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

**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