

Modifications to the Updated Version of Transitional Adjustment Data Reporting Form

CMS removed the field for “HIOS company ID” from the top of the form in response to various inquiries from AHIP and BCBSA questioning how an issuer should fill out the HIOS company ID field. The HIOS Company ID is an internal CMS number that issuers are not aware of. Therefore, it should not appear as though the field requires user input. We have deleted that field in the revised version. This change does not affect the type of respondents that must fill out the form, and does not affect the substance of the form in any way.

CMS also added “ACA-compliant” in the columns that require input from non-grandfathered plans. This modification better reflects the authority of the collection and the purpose of the risk corridors program. The 2014 and 2015 Payment Notices specify that only data from ACA-compliant plans is used in the risk corridors calculation. We have already stated this in the instructions for the transitional data collection, but we wanted to add text to form column itself to be more specific. We are also responding to questions from BCBSA and AHIP, which asked for confirmation that the experience of ACA-compliant plans should not be included. This will not change the substance of what it already required in the instructions or the regulations; it will simply make the form easier to read.

CMS also changed the language in the attestation to allow more flexibility in the event that the CEO or CFO of the company cannot sign the attestation. Instead of requiring signature from the CEO and CFO, the new form was modified so that signature from the CFO or a direct designee of the CFO is acceptable. CMS made this modification at the request of issuers in order to reduce burden, and to better align with the attestation language that is proposed for the risk corridors program and the attestation approach that was used for the reinsurance program.