/1/18
	<b>Deadline for Issuers to Submit Service Area Petition Changes</b>	8/6/18
	CMS Sends First Correction Notice to Issuers	8/10/18
	Illinois DOI Deadline to Provide Issuer Service Area Petition Changes to CMS	8/13/18
	<b>Deadline for Issuers to Submit Changes to Plan Submissions</b>	8/15/18
	Illinois DOI Second SERFF Data Transfer Deadline for States	8/22/18
	CMS Reviews Final QHP Submissions	8/23/18-9/10/18
	CMS Sends Final Correction Notice to Issuers with Agreements for Signature and Plan Lists for Confirmation	9/17/18
Illinois DOI sends CMS final Plan Recommendations	9/25/18	
QHP Agreement/ Final Certification	Issuers Send Signed Agreements, Confirmed Plan Lists and Final Plan Crosswalks to CMS	9/17/18-9/25/18
	Limited Data Correction Window (Outreach to Issuers with CMS or Illinois DOI Identified Data Errors; Issuers Submit Corrections; CMS Reviews and Finalizes Data for Open Enrollment.)	9/20/18-9/21/18
	CMS sends Certification Notices with counter-signed agreements and final plan lists to Issuers	10/4/18-10/5/18
<b>Open Enrollment begins</b>		<b>11/1/18</b>

Issuers are advised to consult federal regulations, the 2019 Letter to Issuers, and state law in conjunction with this Bulletin to ensure full compliance. Helpful documents can be found on the Illinois Department of Insurance's [ACA Issuer Homepage](#).

- New for 2019 – All Issuers must register for the CCIIO Plan Management Community to receive correction and certification notices, as well as other relevant communication regarding their QHP application.
- Service Area Exception: Issuers that fail to offer coverage to an entire rating area must obtain an exception from the Department. (See 2019 [QHP Service Area Exception Form](#)) The Issuer must provide service area maps to show compliance with the service area requirement.
- For Plans that will be discontinued or modified, Issuers must submit the appropriate letters or notifications pursuant 215 ILCS 97/60. Issuers should use the [notification template](#) for the Individual market.

All form filings must be submitted in the format of a complete insurance policy; the Department will not accept matrix insert page filings, riders, amendments, variable language or brackets. Note: Summary of Benefits and Coverage may contain bracketed information per the federal template, and the cover page may include brackets for policyholder name, policy number, product name, effective date of policy and other identifying data.

Issuers should:

- Visit the [CMS QHP Certification website](#) and complete the QHP application using the relevant templates and review tools.
  - For 2019 plans, Illinois will require the crosswalk template to be uploaded to the binders.
- Submit all **checklists, templates, and supporting documentation** in SERFF.
- Provide a red-lined version identifying the variations in plan benefit design from the plans submitted for the previous plan year for each form filing submitted for recertification. Both the red-lined version and final form or policy must be submitted in the form filing in SERFF.
- Verify use of the Data Integrity Tool and make necessary corrections to applications.
- Submit rate and form filings separately, but associate rate and form filings with the relevant Plan application.
- Remit the fee of \$3,000.00 for certification of each new QHP. Remit the fee of \$1,500.00 for recertification of an existing QHP.

**Table 2: Maximum Annual Limitation on Cost Sharing for Plan Year 2019**

	Individual Coverage	Family Coverage
Health Plans:	\$7,900	\$15,800
	Individual Coverage	Family Coverage
SADPs that provide pediatric dental EHB:	\$350	\$700

Issuers may be required to attach other checklists as indicated by the ACA individual, Small Group, and Catastrophic Checklist and/or supporting document templates.

**Exhibit 1:**

**2019 Health Plans Filing Requirements - Forms & Binder**

Federal Required Templates	Required Submission via SERFF		Location:
	On/Off-Marketplace	Off-Marketplace	
All applicable templates/documents listed on the <u>QHP Certification Checklist</u> shall be uploaded in SERFF binder <i>(Note that documentation must be submitted in SERFF binder for the state of Illinois)</i>	Yes	(refer to Exhibit 2 for specific templates)	Binder
<b>Illinois Required Documents</b>			
<u>ACA Individual, Small Group, and Catastrophic Checklist</u>	Yes	Yes	Form Filing
<u>ACA Individual &amp; Small Group SADP Review Requirements Checklist</u>	Yes	Yes	Form Filing
<u>Network Adequacy and Transparency Checklist</u>	Yes	Yes	Network Adequacy Filing
<u>Mental Health Parity Supporting Documentation Template</u>	Yes	Yes	Form Filing
<u>Proposed Enrollment Template</u>	Yes	No	Binder
<u>External Review Checklist</u>	Yes	Yes	Binder

**Exhibit 2:**

**2019 Health Plans Filing Requirements - Rates**

Federal Required Templates	Required Submission via SERFF		Location:
	On/Off-Marketplace	Off-Marketplace	
QHP Rating Module documents - Rates Table Template - Business Rules Template	Yes	Yes	Rate Filing & Binder
Unified Rate Review Template	Yes	Yes	Rate Filing & Binder
<b>Illinois Required Documents</b>			
<u>Health Premium Rates Checklist</u>	Yes	Yes	Rate Filing & Binder
<u>Proposed Enrollment Template</u>	Yes	No	Rate Filing & Binder