

CMS Center for Consumer Information & Insurance Oversight (CCIIO), Health Insurance Exchange Public Use Files (Exchange PUF) Data Dictionary for Transparency in QHP Coverage PUF

1. Overview of the Transparency in QHP Coverage PUF

The Centers for Medicare & Medicaid Services (CMS) Center for Consumer Information & Insurance Oversight (CCIIO) is releasing the Transparency in Qualified Health Plan (QHP) Coverage Public Use File (PUF) in order to increase access to QHP issuer data reported pursuant to section 1311(e)(3) of the Affordable Care Act. The Transparency in QHP Coverage PUF includes data on QHPs and Stand-alone Dental Plans (SADPs) offered in states with Federally-Facilitated Exchanges (FFEs), including issuers in the FFEs where states perform plan management functions, and State-based Exchanges on the Federal Platform (SBE-FPs).

The data dictionary describes the variables contained in the Transparency in QHP Coverage PUF. Each record relates to coverage at the issuer level. The Transparency in QHP Coverage PUF separates issuerand plan-level claims data into three different tabs by plan type: specifically, Individual QHPs, Individual SADPs and Small Business Health Options Program (SHOP) small group QHPs. The Transparency in QHP Coverage PUF is available for plan years 2017-2025. PUF data always reflect data from the plan year that was two years prior. Therefore, the plan year 2025 PUF contains data from plan year 2023. This is because complete plan year 2024 data does not exist when issuers submit the PUF data (for example, during summer 2024 for plan year 2025).

Variable Attributes

Z. Variable Attributes	
Variable Name:	State
Variable Definition:	Two-character state abbreviation indicating the state where the issuer offers coverage on the Exchange.
Data Type:	Text
Variable Label:	State
Allowable Values:	All 50 state abbreviations + 9 territory abbreviations
Data Source:	System-generated field
Field Name from Data Source:	State Code
Comments:	N/A



Variable Name:	Issuer Name					
Variable Definition:	Name of the company issuing the plan.					
Data Type:	Text					
Variable Label:	Issuer Name					
Allowable Values:	Free text					
Data Source:	Issuer					
Field Name from Data Source:	N/A					
Comments:	N/A					
Variable Name:	Issuer ID					
Variable Definition:	Five-digit numeric code that identifies the issuer					
	organization in the Health Insurance Oversight System					
	(HIOS).					
Data Type:	Text					
Variable Label:	Issuer ID					
Allowable Values:	Free text					
Data Source:	Issuer					
Field Name from Data Source:	N/A					
Comments:	N/A					
Variable Name ⁱ :	New or Returning Issuer Status					
Variable Definition:	Indication of whether issuer is new or returning to the					
	Exchange for PY2025.					
Data Type:	Text					
Variable Label:	Is_Issuer_New_to_Exchange? (Yes_or_No)					
Allowable Values:	Yes; No					
Data Source:	Issuer					
Field Name from Data Source:	Was this Issuer on the Exchange in 2023?					
Comments:	N/A					
Variable Name ⁱⁱ :	SADP Only					
Variable Definition:	Indication of whether issuer is a Stand Alone Dental Plan (SADP) issuer.					
Data Type:	Text					



Variable Definition:

The Center for Consumer Information & Insurance Oversight (CCIIO) Transparency in Qualified Health Plan (QHP) coverage Public Use File (PUF) Data Dictionary

SADP_Only? (Yes or No) Variable Label: Allowable Values: Yes; No Data Source: Issuer Field Name from Data Source: SADP Only? Comments: N/A Variable Name: 2025 Plan ID Variable Definition: Fourteen-digit PY2025 plan ID. Data Type: Text Variable Label: Plan ID Allowable Values: Free text Data Source: Issuer Field Name from Data Source: N/A Comments: N/A Variable Nameⁱ: Medical or Dental Plan Type Variable Definition: Indication of whether plan is medical or dental. Data Type: Text Variable Label: QHP/SADP Allowable Values: QHP; SADP System-generated field Data Source: Field Name from Data Source QHP/SADP Comments: N/A Variable Nameⁱ: Plan Type Variable Definition: Indication of plan type. Data Type: Text Variable Label: Plan_Type Allowable Values: EPO; HMO; Indemnity; PPO; POS System-generated field Data Source: Field Name from Data Source: Plan Type Comments: N/A Variable Nameⁱ: Plan Metal Level

Indication of plan metal level.



Variable Definition:

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Data Type: Text Variable Label: Metal Level Allowable Values: Platinum, Gold, Silver, Bronze, Catastrophic Data Source: System-generated field Field Name from Data Source: Metal Level Comments: N/A Variable Name: **URL Claims Payment Policies & other Information** Variable Definition: URL link to policies on issuer websites. Data Type: Text Variable Label: **URL Claims Payment Policies** Allowable Values: Free text Data Source: Issuer Field Name from Data Source: N/A Comments: Record relates to coverage at the issuer level. Variable Name: Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023 Variable Definition: Number of claims received by an issuer asking for a payment or reimbursement by or on behalf of an innetwork health care provider (such as a hospital, physician, or pharmacy) that is contracted to be part of the network for an issuer (such as an HMO or PPO). These data are reported for plan year 2023. Data Type: Text Variable Label: Issuer Claim Received In Network Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Issuer-level data at the State level, for all QHPs on Comments: Exchange. 2015-2021 Issuer-level claims received and denied are aggregated by network status. Variable Name: Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023

Number of issuer-level out-of-network claims received

> that asked for a payment or reimbursement by or on behalf of a health care provider (such as a hospital, physician, or pharmacy) that is not contracted to be part of a network (such as an HMO or PPO). These data are reported for plan year 2023.

Data Type: Text

Variable Label: Issuer_Claim_Received_Out_Of_Network

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Comments: Issuer-level data at the state level, for all QHPs on

Exchange. 2015-2021 Issuer-level claims received and

denied are aggregated by network status.

Variable Name: Number of Issuer Level In-Network Claims with DOS in

2023 That Were Also Denied in Calendar Year 2023

Variable Definition: Number of claims received by an issuer asking for a

payment or reimbursement by or on behalf of an in-network health care provider (such as a hospital or doctor) that is contracted to be part of the network for an issuer (such as an HMO or PPO) that the issuer subsequently denied. These data are

reported for plan year 2023.

Data Type: Text

Variable Label: Issuer_Claim_Denied_In_Network

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Numerical Issuer

N/A

Comments: Issuer-level data at the State level, for all QHPs on

Exchange. 2015-2021 Issuer-level claims received and

denied are aggregated by network status.

Variable Name: Number of Issuer Level Out-of-Network Claims with

DOS in 2023 That Were Also Denied in Calendar Year

2023

Variable Definition: Number of issuer-level out-of-network claims you

received that asked for a payment or reimbursement by

or on behalf of a health care provider (such as a

hospital, physician, or pharmacy) that is not contracted to be part of your network (such as an HMO or PPO)

that you subsequently denied. These data are reported

for plan year 2023.

Data Type: Text

Variable Label: Issuer_Claim_Denied_Out_Of_Network

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Comments: Issuer-level data at the state level, for all QHPs on

Exchange. 2015-2021 Issuer-level claims received and

denied are aggregated by network status.

Variable Nameⁱⁱⁱ: Number of Issuer Level In-Network Claims with DOS in

2023 That Were Also Resubmitted in Calendar Year

2023

Variable Definition: Number of issuer–level in-network claims

resubmissions received that asked for a payment or reimbursement by or on behalf of a health care provider (such as a hospital or doctor) that is contracted to be part of the network for an issuer (such as an HMO or PPO) that the issuer previously denied. These data are reported for plan year 2023.

Data Type: Tex

Variable Label: Issuer_Claim_Resubmitted_In_Network

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Comments: Issuer-level data at the state level, for all QHPs on

Exchange. Issuer-level resubmitted claims data required

starting in plan year 2024.

Variable Nameⁱⁱⁱ: Number of Issuer Level Out-of-Network Claims with

DOS in 2022 That Were Also Resubmitted in Calendar

Year 2023

Variable Definition: Number of issuer-level out-of-network claims

resubmissions received that asked for a payment or reimbursement by or on behalf of a health care provider (such as a hospital or doctor) that is not contracted to be part of the network for an issuer (such as an HMO or PPO) that the issuer previously denied.

These data are reported for plan year 2023.

Data Type:

Variable Label:

The Center for Consumer Information & Insurance Oversight (CCIIO) Transparency in Qualified Health Plan (QHP) coverage Public Use File (PUF) Data Dictionary

Data Type: Text Variable Label: Issuer Claim Resubmitted Out Of Network Numerical Allowable Values: Data Source: Issuer Field Name from Data Source: N/A Comments: Issuer-level data at the state level, for all QHPs on Exchange. Issuer-level resubmitted claims data required starting in plan year 2024. Variable Name: Number of Internal Appeals Filed Variable Definition: Number of requests by the insured for internal reviews of grievances involving adverse determinations. An internal review is a process by which the insured may have an adverse determination reviewed by the issuer with respect to a denial of an admission, availability of care, continued stay, or health care service for a covered person. This applies to each plan year; these data are reported for 2015-2023. Data Type: Text Variable Label: Issuer Internal Appeals Filled Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Issuer-level data at the state level, for all QHPs on Exchange. Variable Name: Number of Internal Appeals Overturned Variable Definition: Number of final adverse determinations overturned upon request for internal review. An internal review is a process by which the insured may have an adverse determination reviewed by the issuer with respect to a denial of an admission, availability of care, continued stay, or health care service for a covered person. All overturned internal appeals must be included, including those overturned in whole or in part. This applies to each plan year; these data are reported for 2015-2023.

Text

Issuer Number of Internal Appeals Overturned



Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Issuer-level data at the State level, for all QHPs on Exchange. Percent of Internal Appeals Overturned Variable Name: Variable Definition: Percentage of adverse benefit determinations Overturned (# internal appeals overturned/# of internal appeals filed) by plan/issuer in favor of the beneficiary. This applies to each plan year; the data are reported for 2015-2023. Data Type: Text Variable Label: Issuer_Percent_Internal_Appeals_Overturned Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Issuer-level data at the State level, for all QHPs on Exchange. Number of External Appeals Filed Variable Name: Variable Definition: Number of requests by the insured for appeals on final adverse determinations to an external review organization. This applies to each plan year, these data are reported for 2015-2023. Data Type: Text Variable Label: Issuer_External_Appeals_Filed Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Issuer-level data at the State level, for all QHPs on Exchange. Variable Name: Number of External Appeals Overturned Variable Definition: Number of final adverse determinations overturned

for 2015-2023.

upon request for external review, in whole or in part. This applies to each plan year, these data are reported



Data Type: Text

Variable Label: Issuer_Number_External_Appeals_Overturned

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Comments: Issuer-level data at the State level, for all QHPs on

Exchange.

Variable Name: Percent of External Appeals Overturned

Variable Definition: Percent of final adverse determinations overturned (#

external appeals overturned/# of external appeals filed) upon request for external review. This applies to each plan year; these data are reported for 2015-2023.

Data Type: Text

Variable Label: Issuer_Percent_External_Appeals_Overturned

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Numerical

Issuer

N/A

Comments: Issuer-level data at the State level, for all QHPs on

Exchange.

Variable Name: Number of Plan Level In-Network Claims with DOS in

2023 That Were Also Received in Calendar Year 2023

Variable Definition: Plan level number of claims received by an issuer asking

for a payment or reimbursement by or on behalf of an

in-network health care provider (such as a

hospital, physician, or pharmacy) that is contracted to be part of the network for an issuer (such as an HMO or PPO). These data are reported for plan year 2023.

Data Type: Text

Variable Label: Plan_Number_Claim_Received_In_Network

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Comments: Plan-level data at the State level, for all QHPs on

Exchange. Plan-level submission required starting in plan year 2020. 2018-2021 Plan-level claims received

and denied are aggregated by network status.



Variable Name: Number of Plan Level Out-Of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023 Variable Definition: Plan level number of claims received by an issuer asking for a payment or reimbursement by or on behalf of an out-of-network health care provider (such as a hospital, physician, or pharmacy) that is contracted to be part of the network for an issuer (such as an HMO or PPO). These data are reported for 2023. Data Type: Text Variable Label: Plan Number Claim Received Out Of Network Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Plan-level data at the State level, for all QHPs on Exchange. Plan-level submission required starting in plan year 2020. 2018-2021 Plan-level claims received and denied are aggregated by network status. Variable Name: Number of In-Network Plan Level Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023 Variable Definition: Number of plan level claims asking for a payment or reimbursement by or on behalf of an in-network health care provider (such as a hospital or doctor) that is contracted to be part of the network for an issuer (such as an HMO or PPO) that the issuer subsequently denied. These data are reported for 2023. Data Type: Text Variable Label: Plan Number Claim Denied In Network Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Plan-level data at the State level, for all QHPs on Exchange. Plan-level submission required starting in plan year 2020. 2018-2021 Plan-level claims received and denied are aggregated by network status. Number of Out-of-Network Plan Level Claims with DOS Variable Name: in 2023 That Were Also Denied in Calendar Year 2023

Variable Definition: Number of plan level claims asking for a payment or reimbursement by or on behalf of an out-of-network health care provider (such as a hospital or doctor) that is not contracted to be part of the network for an issuer (such as an HMO or PPO) that the issuer subsequently denied. These data are reported for 2023. Data Type: Text Variable Label: Plan Number Claim Denied Out of Network Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Plan-level data at the State level, for all QHPs on Exchange. Plan-level submission required starting in plan year 2020. 2018-2021 Plan-level claims received and denied are aggregated by network status. Variable Nameⁱⁱⁱ: Number of In-Network Plan Level Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023 Variable Definition: Number of plan level in-network claim resubmissions asking for a payment or reimbursement by or on behalf of a health care provider (such as a hospital or doctor) that is contracted to be part of the network for an issuer (such as an HMO or PPO) that the issuer previously denied. These data are reported for 2023. Data Type: Text Variable Label: Plan_Number_Claim_Resubmitted_In_Network Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Plan-level data at the State level, for all QHPs on Exchange. Plan-level resubmitted claims data required starting in plan year 2024. Variable Nameiii: Number of Out-Of-Network Plan Level Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023 Variable Definition: Number of plan level out-of-network claim resubmissions asking for a payment or reimbursement

by or on behalf of a health care provider (such as a



hospital or doctor) that is contracted to be part of the network for an issuer (such as an HMO or PPO) that the issuer previously denied. These data are reported for 2023.

Data Type: Text

Variable Label: Plan_Number_Claim_Resubmitted_Out_Of_Network

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Comments: Plan-level data at the State level, for all QHPs on

Exchange. Plan-level resubmitted claims data required

starting in plan year 2024.

Variable Name: Number of Plan Level Claims with DOS in 2023 That

Were Also Denied Due to Prior Authorization or Referral

Required in Calendar Year 2023

Variable Definition: Number of plan level in-network non- emergency claims

for service that required prior/pre-authorization, referral, prior approval, or precertification that were denied. This applies to each plan year; these data are

reported for 2018-2023.

Data Type: Text

Variable Label: Plan_Number_Claims_Denied_Referral_Required

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Comments: Plan-level data at the State level, for all QHPs on

Exchange. Plan level submission required starting in

plan year 2020.

Variable Name: Number of Plan Level Claims with DOS in 2023 That

Were Also Denied Due to an Out-Of-Network Provider

Claims in Calendar Year 2023

Variable Definition: Number of plan level claims denied for services from

outside of the plan's network of healthcare providers when the plan has a closed network. This applies to each plan year; these data are reported for 2018-2023.

Data Type: Text

Variable Label: Plan Number Claims Denied Due to Out of Network



Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Plan-level data at the State level, for all QHPs on Exchange. Plan level submission required starting in plan year 2020. Variable Name: Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Exclusion of a Service in Calendar Year 2023. Variable Definition: Total number of claims denied due to limitations or exclusions of certain services, test, treatment, admissions, supplies, etc. that are excluded, not covered, and/or limited under the plan, including claims denied as a result of a drug not being on the formulary. This applies to each plan year; these data are reported for 2018-2023. Data Type: Text Variable Label: Plan Number Claims Denied Services Excluded Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Plan-level data at the State level, for all QHPs on Exchange. Plan level submission required starting in plan year 2020. Number of Plan Level Claims with DOS in 2023 That Variable Name: Were Also Denied Due to Lack of Medical Necessity, excluding Behavioral Health in Calendar Year 2023 Variable Definition: Number of in-network plan level claims denied for healthcare services or supplies that do not meet the accepted standards to diagnose or treat an illness, injury, condition, disease, or its symptoms related to medical services. This applies to each plan year; these data are reported for 2018-2023. Data Type: Text Variable Label: Plan_Number_Claims_Denied_Not_Medically_ Necessary Excl Behavioral Health Allowable Values: Numerical



Data Source: Issuer Field Name from Data Source: N/A

Comments: Plan-level data at the State level, for all QHPs on

Exchange. Plan level submission required starting in

plan year 2020.

Variable Name: Number of Plan Level Claims with DOS in 2023 That

Were Also Denied Due to Lack of Medical Necessity, including Behavioral Health only in Calendar Year 2023

Variable Definition: Number of in-network plan level claims denied for

healthcare services or supplies that do not meet the accepted standards to diagnose or treat an illness, injury, condition, disease, or its symptoms related to medical services, related to behavioral/mental health. This applies to each plan year; these data are reported

for 2018-2023.

Data Type: Text

Variable Label: Plan_Number_Claims_Denied_Not_Medically_

Necessary_Incl_Behavioral_Health

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Comments: Plan-level data at the State level, for all QHPs on

Exchange. Plan level submission required starting in

plan year 2020.

Variable Nameⁱⁱⁱ: Number of Plan Level Claims with DOS in 2023 That

Were Also Denied Due to Enrollee Benefit Limit Reached

in Calendar Year 2023

Variable Definition: Number of in-network plan level claims denied

due to the beneficiary reaching an annual benefit limit.

These data are reported for plan year 2023.

Data Type: Text

Variable Label: Plan_Number_Claim_Denied_Due_To_Enrollee_

Benefit_Limit_Reached

Allowable Values:

Data Source:

Field Name from Data Source:

N/A

Comments: Plan-level data at the State level, for all QHPs on



Exchange. Submission required starting in plan year Variable Nameⁱⁱⁱ: Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Member Not Covered During All or Part of Date of Service in Calendar Year 2023 Variable Definition: Number of in-network plan level claims denied due to beneficiary's enrollment status at the time services were rendered. These data are reported for plan year 2023. Data Type: Text Variable Label: Plan Number Claim Denied Due To Member Not Covered Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Plan-level data at the State level, for all QHPs on Exchange. Submission required starting in plan year 2024. Variable Nameⁱⁱⁱ: Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Investigational, Experimental, or Cosmetic Procedure in Calendar Year 2023 Variable Definition: Number of in-network plan level claims denied due to the procedure being investigational, cosmetic, or experimental. These data are reported for plan year 2023. Data Type: Text Variable Label: Plan_Number_Claim_Denied_Due_To_Investigational_ Experimental Cosmetic Procedure Allowable Values: Numerical Data Source: Issuer Field Name from Data Source: N/A Comments: Plan-level data at the State level, for all QHPs on Exchange. Submission required starting in plan year 2024. Variable Nameⁱⁱⁱ: Number of Plan Level Claims with DOS in 2023 That Were Also Denied for Administrative Reasons in Calendar

Year 2023

Variable Definition:	Number of in-network plan level claims denied due to administrative reasons, such as: - Duplicate Claim - Missing/Insufficient Information - Untimely Claim Filing - Billing Provider Not Approved - Coordination of Benefit - Inconsistent Procedure Code/Diagnosis - Workers Comp/Liability Issue - Paid by Auto or Other Insurance - Unable to identify patient. These data are reported for plan year 2023.						
Data Type: Variable Label:	Text Plan_Number_Claim_Denied_Due_To_Administrative_ Reason						
Allowable Values: Data Source: Field Name from Data Source: Comments:	Numerical Issuer N/A Plan-level data at the State level, for all QHPs on Exchange. Submission required starting in plan year 2024.						
Variable Name:	Number of Plan Level Claims with DOS in 2023 That Were Also Denied for "Other" Reasons in Calendar Year 2023						
Variable Definition:	Number of in-network plan level denial of claims rejected for any reason not enumerated in another denial category. This applies to each plan year; these data are reported for 2018-2022.						
Data Type: Variable Label:	Text Plan_Number_Claims_Denied_Other						
Allowable Values: Data Source: Field Name from Data Source: Comments:	Numerical Issuer N/A Plan-level data at the State level, for all QHPs on Exchange. Plan level submission required starting in plan year 2020.						
Variable Name:	Financial Information						



Variable Definition: URL link to prior calendar year issuer-level information

about premiums, assets, and liabilities

Data Type: Text

Variable Label: Financial Information

Allowable Values: Free text

Data Source: **National Association of Insurance Commissioners**

Field Name from Data Source: N/A

Record relates to coverage at the issuer level. The Comments:

> information provided in the URL link reflects financial information that is current as of the date of initial

publication of the PUF.

Variable Name: Rate Review

Variable Definition: URL link to issuer rate review information.

Data Type: Text

Variable Label: Rate_Review

Allowable Values: Free text Data Source: Healthcare.gov

Field Name from Data Source: N/A

Comments: Record relates to coverage at the issuer level. The

information provided in the URL link reflects rate review

information that is current as of the date of initial

publication of the PUF.

Variable Name: Average Monthly Enrollment

Variable Definition: The average monthly number of enrollees who had

> effectuated coverage during the 2023 plan year. This metric is calculated by summing the member months of effectuated enrollment and dividing this sum by 12;

partial months of coverage are prorated.

Data Type: Text

Variable Label: Average_Monthly_Enrollment

Allowable Values: Free text **CMS** Data Source: Field Name from Data Source: N/A

Comments: 2015-2018 enrollment data reported at Issuer-level, for

> all QHPs on Exchange. 2015-2020 data represent plan level enrollment numbers, as measured by non-

cancell	ed	plan	sel	ections,	based	on	the	end	of t	he	prior
calenda	ar y	ear's	in	formation	on.						

Variable Name: Average Monthly Disenrollment

Variable Definition: The average monthly number of enrollees who both 1.

had effectuated coverage during the 2023 plan year, and 2. terminated their coverage in the given plan or issuer-county combination prior to the end of the plan year. This metric is a subset of the Average Monthly

Enrollment.

Data Type: Text

Variable Label: Average_Monthly_Disenrollment

Allowable Values: Free text
Data Source: CMS
Field Name from Data Source: N/A

Comments: 2015-2018 disenrollment data reported at Issuer-level,

for all QHPs on Exchange. 2015-2020 data represent plan level disenrollment numbers, as measured by cancelled plan selections, based on the end of the prior

calendar year's information.

ⁱ New variable for the PY2021 PUF

[&]quot; New variable for the PY2022 PUF

iii New variable for the PY2024 PUF