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**Date:** November 16, 2023

**From:** Lourdes Grindal-Miller, Director, Marketplace Plan Management Group

**Title:** Proposed Plan Year (PY) 2025 Qualified Health Plan (QHP) Data Submission and Certification Timeline

**Subject:** DRAFT Bulletin: Proposed Timing of QHP Data Submission and Certification for the 2025 Plan Year for Issuers in the Federally-facilitated Exchanges

## I. Purpose

The Centers for Medicare & Medicaid Services (CMS) is releasing this draft bulletin for comment. This bulletin proposes the submission deadlines under 45 CFR 155 subpart K for health insurance issuers applying to offer qualified health plans (QHPs) on the Federally-facilitated Exchanges (FFE).<sup>1</sup>

The Patient Protection and Affordable Care Act (ACA) and applicable regulations provide that health plans, including stand-alone dental plans (SADPs), must meet a number of standards in order to be certified as QHPs. Several of these are market-wide standards that apply to plans offered in the individual and small group markets, both inside and outside of the Exchanges. The remaining standards are specific to health plans seeking QHP certification from the Exchanges. The proposed dates in this bulletin would apply to all states in which an FFE operates, which include: 1) states performing plan management functions and making QHP certification recommendations to CMS, 2) states where CMS is performing all plan management functions and certifying QHPs while the state is enforcing the market-wide standards under the ACA, and 3) states where CMS is performing plan management functions and enforcing market-wide standards under the ACA (but the state continues to enforce state law requirements with which issuers must comply). Some of the proposed dates included in this bulletin would also apply to issuers in State-based Exchanges on the Federal Platform (SBE-FPs); additional information on these requirements will be provided in future guidance. Issuers should refer to these dates to help them successfully participate in any such Exchange in 2025.

In accordance with 45 CFR Part 155 subpart K, CMS will review, and approve or deny, QHP applications from issuers that are applying to offer QHPs on the FFEs. CMS will not conduct QHP certification reviews of plans that are submitted for offering only outside of the FFEs, except for SADPs seeking off-Exchange certification. The FFEs will not display ancillary insurance products and health plans that are not QHPs (e.g., stand-alone vision plans, disability, or life insurance products). The FFEs will only offer QHPs, including SADPs.

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<sup>1</sup> The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.

## II. Proposed PY2025 QHP Data Submission and Certification Timeline

Table 1 lists proposed key PY2025 dates for QHP certification applications and related data submissions. Additional information about the PY2025 QHP certification process will be provided in future guidance.

As in prior years, issuers will submit a complete QHP application for all plans they intend to have certified in a state in which an FFE is operating. Through an iterative process as shown in Table 1, CMS will review QHP applications for current and new issuers applying for QHP certification in an FFE. Issuers may have their QHP application denied if they fail to meet the applicable deadlines, or if their applications are not accurate or complete after the deadline for issuer submission of changes to the QHP application.<sup>2</sup>

Table 1. Proposed QHP Data Submission and Certification Timeline for Plan Year 2025

Activity	Dates
QHP Application submission and data validation window opens <sup>3</sup>	4/17/24
<b>Early Bird Application Deadline:</b> Optional Early Bird deadline for issuers to submit QHP Applications to CMS	5/15/24
CMS reviews Early Bird QHP Application data and releases results for issuers and states to review	4/18/24 – 6/7/24
HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS on behalf of the issuer <sup>4</sup>	5/21/24
<b>Initial Application Deadline:</b> Initial deadline for issuers to submit QHP Applications to CMS, including Plan ID Crosswalk data	6/12/24
QHP issuer submits the validated Quality Rating System (QRS) clinical measure data, with attestation, to CMS via NCQA’s Interactive Data Submission System (IDSS) <sup>5</sup>	6/14/24
CMS reviews initial QHP Applications and releases results for issuers and states to review	6/13/24 – 7/12/24
<b>Secondary Application Deadline:</b> Deadline for issuers to submit their QHP Application Rates Table Templates to CMS; optional deadline for issuers to submit corrected QHP Application data to CMS	7/17/24
CMS reviews Rates Table Template data and resubmitted QHP Application data, and releases results for issuers and states to review	7/18/24 – 8/9/24
Issuers, Exchange administrators, and CMS preview the 2024 QHP quality rating information	Aug./Sep. 2024
<b>Issuer Plan Confirmation/Crosswalk Deadline:</b> Issuers complete final plan confirmation and submit final Plan ID Crosswalk Templates	8/7/24 – 8/21/24
<b>Final Application Deadline:</b> Deadline for issuers to submit changes to their QHP Applications	8/14/24
CMS reviews QHP Applications and releases results for issuers and states to review	8/15/24 – 9/9/24
CMS sends QHP Certification Agreements to issuers	9/10/24

<sup>2</sup> Regulations at 45 CFR 155.1000 provide Exchanges with broad discretion to certify QHPs that otherwise meet the QHP certification standards specified in Subpart C of Part 156, and afford Exchanges the discretion to deny certification of QHPs that meet minimum QHP certification standards, but are not ultimately in the “interest” of qualified individuals and qualified employers.

<sup>3</sup> QHP Application submission is tentatively scheduled to begin on April 17, 2024 pending release of the final HHS Notice of Benefit and Payment Parameters for 2025. The QHP Application submission window will open and QHP Application materials, including templates and instructions, will be made available shortly after the release of the Payment Notice.

<sup>4</sup> QRS and QHP Enrollee Survey Technical Guidance for 2024, available at <https://www.cms.gov/files/document/qrs-and-qhp-enrollee-survey-technical-guidance-2024.pdf>.

<sup>5</sup> Each QHP issuer must submit and plan-lock its QRS clinical measure data by May 31 to allow the HEDIS® Compliance Auditor sufficient time to review, approve, and audit-lock all submissions by the June 14 deadline. There are no fees for QHP issuers associated with accessing and using the IDSS.

<b>Activity</b>	<b>Dates</b>
<b>QHP Agreement Signing Deadline:</b> Issuers return signed QHP Certification Agreements to CMS	9/10/24 – 9/18/24
<b>State Plan Confirmation Deadline:</b> States complete final plan confirmation	9/10/24 – 9/18/24
Limited data correction window	9/12/24 – 9/13/24
<b>Machine-Readable/URL Deadline:</b> Deadline for issuers’ machine-readable data to be posted and marketing URLs to be live and active	9/18/24
CMS releases certification notices to issuers and states	10/1/24 – 10/2/24
Anticipated public display of QHP quality rating information	11/1/24
Open Enrollment begins	11/1/24

### III. CMS Qualified Health Plan Application

Information and instructions about the process for issuers to complete a QHP application are made available annually at <https://www.qhpcertification.cms.gov>.

### IV. Where to Submit Comments

To submit comments on the proposed timeline outlined herein for QHP data submission and certification, please contact CMS at [QHP\\_Applications@cms.hhs.gov](mailto:QHP_Applications@cms.hhs.gov) with the subject line, “Proposed PY2025 QHP Timeline Bulletin Comment” on or before December 18, 2023.