

CROSSWALK OF REVISIONS BASED ON 60-DAY COMMENTS FOR BLUEPRINT FOR APPROVAL OF AFFORDABLE HEALTH INSURANCE MARKETPLACES
(FORMERLY REFERRED TO AS CERTIFICATION APPLICATION)

Original Section of Marketplace Blueprint – pre 60-day Comments	Revised Section of Marketplace Blueprint – post 60-day Comments	Change	Rationale
State-Based Marketplace Application			
1.0 Legal Authority and Governance	1.0 Legal Authority and Governance	<ul style="list-style-type: none"> • Changed application format. • Removed U.S. Department of Health and Human Services (HHS) benchmark dates. • Removed frequency with which Marketplace needs to hold board meetings. 	<p>The Center for Consumer Information and Insurance Oversight (CCIIO) has changed the format for completing and attesting to Blueprint activities to alleviate applicant confusion and simplify the application process. The new format will also allow the Centers for Medicare & Medicaid Services (CMS) to more efficiently determine whether or not a state has attested to a particular activity and evaluate a state’s position in terms of gaining approval.</p> <p>CCIIO has removed specific dates and timeframes by which Marketplaces must complete an activity to provide flexibility to state project plans due to changing Blueprint deadlines and varying levels of progress toward Marketplace build a state is able to leverage. Removal of HHS benchmark dates will make</p>

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			the Blueprint Application applicable for any state wishing to apply in subsequent years.
2.0 Consumer and Stakeholder Engagement and Support	2.0 Consumer and Stakeholder Engagement and Support	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Included regulatory citations for tribal consultation, outreach and education, and call center activities. • Included language for outreach and education, call center, and website activities to more closely align to statutory language. • Removed activity around digital media materials. • Removed activity around risk mitigation for Navigators and non-Navigator assistance personnel. 	<p>See above.</p> <p>Included new language and regulatory citations where applicable to ensure the Blueprint Application most accurately reflects current rulemaking and to justify Blueprint activities by statute.</p> <p>Removed specific activities to allow for the most flexibility to states in designing Marketplace programs that best suit their population.</p>
3.0 Eligibility and Enrollment	3.0 Eligibility and Enrollment	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Separated activities for individual, Small Business Health Options Program (SHOP) employer, and SHOP employee applications. • Revised language for Appeals section to reflect updated regulations. 	<p>See above.</p> <p>Revisions reflect current regulatory guidance.</p>
4.0 Plan Management	4.0 Plan Management	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Added language to clarify the Plan Preview process. • Added language to more explicitly define plan management system requirements. 	<p>See above.</p> <p>Added explanatory language around certain activities to alleviate any applicant confusion when completing the Blueprint Application.</p>

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5.0 Risk Adjustment	5.0 Risk Adjustment	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Removed the 30-day post Federal Payment Notice requirement to have published the notice of benefit and payment parameters and included regulatory citation for activity. 	See above.
6.0 SHOP	6.0 SHOP	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Removed specific frequency with which states should require qualified health plan (QHP) issuers to make rate changes in the SHOP. • Removed “If applicable” from activity around uniform timing for QHP issuer rate changes in the SHOP. • Added appropriate regulatory citations. • Included requirement for method to determine how the state will determine whether an employee is a full-time employee. • Clarified the notices that must be demonstrated for the SHOP. 	<p>See above.</p> <p>Ensured activities most accurately reflect and assess readiness for specific Marketplace functioning based on most current policy.</p>
7.0 Organization and Human Resources	7.0 Organization and Human Resources	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Included more robust language for activity description. • Requested information through 2016 as opposed to 2015. 	<p>See above.</p> <p>Requested long-term information to adequately prepare for long-term sustainability for the Marketplace.</p>
8.0 Finance and Accounting	8.0 Finance and Accounting	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Requests long-term budget information for the upcoming five years as opposed to 2015. • Requests budget documentations describing sources of revenue, enrollment projections, etc. 	<p>See above.</p> <p>Necessary to gain a better assessment of a state’s sustainability.</p>

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9.0 Technology	9.0 Technology	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Request CALT ID numbers for enterprise lifecycle (ELC) artifacts as opposed to actual document. • Removed specific ELC artifacts from application. • Removed 70 percent build demonstration. 	<p>See above.</p> <p>Requesting the ID numbers for CALT documentation as evidence to reduce the burden placed on states as they complete their Blueprint and avoid duplication.</p>
10.0 Privacy and Security	10.0 Privacy and Security	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Request CALT ID numbers for privacy and security artifacts as opposed to actual document to reflect current protocol. 	<p>See above.</p> <p>Change reflects current protocol for submitting privacy and security artifacts to CMS for review.</p>
11.0 Oversight and Monitoring	11.0 Oversight and Monitoring	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Included requirement to maintain documentation demonstrating compliance with Federal standards for oversight and monitoring activities. 	<p>See above.</p>
12.0 Contingency Planning	12.0 Contingency Planning	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. 	
13.0 Re-use	13.0 Re-use	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. 	
	14.0 Coordination between the State-based Marketplace and the Federally-facilitated Marketplace	<ul style="list-style-type: none"> • Added activity related to coordination between the State-based Marketplace and the Federally-facilitated Marketplace. 	<p>Additional activity was needed to ensure appropriate transfer of data between the State-based Marketplace and the Federally-facilitated Marketplace.</p>
State Partnership Marketplace Application			
1.0 Legal Authority and Governance	1.0 Legal Authority and Governance	<ul style="list-style-type: none"> • Removed section. 	<p>As Plan Management activities will no longer be available for the State Partnership model, no</p>

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			activities under Legal Authority and Governance apply for Partnership states.
2.0 Consumer and Stakeholder Engagement and Support	2.0 Consumer and Stakeholder Engagement and Support	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Included regulatory citations when appropriate. • Included language for outreach and education activities to more closely align to statutory language. • Included more descriptive language for development of outreach materials. 	See above.
4.0 Plan Management	4.0 Plan Management	<ul style="list-style-type: none"> • Removed section. 	
9.0 Technology	9.0 Technology	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Tailored technology requirements to Partnership Marketplace model. 	See above. Requirements were tailored to reflect more refined guidance around model.
10.0 Privacy and Security	10.0 Privacy and Security	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Request CALT ID numbers for ELC artifacts as opposed to actual document. 	See above. Change reflects current protocol for submitting privacy and security artifacts to CMS for review.
11.0 Oversight and Monitoring	11.0 Oversight and Monitoring	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Included the requirement for the capacity to maintain books, records, documents, and other evidence of procedures and practices to demonstrate compliance for each benefit year for at least 10 years. 	See above.
12.0 Contingency Planning	12.0 Contingency Planning	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. 	See above.
13.0 Re-Use	13.0 Re-Use	<ul style="list-style-type: none"> • Changed the application format. 	See above.

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		<ul style="list-style-type: none"> Removed HHS benchmark dates. 	
State-Based Small Business Health Options Program (SHOP) Marketplace Blueprint Application			
1.0 Legal Authority and Governance	1.0 Legal Authority and Governance	<ul style="list-style-type: none"> Changed the application format. Removed HHS benchmark dates. Included regulatory citations. Listed all governing board structure requirements. 	See above.
2.0 Consumer and Stakeholder Engagement and Support	2.0 Consumer and Stakeholder Engagement and Support	<ul style="list-style-type: none"> Changed the application format. Removed HHS benchmark dates. Included regulatory citations when necessary. Included language for outreach and education, call center, and website activities to more closely align to statutory language. Included certified application counselor (CAC) activities. 	See above. Activities were included as additional guidance was released around the CAC program.
3.0 Eligibility and Enrollment	3.0 Eligibility and Enrollment	<ul style="list-style-type: none"> Changed the application format. Removed HHS benchmark dates. Separated activities for SHOP employer and SHOP employee applications. Revised appeals activities 	Changes were made to the E&E section to ensure application mirrored SBM application to the extent feasible.
4.0 Plan Management	4.0 Plan Management	<ul style="list-style-type: none"> Changed the application format. Removed HHS benchmark dates. 	See above.
5.0 Risk Adjustment	5.0 Risk Adjustment	<ul style="list-style-type: none"> Changed the application format. Removed HHS benchmark dates. Removed the 30-day post Federal Payment Notice requirement to have published the notice of benefit and payment parameters and included regulatory citation for activity. 	See above.
6.0 SHOP	6.0 SHOP	<ul style="list-style-type: none"> Changed the application format. 	See above.

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		<ul style="list-style-type: none"> Removed HHS benchmark dates. Included requirement for method to determine how the state will determine whether an employee is a full-time employee. Included activity to develop policies to ensure SHOP compliance with regulation. Removed SHOP premium calculator activity and folded associated activities into SHOP Marketplace compliance activities. Included optional activity around minimum participation requirements in the SHOP. Included activity regarding demonstrating SHOP website's ability to make employer and employee eligibility determinations and QHP comparisons. 	Changes were made to the SHOP section of the State-based SHOP application to ensure the application mirrored the SBM application to the greatest extent possible.
7.0 Organization and Human Resources	7.0 Organization and Human Resources	<ul style="list-style-type: none"> Changed the application format. Removed HHS benchmark dates. 	See above.
8.0 Finance and Accounting	8.0 Finance and Accounting	<ul style="list-style-type: none"> Changed the application format. Removed HHS benchmark dates. Included request for tentative budget and operations plan for 2016. 	See above.
9.0 Technology	9.0 Technology	<ul style="list-style-type: none"> Changed the application format. Removed HHS benchmark dates. Request CALT ID numbers for ELC artifacts as opposed to actual document. Removed specific ELC artifacts from application. 	See above.
10.0 Privacy and Security	10.0 Privacy and Security	<ul style="list-style-type: none"> Changed the application format. Removed HHS benchmark dates. Modified Privacy and Security activities and artifacts to reflect SHOP-only Marketplace requirements. Request CALT ID numbers for privacy and security artifacts as opposed to actual document. 	See above. Change reflects current protocol for submitting privacy and

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			security artifacts to CMS for review.
11.0 Oversight and Monitoring	11.0 Oversight and Monitoring	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. • Included the requirement for the capacity to maintain books, records, documents, and other evidence of procedures and practices to demonstrate compliance for each benefit year for at least 10 years. 	See above.
12.0 Contingency Planning	12.0 Contingency Planning	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. 	See above.
13.0 Re-Use	13.0 Re-Use	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. 	See above.
14.0 Coordination Between the SHOP and the Federally-facilitated Marketplace (FFM)	14.0 Coordination Between the SHOP and the FFM	<ul style="list-style-type: none"> • Changed the application format. • Removed HHS benchmark dates. 	See above.