Proposed Key Dates for Calendar Year 2017¹: QHP Certification in the Federally-facilitated Marketplaces²; Rate Review; Risk Adjustment and Reinsurance

QHP Certification³

Activity		Dates
QHP Application	Initial FFM QHP Application Submission Window ⁴	4/5/2017 – 5/3/2017
Submission and Review Process	Submission deadline for all issuers to submit rate table templates for	5/3/2017
	single risk pool coverage that includes a QHP	
	CMS Review of Initial QHP Application Submissions Received as of	5/4/2017 – 6/5/2017
	May 3	3/4/2017 - 0/3/2017
	First Correction Notice Sent to Issuers	6/12/2017 – 6/13/2017
	Deadline for Submission of Revised QHP Data	6/27/2017
	CMS Review of Revised QHP Application Submissions Received as of	6/28/2017 – 7/28/2017
	June 27	0/28/2017 - 7/28/2017
	Second Correction Notice Sent to Issuers	8/7/2017 – 8/8/2017
	Final Deadline for Submission of QHP Data	8/21/2017
	Final CMS Review of Revised QHP Application Submissions Received	8/22/2017 – 9/5/2017
	as of August 21	6/22/2017 - 9/3/2017
QHP Agreement/Final Certification	Issuers send Agreements to CMS	9/12/2017 – 9/15/2017
	CMS sends Certification Notices with countersigned Agreements and	9/21/2017 – 9/22/2017
	final plan lists to Issuers	9/21/2017 - 9/22/2017
	CMS reviews and finalizes data for Open Enrollment	9/12/2017 – 10/23/2017
Open Enrollment		11/1/2017 – 1/31/2018

¹ This document summarizes key dates for calendar year 2017 regarding some activities and policies that are outlined in other documents that have not yet been finalized, such as the *Draft 2018 Letter to Issuers in the Federally-facilitated Marketplaces* (November 10, 2016), the *Patient Protection and Affordable Care Act; HHS Notice of Benefit and Payment Parameters for 2018; Proposed Rule*, (September 6, 2016), and the *DRAFT Bulletin: Timing of Submission and Posting of Rate Filing Justifications for the 2017 Filing Year for Single Risk Pool Coverage Effective on or after January 1, 2018* (November 10, 2016). CMS is not soliciting additional comments on the substance of the underlying policies or the proposed key dates through release of this document.

² Includes QHPs in FFMs where states perform plan management functions.

³ QHP certification information from the *Draft 2018 Letter to Issuers in the Federally-facilitated Marketplaces* (November 10, 2016), available at: https://www.cms.gov/cciio/index.html

⁴ URRT and Form Filing submissions to CMS in States in which CMS is either the Effective Rate Reviewer or direct enforcer of the Affordable Care Act federal reforms follow the same Initial Submission Window and Deadline as the QHP Initial FFM QHP Application Submission Window. This submission deadline applies to URRT and Form Filing submissions for single risk pool coverage (including QHPs and non-QHPs).

Rate Review for Single Risk Pool Coverage^{5,6}

Activity	Dates
Submission deadline for all rate filing justifications for single risk pool coverage (QHP and non-QHP) into the URR module of HIOS for issuers in a State without an Effective Rate Review program	5/3/17
Submission deadline for all rate filing justifications for single risk pool coverage (QHP and non-QHP) into the URR module of HIOS for issuers in a State with an Effective Rate Review program (unless a state sets an earlier deadline)	6/1/17
Change window closes for proposed rate filing justifications in HIOS URR module ⁷	6/21/17
Target date for initial proposed rate changes for single risk pool coverage (QHP and non-QHP) available for consumers to review on https://ratereview.healthcare.gov ⁸	6/30/17
Deadline for states with an Effective Rate Review Program to publicly post proposed rate increases subject to review for single risk pool coverage (QHPs and non-QHPs) (unless a state sets an earlier deadline)	6/30/17
Deadline for all rate filing justifications for single risk pool coverage that includes a QHP to be in a final status ⁹ in the URR system	8/21/17
Deadline for all rate fling justifications for single risk pool coverage that includes only non-QHPs to be in a final status in the URR system	10/6/17
Target date for CMS and states to post final rate information for single risk pool (QHPs and non-QHPs) (unless a state sets an earlier deadline)	11/1/17

⁵ Rate review dates from the *Draft 2018 Letter to Issuers in the Federally-Facilitated Marketplaces* (November 10, 2016), at: https://www.cms.gov/cciio/index.html and DRAFT Bulletin: Timing of Submission and Posting of Rate Filing Justifications for the 2017 Filing Year for Single Risk Pool Coverage Effective on or after January 1, 2018 (November 10, 2016), at https://www.cms.gov/cciio/index.html.

⁶ The term "single risk pool coverage" is used to describe non-grandfathered health insurance coverage in the individual or small group (or merged) market that is subject to the single risk pool provisions at 45 CFR 156.80 and required to submit rate information using the Unified Rate Review Template.

⁷ The change window closes at 3:00 pm, Eastern Standard Time, on this date.

⁸ CMS will post rate filing information for all single risk pool coverage proposed rate increases (not just those subject to review). CMS will not post information that is a trade secret or confidential commercial or financial information as defined in HHS's Freedom of Information Act regulations at 45 CFR 5.65.

⁹ There are three final submission statuses in HIOS. All submissions that do not have any rate increases subject to review (rate increases less than 10%) must be in a state of "Rate Filing Accepted." For submission with rate increases that are subject to review (rate increase of 10% or greater), the submission must be in a status of "Review Complete" if the rate increase received a determination of "not unreasonable" or in a status of "Final Justification Submitted" if the rate increase received a determination of "unreasonable" and the issuer has submitted the final justification.

Risk Adjustment and Reinsurance for Benefit Year 2016

Activity	Dates
First Bifurcated or Combined Reinsurance Contribution Amount Due	1/17/2017
Interim Risk Adjustment Report	3/2017
Deadline for Submission of Final Risk Adjustment/Reinsurance Data	5/1/2017
Risk Adjustment and Reinsurance Summary Report Released	6/30/2017
Remittance and Collection of Risk Adjustment and Reinsurance Payments and Charges Begins	8/2017
Second Bifurcated Reinsurance Contribution Amount Due	11/15/2017