

Commenter  
Blue Cross Blue Shield Association

Date  
4-Nov

Comment Summary

Release the state-level adjustment percentages before financial reporting is due (Jan 31, 2015)

Provide insurers with information on the process for calculating the state-level risk corridors adjustments

Only require data that is necessary to perform the calculation

United Health Group

4-Nov

Data collection should be limited to transitional states only; and only to a count of transitional enrollment and total individual/small group enrollment, as prescribed in regulation in §154.530 (e)

The deadline for submission should be moved from January 23, 2015 to April 30, 2015. The commenter believes that it will be operationally burdensome for issuers to provide enrollment counts during the open enrollment period. The commenter also suggested that enrollment counts would need to be synchronized with the counts submitted for the reinsurance and risk adjustment programs, and the deadline should therefore align with the April 30, 2015 deadline for submission of EDGE server data. The suggested due date would also align with the deadline for submitting SHCE information to the NAIC.