

The following follow-up questions accompany the product standard training for 2016 rate filings.

1. What is the deadline to file Individual Grandfathered plans for an effective date of 1/1/2016?

While the was not stated in the training, the timeline is the same as small group. Since individual has an effective date of 1/1/2016, the filing date corresponds with Option #2, rates due 7/1/2015.

2. If we file a Small Group filing with a 4th quarter 2015 effective date, will we be able to file again for a 1st quarter 2016 effective date?

Yes.

3. Will rates that have two different pools be required to have a single index rate, or should they be developed separately. (As an example, pool A being Small Group ACA spanning the first three quarters, and pool B being a combination of Small Group ACA and Transitional spanning the fourth quarter)

The division would accept either methodology as long as the development is actuarially sound and meets the criteria of the Unified Rate Review Template.

4. Will early renewals be allowed for Small Group Transitional plans?

The law does not prevent employers from willingly renewing early.

5. Can we file for 3rd quarter 2016 later than 7/1/2015?

Yes. Deadlines for future filings will be announced at a later date.

6. Will transitional plans be required to have hearings?

Yes. Hearings for transitional plans will be no different than hearings for ACA plans.

7. Will written responses be considered after hearing?

Yes. We expect written responses of anything presented at the hearing. All responses need to be in SERFF/received by the division by the close of the public comment period.

8. Will SERFF be fixed to prevent 3rd parties from viewing filings before the filings go public?

No.

9. At what point in the review process will the division no longer accept new information?

The division will no longer accept new information after the initial decision has been communicated to the carriers.

10. What is the correct time for the afternoon hearings?

The hearings will take place between 1.00 pm to 4.00 pm PST.

11. What is the 2016 assessment for the Oregon Transitional Reinsurance Program?

It will be \$0.00 in 2016.

12. If reinsurance parameters change, what should we use to estimate recoveries?

Use the latest final parameters. The proposed parameters should be final before the ACA compliant filings are due on 4/15/2015.

13. The data for the cost and quality metrics may not be available in time for rate filing submission. Will a placeholder be accepted until the information is available?

Yes.

14. Wellness programs are no longer represented by a rating factor but do have an impact on the cost and utilization of the company. How will this be reviewed?

The impact of wellness programs on the overall plan cost must be reflected in the base rate development.

15. Will new entrants to the market be expected to list all of the cost containment efforts?

Yes.

16. Which years are being compared in Exhibit 3? 2015 to 2016?

Yes, Exhibit 3 focuses on the rate increase for this year only. Other exhibits relate to changes between base period and experience period

17. When does the Unified Rate Review Template (URRT) need to be submitted in the binder filing?

The URRT may need to be submitted twice. The first time is when the binder filing is submitted. After rates are approved, the URRT may need to be resubmitted with any updated information.

18. When do we submit the URRT in the HIOS filing?

HIOS submissions are tied to the rate filings. The URRT may need to be submitted twice: once when the HIOS submission is created, and once when the rates are approved.

19. Should the experience for groups sized 51-100 be included in the base experience for Small Group rate filings?

Groups sized 51-100 are not part of a discontinued market, so it is appropriate to include their experience in the rate filing.

20. Will there be a change in the regulation surrounding associations between 2014 and 2016?

There was a change in regulation between 2014 and 2015, but have been no changes between 2015 and 2016.

21. Will option 1 and option 2 for filing Transitional Plans require full filings?

With either option, these are full filings.

22. The article linked in the Standard Review Questions discusses uninsured. Do you have articles that discuss uncompensated care?

The article linked studies safety-net patients (those patients that otherwise cannot afford or gain access to care). The study was chosen because it was recently published by a local organization.

Other articles are available, but should not be the focus of any answer to this question. We are interested in the efforts made by the carriers to identify savings and pass that savings along to consumers.

23. When we price to the market average risk, do we use the OID's reinsurance numbers or do we use our own sense of the market average?

The OID does not prescribe any calculation or assumption. The OID's reinsurance calculations are used to set the parameters.

24. How is trend to be incorporated in Exhibit 3? For example, should it be historical or prospective? How do we reflect changes in experience?

Historical and prospective changes in the trend should be listed separately, as should changes in experience.

25. Transitional will be extending two years. Are we allowed a 13th month of trend?

Rate filings may not include more than 12 months of rates, and all rates must be approved. For this reason, any carrier choosing Option #2 for Small Group transitional filings must use the last approved rates for 4Q 2015. Any carrier choosing Option #1 will not have approved rates for 4Q 2016.

26. Should groups 51-100 be included in small group experience for 4th Quarter filings?

This is up to the carrier to decide. The division will consider any reasonable approach. Note that the 1Q 2016 rate filing for ACA compliant plans is mandatory.

27. Regarding second and third quarter 2016, will we be allowed to make trend adjustments for ACA filings?

Yes, quarterly trend adjustments are allowed on ACA filings. We will also allow 2nd and 3rd quarter rate filings to adjust rates for reasons other than trend. Filing deadlines have not been set for 2Q and 3Q 2016.

Errata on Product Standards:

Due to the late timing, these fixes will be incorporated after the 1Q 2016 filing cycle.

1. The product standards say that small group experience should “include” bonafide associations. This is inconsistent with the training.

Small group experience should exclude bona fide associations.

2. The product standards say grandfathered and non-grandfathered should not be pooled, yet we are instructed to include groups sized 51-100 in the small group experience. This is inconsistent.

Transitional and grandfathered must be pooled, per 2013 rating rules. This guidance has been provided outside of the rate filing process. The transitional program is intended to be temporary and transitional.

3. Why are there only 4 standard review questions?

The link has been updated.