Plan Certification Subgroup

- Examine federal Exchange requirements for issuers and qualified health plans (QHPs)
- Understand how current state laws and rules relate to federal requirements
- Develop recommendations for 2014 requirements as well as considerations or recommendations for future years
Subgroup Membership

- Beth Monsrud, UCare
- Jennifer McGill, Cargill
- Tina Armstrong, Minnesota Department of Commerce
- Philip Cryan, SEIU
- Rick Lassow, Blue Cross Blue Shield
- Representative Tina Liebling
- Carmelo Cinqueonce, Minnesota Dental Association

- Bryan Cole, HealthPartners
- Irene Goldman, Minnesota Department of Health
- Dr. Marilyn Peitso, CentraCare
- Matt Anderson, Minnesota Hospital Association
- Phil Norrgard, Director of Human Services, Fond du Lac Indian Tribe
- Joe Lally, Delta Dental
Development and Public Review

- Subgroup met 7 times between May and August 2012
- Reviewed and finalized recommendations in late August
- Recommendations were posted for public comment on September 4, 2012 for almost two weeks
- Adverse Selection Work Group reviewed at its September 19 meeting
Issuer Certification Criteria

- Benefit Design
- Licensure
- Quality Improvement
- Risk Adjustment

- Non Discrimination
- Rating Variation
- Marketing
- Accreditation
QHP Certification Criteria

- Network Adequacy
- Essential Community Providers
- Enrollment and Termination Requirements
- Rating Information
- Service Area (Minimum Geographical Area)
Recommendations

- Minnesota has state laws and rules that relate to almost all areas of federal QHP and issuer certification requirements

- Exchange should use existing provisions of state law and rule as basis of certification criteria for 2014

- Topics that required more discussion
  - Network Adequacy
  - Service Area
  - Accreditation
  - Quality Improvement and Reporting
Recommendation: Network Adequacy

- Generally apply current state network adequacy requirements for HMOs to other product types
- Requirements that are only relevant to HMOs (e.g. referrals) would not be applied to other product types
Recommendation: Service Area

- Services areas should generally be no smaller than a county.
- Carriers proposing to serve a sub-county region must demonstrate the sub-county area is necessary, non-discriminatory, and in the best interest of beneficiaries.
Recommendation: Accreditation

- Carriers must obtain the appropriate level of accreditation in third year after the issuer offers a QHP on the Exchange.

- Carriers must take the first step of obtaining accreditation in the first year in which it offers a QHP.
Recommendation: Quality Improvement

- Exchange Measurement and Reporting Work Group should first develop a recommended health plan quality rating methodology.
- Plan Certification Subgroup should revisit discussion of potential quality standards after above methodology is established and consider concept of quality standards within that framework.
Additional Topics of Interest
Recommendation on Recertification

- Exchange should have an annual or less frequent process that relies on attestation.
- Regulators will continue their monitoring and oversight of specific areas of certification and can examine any areas of concern.
- Exchange should provide opportunities for stakeholders to express concerns related to compliance with certification criteria.
Recommendation on Streamlining

- Robust decision support tools are needed
- “Meaningful difference” standard for implementation in 2014
- Conduct a study to identify advantages and disadvantages of benefit streamlining and of different approaches to benefit streamlining
Recommendation on Indian Addendum

- Carriers should use Indian Addendum in contracts with Indian Health Care Providers to summarize and clarify existing provisions of law related to these providers.
Suggestions for Future Consideration

- Subgroup members suggested various topics for future consideration

- These suggestions are not formal recommendations of the Subgroup

- Plan Certification Subgroup would reconvene at future point to consider these suggestions