

Accident and Health Filing Update, Webinar 1 March 1, 2016

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Chief Health Actuary





Celebrating 200 Years



Audience for Today's Webinar

- All accident and health carriers with rate and form filings



Mark Your Calendars for These Upcoming Webinars!

- **March 8**
 - Audience: major medical, student health plans, and major medical supplement
- **March 15**
 - Audience: ACA-compliant filings both on and off exchange, individual and small group, and dental
- **March 22**
 - Audience: On and off Marketplace plan management, Indiana-specific-individual and small group templates
- **March 29**
 - Audience: On and off Marketplace actuarial topics



IDOI Webinar Agenda



AGENDA

- Changes to our website
-
- Filing best practices
-
- Changes in SERFF
-
- Changes to IDOI filing requirements

Navigating IDOI's Updated Website

Indiana Department of Insurance

IDOI HOME

- Licensing
- Adjusters
- Consumer Services
- Company/Entity Financial Compliance
- Compliance Rates & Forms
- Healthcare Reform
- Enforcement
- Title
- Indiana Navigators
- Medical Malpractice
- Medicare and SHIP
- Long Term Care
- Insurance Laws, Rules & Bulletins
- Newsroom

Consumer Services

Online Services

- Rate Watch
- File a Patient's Compensation Fund Certificate of Insurance
- File a consumer complaint
- File a provider complaint
- Compare Medigap insurance policies
- Apply to be a bail agent
- Title Insurance Rate Comparison Tool
- Residential Real Estate Acquisition of Licensee Information and Numbers "RREAL IN" Database
- Forms.IN.gov
- Rules.IN.gov

More Online Services »
Subscriber Center »

Top FAQs | **I Want To...**

Welcome

PRODUCER LICENSING	HEALTHCARE	ABOUT	RESOURCES
<ul style="list-style-type: none"> Resident Renewal Non-Resident Renewal Transfer a License FAQs Service Request Form 	<ul style="list-style-type: none"> Healthcare Reform HIP 2.0 Indiana Navigators Medicare and SHIP Long Term Care 	<ul style="list-style-type: none"> IDOI Mission IDOI Leadership Brochures Complaint Process Enforcement Actions Media Contact IDOI CLE 	<ul style="list-style-type: none"> Ratewatch SERFF Filing Access Financial Forms Find Agent/ Agency/ Company Insurance Laws, Rules and Bulletins Rulemaking Docket Mine Subsidence Municipality Set-Aside Program

Notices of Public Hearing

Order of Supervision - Advantage Health Solutions | FAQ's

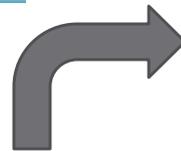
Notice of CE Meeting - January 2016 | LCE Meeting Agenda

Finding Compliance Rates and Forms

1. Visit our homepage

<http://www.in.gov/idoi/>

2. Under IDOI home, click “Compliance Rates and Forms”



IDOI HOME

- Licensing
- Adjusters
- Consumer Services
- Company/Entity Financial Compliance
- Compliance Rates & Forms**
- Healthcare Reform
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MORE ONLINE SERVICES »
SUBSCRIBER CENTER »

Top FAQs I Want To...

PRODUCER LICENSING

- Resident
- Resident Renewal
- Non-Resident
- Non-Resident Renewal
- Transfer a License
- FAQs
- Service Request Form

HEALTHCARE

- Healthcare Reform
- HIP 2.0
- Indiana Navigators
- Medicare and SHIP
- Long Term Care

ABOUT

- IDOI Mission
- IDOI Leadership
- Brochures
- Complaint Process
- Enforcement Actions
- Media Contact
- IDOI CLE

RESOURCES

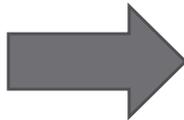
- Ratewatch
- SERFF Filing Access
- Financial Forms
- Find Agent/ Agency/ Company
- Insurance Laws, Rules and Bulletins
- Rulemaking Docket
- Mine Subsidence
- Municipality Set-Aside Program

Notices of Public Hearing

[Order of Supervision - Advantage Health Solutions](#) | [FAQ's](#)

Compliance Rates and Forms Page

3. Click on the circled links to access Forms, Rates and Reference Documents



Indiana Department of Insurance

Compliance Rates & Forms

- Rate Watch
- File a Patient's Compensation Fund Certificate of Insurance
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Company Compliance Rates & Forms

PROPERTY & CASUALTY	ACCIDENT & HEALTH	LIFE & ANNUITIES	RESOURCES
<ul style="list-style-type: none">• Filings• Review Standards• Individual Public Official Bond• Public Official Position Schedule• Bond• Public Official Name Schedule• Bond	<ul style="list-style-type: none">• Forms• Rates• Reference Documents	<ul style="list-style-type: none">• Filings• Review Standards	<ul style="list-style-type: none">• Important Notices• Public Access• Submission Requirements

Company Compliance

The mission of the Company Compliance Division is to protect insurance consumers by conducting policy form and rate reviews for compliance with Indiana laws and regulations. Insurance policy contract forms should not be inequitable, misleading or deceptive and rates should not be excessive, inadequate or unfairly discriminatory. Company Compliance reviews all types of product lines marketed in the state of Indiana, including Property & Casualty, Accident & Health, and Life and Annuity products.

Accident and Health Forms Available on the Website

ACA major medical checklists



Checklists for other than ACA major medical



Checklists for Medicare and Long term care



The screenshot displays the Indiana Department of Insurance website. The main heading is "ACCIDENT & HEALTH FORM FILING INFORMATION AND INSTRUCTIONS". Below this, there are four numbered steps: 1. All form filings for Accident & Health must be submitted via SEIFF. 2. Complete the appropriate checklist for the filing submitted. 3. Product filing fees must be submitted via Electronic Funds Transfer (EFT) at the time of the filing submission. 4. For additional details refer to Indiana General Instructions in SEIFF.

The page is divided into three main sections:

- ACA Compliant Major Medical**
 - 10(A) Individual Major Medical Checklist
 - 10(B) Individual Major Medical or Pediatric Dental plans on or off the Marketplace
 - 10(C) Individual HMO Checklist
 - 18(B) Individual Major Medical or HMO Individual Dental plans on or off the Marketplace
 - 20(A) Small Group Checklist
 - Small Group Major Medical or Pediatric Dental plans on or off the Marketplace
 - 22(A) Small Group HMO Checklist
 - 18(B) Small Group Major Medical or Pediatric Dental on or off the SHOP Marketplace
 - 21 Large Group Checklist
 - Large Group Major Medical and Dental plans
 - 21 Large Group HMO Checklist
 - 18(B) Large Group Major Medical and Dental plans
 - 20(C) Out of State Association/Trust Product Checklist
 - Major Medical certificates and related forms issued to Indiana residents when the policy is issued in a state other than Indiana.
- Other Than ACA Major Medical**
 - 10 Individual Checklist
 - Individual Accident and Health Filings including Grandfathered Major Medical and Dental plans
 - 12 Individual ERISA Checklist
 - 18(B) Individual Accident and Health Filings including Grandfathered Major Medical and Dental plans
 - 20 Small Group Checklist
 - Small Group Accident and Health Filings including Grandfathered Major Medical and Dental plans
 - 22 Small Group HMO Checklist
 - Small Group Accident and Health Filings including Grandfathered Major Medical and Dental plans
 - 21 Large Group Checklist
 - Large Group Accident and Health Filings including Grandfathered and Non-Grandfathered Major Medical and Dental plans
 - 21 Large Group HMO Checklist
 - 18(B) Large Group Accident and Health Filing including Grandfathered and Non-Grandfathered Major Medical and Dental plans
 - 20(C) Out of State Association/Trust Product Checklist
 - Product certificates and related forms issued to Indiana residents when the policy is issued in a state other than Indiana
 - 22 Student
 - Student products (including but not limited to student market plans)
- Medicare Supplement**
 - 14 Medicare Supplement Individual Checklist
 - 24 Medicare Supplement Group Checklist
- Long Term Care**
 - 16 Individual Long Term Care Checklist
 - 26 Group Long Term Care Checklist

Questions related to submitting Accident/Health Form Filings should be directed to:

Kim Joles
317-232-2390
kjoles@idi.in.gov

Paul Hydep
317-232-2421
phdep@idi.in.gov

Questions related to submitting Medicare Supplement Form Filings should be directed to:

Boobie Hiron
317-232-5645
bhiron@idi.in.gov

Questions related to submitting Long Term Care Form Filings should be directed to:

Barbara Fingman
317-232-2157
bfingman@idi.in.gov

Accident and Health Rating Info Available on the Website

- Binders
- Actuarial Memoranda Outlines
- Experience Workbooks

ACCIDENT & HEALTH RATE FILING AND PLAN MANAGEMENT BINDER INFORMATION AND INSTRUCTIONS

Rate (and Form/Rate) Filings

All Rate Filings for Accident & Health must be submitted via SERFF and include:

1. related policy form numbers
2. an Actuarial Memorandum (outlines below)
3. an Experience Workbook (unless this is a new product whose morbidity is not based on experience from similar products sold under the same parent company.)

Additionally, all fields in SERFF are expected to be completed. Guidance on the most important fields can be found in [Required Rate Fields in SERFF](#) , which can also be found on the Supporting Documentation tab in SERFF.

For full details of Filing requirements, see the Indiana General Instructions in SERFF.

Plan Management Binder Submissions

All ACA compliant Major Medical and Dental plans must be submitted annually in a Binder through Plan Management in SERFF. If there are changes to rates or forms, then a Rate or Form/Rate filing would also need to be submitted in SERFF. Note that all Plan Management templates and other documents that are submitted in HIOS must be identical to the same templates and documents in SERFF. Thus, updated templates and documents must be submitted to both HIOS and SERFF concurrently.

For full details of Plan Management requirements, see the [Indiana Plan Management General Instructions](#) . This can also be found in SERFF.

Filing Fees

Product filing fees for rates and policy forms must be submitted via Electronic Funds Transfer (EFT) at the time of filing submission. There are no filing fees for Binder Submissions. View General Instructions on the Filing Rules tab in SERFF for additional details.

Actuarial Memorandum Outlines

- File a Patient's Com Fund Certificate of I
- File a consumer con
- File a provider comp
- Compare Medigap p policies
- Apply to be a bail ag
- Title Insurance Rate Tool
- Residential Real Est: Acquisition of Licen: Information and Nu "RREAL IN" Databa:
- Forms.IN.gov
- Rules.IN.gov

MORE ONLINE SER SUBSCRIBER CENT

 Top FAQs | 

Filing Best Practices

- Download new checklists, outlines, and workbooks for each new filing
 - All items you need will be available in SERFF based on your TOI
- Make sure you add items under the appropriate tab within supporting documents
- Provide a redline copy when you make changes to the forms.
- Provide a redline copy of any changes other than rates in the rate manual.





Filing Best Practices

- You may find these requirements under Supporting Documentation:
 - A checklist (only on submissions including forms)
 - Actuarial memorandum outline
 - Required Rate Fields in SERFF
 - Experience Workbook
- Submit the completed checklist, workbook, or actuarial memorandum under the appropriate requirement
- Do not clone your filings
- PDFs need to be searchable
- Please call with questions



Reference Documents

New 2017 EHB documents

- New FedVip
- New Fed dental
- State benefits
- ACA related
 - Final letter to issuers
 - Notice of Benefit & Payment Parameters for 2016
 - 2016 others



Understanding SERFF



New Types of Insurance

- New TOI's and sub TOI's
- Student Health
- Blanket Sickness
- Pediatric dental
- Limited wrap-around coverage
- Others



Instructions For SERFF Filings

- Updated General Instructions
- Correct filing type
 - Form
 - Form/rate
 - Rate
- Implementation date
 - No less than 60 days after submission date
 - All rate filings need an implementation date





Instructions For SERFF Filings

General Instructions

- Market type
 - Individual
 - Group
- Group market size
 - For ACA. Specify small v. large and do not file together
- Overall rate impact
 - Carriers are required to submit
 - Should match the overall rate percent on the rate/rule schedule
- Filing description
 - Use this instead of cover letter
 - Include prior SERFF tracking number **in the first line**
 - If this is a new form, please indicate such

Form Schedule

- Always include final form here and redline changes under Supporting Documents.
- Include Policy, Certificate, and Applications.
- Review checklist changes from Supporting Documents
- PDFs need to be searchable





Rate/Rule Schedule

- Do not put Actuarial Memorandum here, please save in Supporting Documentation
- Each field needs to be filled out for rate changes
- Need to complete Overall Percentage of Last Rate Revision if applicable



Rate/Rule Schedule

- For rate changes use the correct description for Rate Change Type, under Rate/Rule Schedule
- Submit rates with any new filing
- The written premium should be for the 12 months prior to the requested implementation date.

Supporting Documentation

Requirements:

- Checklist
- Experience Workbook
- Actuarial Memo
- Required Rate Fields in SERFF



Additional documentation:

- Statement of Variability
- Third Party Authorization
- Readability Certification



Supporting Documentation

- Experience Workbooks (“EW”)
 - For anything that involves a new set of rates please submit a new EW
 - 4 Kinds: Maj Med, LTC, Med Sup, and Basic
 - For new filings, if based on sister company or other company experience, we expect an experience workbook and comparison of rates and benefits
 - Student Health plans will use Major Medical Experience Workbook



Supporting Documentation

- Experience Workbook
 - Do not create extra columns/rows
 - No text where it should be a number
 - Do not create your own Experience Workbook
 - Contact us if you have questions **BEFORE SUBMISSION**

Supporting Documentation

- Experience Workbook General Filing Information tab
 - Rows 18-20 must be completed because they populate the dates in the experience tabs.
 - Contact information will be used for correspondence on the filing as well targeted industry emails.

A	B
1 Notes to Reviewer:	
2	
3	
4	
5	
6 Experience Workbook: General Filing Information	
7 Instructions: Please fill in the required fields, which are highlighted in blue. Rows 18-20 will populate the years in the experience tabs.	
8	
9 SERFF Tracking Number of This Filing	
10 Source of Support for Rates	
11 Company Name	
12 Implementation Date (mm/dd/yyyy)	
13 Open/Closed/Mixed	
14 CoCode	
15 Group Code	
16 Previous Writing Companies	
17 Third Party Administration	
18 Earliest Experience Period Start (mm/dd/yyyy)	2/5/2011
19 Actual Experience End Date (mm/dd/yyyy)	6/1/2015
20 Projected Experience End Date (mm/dd/yyyy)	1/1/2020
21 Contact Information	
22 Name of Rates Contact	
23 Phone Number of Rates Contact	
24 Email of Rates Contact	

Supporting Documentation

- Experience Workbooks
 - Plan Overview
 - Rate changes are segregated into
 - (A)=One Time Rate Changes (no Trend)
 - (B)=Annualized Premium Trend
- The Overall % Rate Impact reported on the Rate/Rule Schedule is equal to $[(1+(A))*(1+(B))-1]*100\%$

	A	B	C	D	E	F	G	H
1	Notes to Reviewer:							
2								
3								
4								
5								
6	Experience Workbook: Plan Overview							
7	Instructions: Please fill in the required fields, which are highlighted in blue.							
8								
9								
10						Proposed One Time Rate Change (no Trend)		Assumed Annualized Premium Trend (No Aging)
11	Plan Name(s)	Original Target Loss Ratio	Current Target Loss Ratio	Original Interest Rate	Current Interest Rate	Indiana	Nationwide	Indiana and Nationwide
12								
13								
14								
15								
16								
17								



Supporting Documentation

- Actuarial Memos
 - PDF's must be searchable
 - Can use provided template or a format of your own choosing
 - Generally, we like to see comparisons of existing products to the proposed filing; this should be included as an additional exhibit and show differences in benefits
 - Make sure you comply with existing Actuarial Standards of Practice



Supporting Documentation

- Required Rate Fields in SERFF
 - If you have a rate change, review our instructions in Required Rate Field in SERFF at www.in.gov/idoi/files/Required_Rate_Fields_in_SERFF.pdf
 - Significant changes in the Required Rate Field instructions
 - MAKE SURE YOU READ IF YOU HAVE NOT FILED RECENTLY

Medicare Supplement



- Medicare Supplement Refund Calculation
- Email these to: compliance@idoi.in.gov
- Please indicate Medicare Supplement Refund Calculation in the subject line.



Companies and Contact; Filing Correspondence Tabs

- **Companies and Contact**
 - It is possible to put a secondary contact person for form/rate
- **Filing Correspondence**
 - What information is considered public?
EVERYTHING
 - If you need additional time, please submit a note to reviewer

IDOI Contact Information

- **Karl Knable, Chief Health Actuary**
 - kknable@idoi.in.gov
 - 317-232-2416
- **Stephen Chamblee, Associate Actuary**
 - schamblee@idoi.in.gov
 - 317-234-7993
- **Bobbi Henn, Policy Analyst**
 - bhenn@idoi.in.gov
 - 317-232-5693
- **Indiana Compliance Mailbox**
 - compliance@idoi.in.gov



Any Questions?

- Don't forget to register for Webinar 2 -- MHPAEA, Student Health Plans, & Renewal Letters!
- The intended audience for this March 8 webinar is major medical, major medical supplement, student health, dental, grandfathered, transitional, and ACA-compliant plans with rate and form filings