

NOTICE TO ALL CARRIERS WRITING ACA INDIVIDUAL AND SMALL GROUP MAJOR MEDICAL AND STAND ALONE DENTAL FILINGS FOR PLAN YEAR 2020

Timeline for Plan Year 2020

- Single Risk Pool Rate and Form Filings (Individual and Small Group) IDOI Deadline – June 19, 2019
 - Filings need to be concurrent into BOTH HIOS and SERFF
 - Filings must include all forms and rates
 - Refer to plan management instructions in SERFF
 - The IDOI will complete review of single risk pool filings by September 16, 2019
- Qualified Dental Plan (QDP) filing deadline with IDOI – June 19, 2019
 - Filings need to be concurrent into BOTH HIOS and SERFF
 - Filings must include all forms and rates
 - Refer to plan management instructions in SERFF
 - The IDOI will complete the review of QDP filings by September 16, 2019

Essential Health Benefits 2020

- Indiana will be retaining the current 2017 Essential Health Benefit benchmark plan for the 2020 calendar year
 - Anthem BCBS Blue 5 Blue Access PPO Medical Option 6 Rx Option G
 - Pediatric Oral (FEDVIP)
 - Pediatric Vision (FEDVIP)
- Additional information is available at <https://www.in.gov/idoi/2812.htm>

SERFF Plan Management Instructions

- Binder submissions and form/rate filing submissions are required by Indiana for all ACA compliant, non-grandfathered plans that are part of the single risk pool as well as Stand Alone Dental Plans (SADPs)
- Additional information is available at <https://www.in.gov/idoi/2812.htm>

Formulary Review Updates

- The IDOI has updates its approach to reviewing for clinical appropriateness
- Please refer to the Power Point presentation and Excel document which are available at <http://www.in.gov/idoi/2813.htm>

Mid-Year Changes to Drug Formularies/Drug Costs and Out-of-Pocket Maximums

- Issuers can make changes to drug formulary when an equivalent drug is newly available mid-year
- Issuers can exclude a brand drug from essential health benefits when a generic is available
- Issuers can disregard the value of drug manufacturers' coupon in an enrollee's out-of-pocket maximum when a generic equivalent is available

Maximum Annual Limit on Cost-Sharing 2020

- The maximum limitation on cost-sharing for 2020 is \$8,150 (self-only) and \$16,300 (non-self-only) for non-CSR plans

- \$2,700 (self-only) and \$5,400 (non-self-only) for 100%-200% of FPL
- \$6,500 (self-only) and \$13,000 (non-self-only) for 200%-250% of FPL

Exchange User Fee

- 3% for Plan Year 2020

Premium Adjustment Percentage

- Reduced premium tax credits by an estimated \$900 million per year

Special Enrollment Periods

- The final rule creates a special enrollment period, at the option of the Exchange
- The new special enrollment period applies to off-Exchange enrollees who experience a decrease in household income and newly determined to be eligible for advance payments of the premium tax credit by the Exchange

MHPAEA

- The IDOI will be implementing a more focused review on MHPAEA and part of the review process will entail review of non-quantitative treatment limitations
- Additional information on MHPAEA can be found at [The Mental Health Parity Final Rule](#)
- Issuers may not place limits on the coverage for Medication Assisted Treatment for opioid dependence and must be applied using the same factors limitations on treatments for physical health conditions

Product Discontinuance

- Notification must be sent to policyholders at least 90 calendar days in advance before the date the coverage will be discontinued
 - Issuers should also send written notice of the product discontinuance to the Commissioner
 - Notification to policyholders should be approved by the IDOI prior to sending to policyholders
- Notification requirements are applicable for both grandfathered and non-grandfathered coverage in the large group, small group and individual market on and off Marketplace
- Additional information regarding notice requirements is available at <https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Final-Updated-Federal-Standard-Renewal-and-Product-Discontinuation-Notices-090216.pdf>

Reference Documents

- The IDOI Rate and Form Review will encompass information contained within the following reference documents and rules:
 - [2020 Notice of Benefit and Payment Parameters](#)
 - [2020 Final Letter to Issuers](#)
 - [2020 Plan Management/CMS Templates](#)