2015 QUALIFIED HEALTH PLAN APPLICATION REVIEW TOOLS USER GUIDE: COST SHARING TOOL

Loading and Analyzing the Data

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COST SHARING TOOL OVERVIEW

Tool	Function
Cost Sharing Tool	• Conducts four cost-sharing standards analyses (when applicable to the specific plan): – Maximum out-of-pocket (MOOP) review. – Cost sharing reduction (CSR) review. – Catastrophic plan review.

The Cost Sharing Tool offers one methodology for reviewing cost sharing requirements under Federal rulemaking. This tool runs three different checks (when applicable to the plan) for cost sharing standards. This includes: maximum out-of-pocket (MOOP) review, cost sharing reduction (CSR) plan variation review, and catastrophic plan review.

The Cost Sharing Tool can be run for the following plan types: only plans that are offered on the Marketplace, only plans that are offered off the Marketplace, or for all submitted standard plans, both on and off the Marketplace.

The first step in running the Cost Sharing Tool is to import data into the Master Review Tool. The Cost Sharing Tool will then import its data from data in the Master Review Tool. Please refer to the Master Review Tool User Guide for help with importing data into the Master Review Tool. For the tools to run, it is imperative users do not change the worksheet names, format, and overall structure (e.g., adding or deleting rows or columns, changing field names, copying or deleting worksheets), as this could impact the functioning of the tool macros.

Using this Guide

The following characteristics are intended to focus the user to where actions are warranted:

- Items that appear in *italics* are features. (e.g., See the *Instructions* tab in the Master Review Tool)
- Items that are in **bold** type are functions. (e.g., **Click "Save." Click "Import Data from Master Review Tool."**)
- For space considerations, screenshots of Excel worksheets may not include the full data picture.
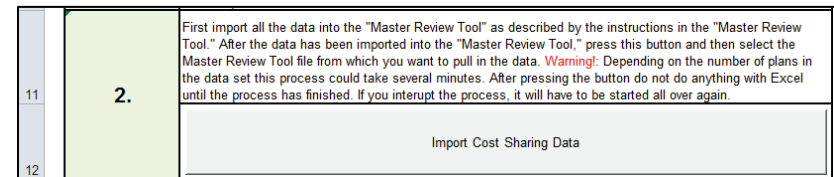
COST SHARING REVIEW TOOL: LOADING THE DATA
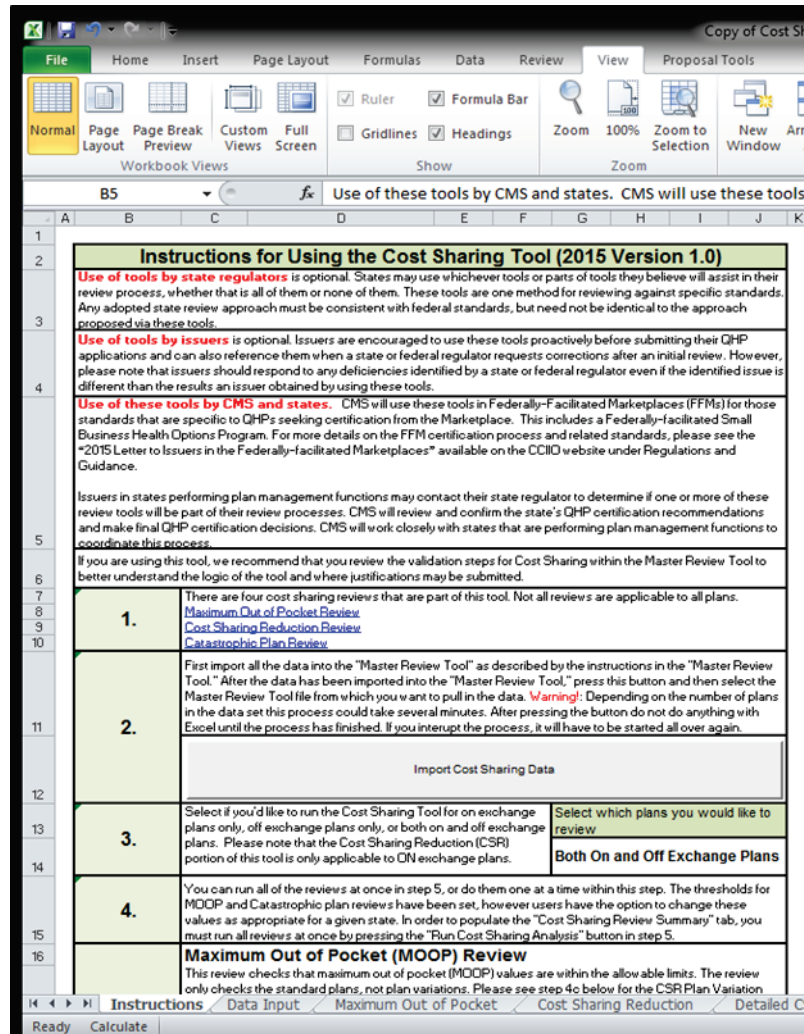
Before you can begin the Cost Sharing Tool steps, **download** the tool from SERVIS (https://servis.cms.gov/resources/document_detail?doc_detail_id=c2de042d-

bf0e-4e2a-46da-53691d3dc025) (states) or CMSzONE (https://zone.cms.gov/document/2015-qhp-application-review-tools) (issuers) and complete the **Import All Plan Data** function in the Master Review Tool *Instructions* tab.

If you are using this stand-alone tool, we recommend that you review the validation steps in the Master Review Tool *Benefit Cost Sharing* tab to understand the logic of the tool and where justifications may overcome the tool's automated results.

1. In the Cost Sharing Tool *Instructions* tab, row 12, **click "Import Cost Sharing Data."**

2. At the pop-up window, **select** the Master Review Tool that has all the imported data.
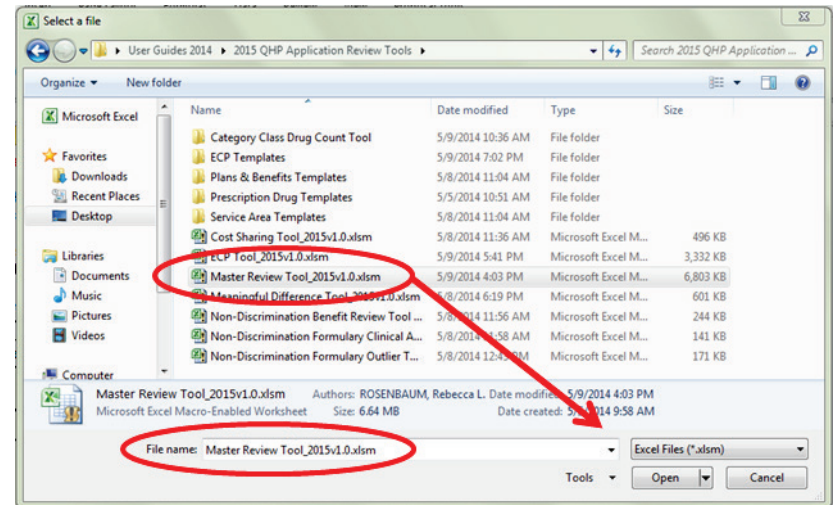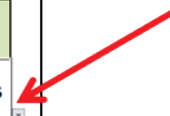
3. After **clicking "Open"** in the pop-up window, data will load and "All cost-sharing data imported successfully" will appear and the *Data Input* tab opens, fully populated. **Select**, using the drop down in row 14, if you want to run the Cost Sharing Tool for plans offered on the Marketplace only, plans offered off the Marketplace only, or both plans offered on and off the Marketplace. The CSR portion of this tool only applies to plans offered on the Marketplace.

4. User Option: you can run all the reviews at once in step 5, or run them one at a time within step 4.

5. User Option: the thresholds for MOOP and catastrophic plan reviews have been set; however, users have the option (see step 4) to change these values as appropriate for a given state.

a. MOOP

19		Health Plan Individual (Self-Only)	$	6,600
20	4a.	Health Plan Family (Other than Self-Only)	$	13,200
21		Stand-Alone Dental Plan Individual	$	350
22		Stand-Alone Dental Plan Family	$	700

b. Catastrophic

34	4c.	Health Plan Individual (Self-Only)	$	6,600
35		Health Plan Family (Other than Self-Only)	$	13,200

NOTE: To populate the Cost Sharing *Review Summary* tab, you must run all reviews at once by pressing the "**Run Cost Sharing Analysis**" button in step 5, row 42.

6. Running the Reviews One at a Time:

   a. MOOP Review

In the Cost Sharing Tool *Instructions* tab, **confirm** the defaults or **update** the proper qualified health plan (QHP) and stand-alone dental plan (if applicable) limits in rows 19-22. The MOOP fields have been populated with the annual dollar limitation specified in the *U.S. Department of Health and Human Services (HHS) Notice of Benefit and Payment Parameters for 2015.* (https://www.federalregister.gov/articles/2014/03/11/2014-05052/patient-protection-and-affordable-care-act-hhs-notice-of-benefit-and-payment-parameters-for-2015)

   1. **Click "Run MOOP Analysis"** in row 25; to clear the data after the analysis, **click** "**Clear Data,"** also in row 25.

16	**Maximum Out of Pocket (MOOP) Review**		
17	This review checks that maximum out of pocket (MOOP) values are within the allowable limits. The review only checks the standard plans, not plan variations. Please see step 4c below for the CSR Plan Variation review for the check that plan variations have MOOP values within the allowable limits.		
18	1. Before running the Maximum Out of Pocket Review, states may confirm or update the Health Plan and Stand-Alone Dental Plan Limits. The maximum out of pocket fields have been populated with the annual dollar limitation specified in the HHS Notice of Benefit and Payment Parameters for 2015. Please see this document for more details on the annual limits on cost sharing.		
19	Health Plan Individual (Self-Only)	$	6,600
20	Health Plan Family (Other than Self-Only)	$	13,200
21	Stand-Alone Dental Plan Individual	$	350
22	Stand-Alone Dental Plan Family	$	700
23	2. To run the Maximum Out of Pocket Review, press the "Run MOOP Analysis" button below. The results will appear in the "Maximum Out of Pocket" with the deficient fields bolded and underlined. **New feature for 2015:** The "Description of Issue" column to the far right will give more details on what is causing the issue.		
24	3.To clear all of the results from the "Maximum Out of Pocket" tab, press the "Clear Data" button below.		
25	Run MOOP Analysis		Clear Data

2. The MOOP analysis is successful when the *MOOP* tab is fully populated.

Cost Sharing Tool_2015v1.0(1).xlsm (Read-Only)

	HIOS Plan ID* (Standard Component + Variant)	Compliant?	Family MOOP Values Missing	Dental Only Plan	Medical & Drug Maximum Out of Pocket Integrated?	Multiple In Network Tiers?	Maximum Out of Pocket for Medical EHB Benefits						Maximum Out of Pocket for Drug EHB Benefits					
							In Network		In Network (Tier 2)		Combined In/Out		In Network		In Network (Tier 2)		Combined In/Out	
							Individual	Family	Individual	Family	Individual	Family	Individual	Family	Individual	Family	Individual	Family
4	12345ZZ0010001-00	*Not Met*		Yes		No	700	1400			Not Applica	Not Applicable						
5	12345ZZ0010001-01	*Not Met*		Yes		No	700	1400			Not Applica	Not Applicable						
6	12345ZZ0010002-00	*Not Met*		Yes		No	700	1400			Not Applica	Not Applicable						
7	12345ZZ0010002-01	*Not Met*		Yes		No	700	1400			Not Applica	Not Applicable						
8	12345ZZ0030001-00	*Not Met*		Yes		No	700	1400			Not Applica	Not Applicable						
9	12345ZZ0030001-01	*Not Met*		Yes		No	700	1400			Not Applica	Not Applicable						
10	12345ZZ0030002-00	*Not Met*		Yes		No	700	1400			Not Applica	Not Applicable						
11	12345ZZ0030002-01	*Not Met*		Yes		No	700	1400			Not Applica	Not Applicable						
12	67899ZZ0350001-01	Met	No	Yes	No													
13	67899ZZ0350002-01	Met	No	Yes	No													
14	67899ZZ0350003-01	Met	No	Yes	No													
15	67899ZZ0350004-01	Met	No	Yes	No													
16	67899ZZ0290001-00	Met	No	Yes	No													
17	67899ZZ0290001-01	Met	No	Yes	No													
18	67899ZZ0290002-00	Met	No	Yes	No													
19	67899ZZ0290002-01	Met	No	Yes	No													
20	67899ZZ0290003-00	Met	No	Yes	No													
21	67899ZZ0290003-01	Met	No	Yes	No													
22	67899ZZ0290004-00	Met	No	Yes	No													
23	67899ZZ0290004-01	Met	No	Yes	No													
24	67899ZZ0320001-00	Met	No	Yes	No													
25	67899ZZ0320001-01	Met	No	Yes	No													
26	67899ZZ0320002-00	Met	No	Yes	No													
27	67899ZZ0320002-01	Met	No	Yes	No													
28	67899ZZ0320003-00	Met	No	Yes	No													
29	67899ZZ0320003-01	Met	No	Yes	No													
30	67899ZZ0320004-00	Met	No	Yes	No													
31	67899ZZ0320004-01	Met	No	Yes	No													
32	67899ZZ0350005-01	Met	No	Yes	No													
33	67899ZZ0350006-01	Met	No	Yes	No													

Maximum Out of Pocket | Cost Sharing Reduction | Detailed CSR Results | Catastrophic | Detailed Catastrophic Results

Ready   Sum=0

3. The "Description of Issue" column to the far right will give more details on what is causing the issue.

b. CSR Review

1. In the Cost Sharing Tool *Instructions* tab, **click** "**Run CSR Analysis;**" to clear the data after the analysis, **click** "**Clear Data**."
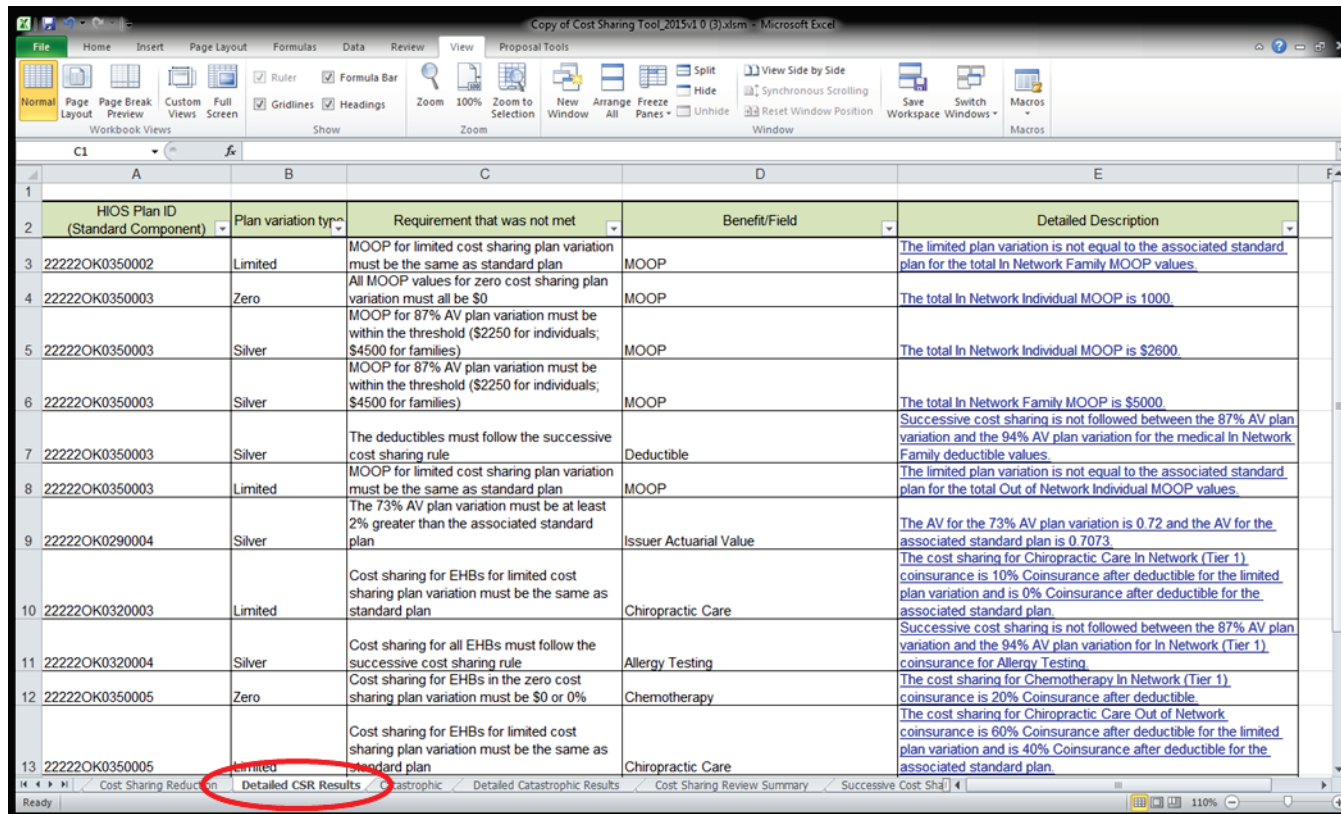
26		**Cost Sharing Reduction (CSR) Plan Variation Review**
27		This review checks that each plan has the required plan variations and that the variations meet specific regulatory requirements. It is only applicable to Individual market plans that do not have a coverage level of
	4b.	1. To run the *Cost Sharing Reduction Review*, press the "Run CSR Analysis" button below. The "Cost Sharing Reduction" tab contains a list of all of the requirements that make up the CSR review across the top, and will indicate if a plan has met each of those requirements. **Note:** Many of the reviews check successive cost sharing, see the "Successive Cost Sharing" tab for details and examples of this review. **New feature for 2015:** For all checks that are not met, the "Detailed CSR Results" tab will contain a more detailed description of the issue, as well as a link back to the "Data Input" tab to show exactly where the issue is.
28		
29		2. To clear all of the data from the "Cost Sharing Reduction" tab and the "Detailed CSR Results" tab, press the "Clear Data" button below.
30		Run CSR Analysis	Clear Data

2. The CSR analysis is successful when the *Cost Sharing Reduction* tab is fully populated.

3. For all checks that are not met, the *Detailed CSR Results* tab will contain a more detailed description of the issue, as well as a link back to the *Data Input* tab to show exactly where the issue is.

c. Catastrophic Plan Review

1. In the Cost Sharing Tool *Instructions* tab, **confirm** the proper deductible and MOOP limits in rows 42 and 43. The *HHS Notice for Benefit and Payment Parameters for 2015* provides more guidance.

2. Click "Run Catastrophic Analysis" to clear the data after the analysis, click "Clear Data."

3. The catastrophic plan analysis is successful when the *Catastrophic* tab is fully populated; if you receive an errors occurred message, see the respective error log tab.

4. For all checks that are not met, the *Detailed Catastrophic Results* tab will contain a more detailed description of the issue, and a link to the *Data Input* tab to pinpoint the issue.

7. Running the Reviews Together

Confirm or **update** the default values in all review analyses. (Rows 19-22 for the MOOP review; and rows 34 and 35 for the catastrophic plan review.)

a. MOOP

19		Health Plan Individual (Self-Only)	$	6,600
20	**4a.**	Health Plan Family (Other than Self-Only)	$	13,200
21		Stand-Alone Dental Plan Individual	$	350
22		Stand-Alone Dental Plan Family	$	700

b. Catastrophic

34	**4c.**	Health Plan Individual (Self-Only)	$	6,600
35		Health Plan Family (Other than Self-Only)	$	13,200

1. In the Cost Sharing Tool *Instructions* tab, **click "Run Cost Sharing Analysis."** To clear the data from the *Summary Plan Level* tab after the analysis, **click "Clear Summary Data;"** to clear data from the individual review tabs, **click "Clear Data from Section Analysis."**

38		**Run All Reviews Together**
39		1. Running all of the reviews at once will populate their individual review tabs as well as the "Cost Sharing Review Summary" tab, where you can see if each review was met, not met, or not applicable for each plan.
40		2. Before running all reviews, please confirm or update all required fields in the four review sections above and make sure the "Data Input" tab has been completed.
41	**5.**	3. To run all of the reviews and generate the summary sheet, press the "Run Cost Sharing Analysis" button below. To clear all of the data from the Summary table, press the "Clear Data" button below. To clear the data from the individual review tabs, press the "Clear Data From Section Analysis" button below.
42		Run Cost Sharing Analysis Clear Summary Data Clear Data From Section Analysis

2. The cost-sharing analysis is successful when the *Cost Sharing Reduction* tab is fully populated; if there are errors in any of the reviews, *errors occurred* messages will appear specific to the corresponding review.

8. **Save** the Cost Sharing Tool before closing.

COST SHARING REVIEW TOOL: ANALYSIS

1. **Open** the QHP application review tools folder and run the Cost Sharing Tool for all the plans you wish to evaluate. See instructions above: *Cost Sharing Tool: Loading the data*

2. **Review** the validation steps in the Master Review Tool *Benefit Cost Sharing* tab to better understand the logic behind the Cost Sharing Tool or to see where you can submit justifications.

3. **Open** the Master Review Tool and open the *Benefit Cost Sharing* tab to see the issuer's plans you wish to review. Using the analysis run and presented in the tabs of the Cost Sharing Tool, **determine** if the plans analyzed meet the regulatory standards.

4. Using the data in the Cost Sharing Tool *Summary Plan Level* tab, **go to** the Master Review Tool *Benefit Cost Sharing* tab and **populate** "**Met**" or "**Not Met**" from the drop-down menus at the top of each column in the SELECT REVIEW RESULT row for each issuer.

5. **Open** the Master Review Tool *Review Summary* tab to see the auto-populated results in row 18.

6. **Save** the Master Review Tool after you have completed the benefit cost sharing review.

APPENDIX: ACRONYMS AND TERMS

Acronym	Definition
AAAHC	Accreditation Association for Ambulatory Health Care
AV	actuarial value
AVC	actuarial value calculator
APTC	advance premium tax credits
ACA	Affordable Care Act
API	application programming interface
BCBS	Blue Cross Blue Shield
BPCK	branded pack
CCIIO	Center for Consumer Information and Insurance Oversight
CMS	Centers for Medicare & Medicaid Services
COA	certificate of authority
CALT	Collaborative Application Lifecycle Tool
CAHPS	Consumer Assessment of Healthcare Providers and Systems
CSR	cost-sharing reduction
DOB	date of birth
DIT	data integrity tool
DMARDs	disease-modifying antirheumatic drugs

Acronym	Definition
DOI	Department of Insurance
DPP	diabetes prevention program
DSH	disproportionate share hospital
EIDM	electronic imaging and document management
EIN	employer identification number
ECP	essential community provider
EHB	essential health benefit
EPO	exclusive provider organization
FEIN	Federal employer identification number
FPL	Federal poverty level
FQHC	Federally qualified health center
FFM	Federally-facilitated Marketplace
GSA	General Services Administration
GPCK	generic pack
HHS	U.S. Department of Health and Human Services
HIOS	Health Insurance Oversight System
HIPAA	Health Insurance Portability and Accountability Act
HMO	health maintenance organization

Acronym	Definition
HPSA	health professional shortage area
HRA	health reimbursement arrangement
HSA	health savings account
ISS	interactive survey system
MCO	managed care organization
MOOP	maximum out-of-pocket
M	multiplier
NAIC	National Association of Insurance Commissioners
NCQA	National Committee for Quality Assurance
NPI	national provider identifier
OIG	Office of the Inspector General
OOPM	out-of-pocket maximum
POS	point of service
PPO	preferred provider organization
PA	prior authorization
QHP	qualified health plan
RXCUI	RxNorm Concept Unique Identifier
SBC	summary of benefits and coverage
SBD	semantic branded drug

Acronym	Definition
SCD	semantic clinical drug
SHOP	Small Business Health Options Program
SEP	special enrollment period
SBM	State-based Marketplace
SPM	State Partnership Marketplace
SSN	Social Security number
SGLT2	sodium glucose co-transporter 2 inhibitors
ST	step therapy
TIN	taxpayer identification number
TNF	tumor necrosis factors
TTY	term types
UMLS	Unified Medical Language System
UCAA	Uniform Certificate of Authority Application
USP	United States Pharmacopeia
.xlms	Excel macro-enabled workbook