



COVERED
CALIFORNIA

PLAN MANAGEMENT ADVISORY GROUP

March 2, 2017

WELCOME AND AGENDA REVIEW

ROB SPECTOR, CHAIR
PLAN MANAGEMENT ADVISORY GROUP

AGENDA

AGENDA
Plan Management and Delivery System Reform Advisory Group
Meeting and Webinar
Thursday, March 2 , 2017, 10:00 a.m. to 12:00 p.m.

Webinar link: <https://attendee.gotowebinar.com/register/8674600665841880066>

Welcome and Agenda Review	10:00 - 10:05 (5 min.)
2018 Market Stabilization Regulations	10:05 – 11:05 (60 min.)
2018 Certification Update	11:05 – 11:25 (20 min.)
Dental Benefit Design Update	11:25 – 11:35 (10 min.)
Future Topics Planning Session	11:35 – 11:55 (20 min.)
Open Forum and Next Steps	11:50 – 12:00 (10 min.)

PLAN MANAGEMENT ADVISORY GROUP

NEW 2017 MEMBERSHIP

David Brabender*

Independent Health Insurance Agent
Legislative Chair, Sacramento Association of Health Underwriters

Douglas Brosnan

Emergency Room Physician
Sutter Roseville Medical Center
Director of Provider Relations, CEP America

Mary June Flores

Policy and Legislative Advocate
Health Access California

Emalie Huriaux

Director of Federal and State Affairs
Project Inform

Betsy Imholz

Special Projects Director
Consumers Union

Richard Kronick

Professor, Division of Health Care
Department of Family and Preventive Medicine
School of Medicine
University of California, San Diego

April Martin

Director, Managed Care
Dignity Health

James Mullen

Director, Public & Government Affairs
Delta Dental of California

Robert O'Reilly

Director of Policy
Molina Health Plan

Bill Phelps*

Chief of Program Services
Clinica Sierra Vista

Cary Sanders

Director, Policy Analysis & Having Our Say Coalition
California Pan-Ethnic Health Network

Robert Spector

Area Vice President, Covered California Health Insurance Exchanges
Blue Shield of California

Bill Wehrle

Vice President, Health Insurance Exchanges
Kaiser Permanente

**New as of March 2017*

2018 MARKET STABILIZATION REGULATIONS

KATIE RAVEL, DIRECTOR
POLICY, PROGRAM INTEGRITY AND RESEARCH
ALLIE MANGIARACINO, SENIOR QUALITY ANALYST
PLAN MANAGEMENT DIVISION



PROPOSED FEDERAL REGULATIONS AND POTENTIAL ADJUSTMENTS TO STANDARD PLAN DESIGNS

This draft working document examines potential ways to respond to the new proposed federal regulations released on February 15, 2017 if new de minimis limits are adopted for the 2018 Plan Year. Covered California is considering the four options presented here and seeks comments from stakeholders on the preferred approach. Covered California understands that some changes in the proposed federal regulations may require changes in state law. In those instances, Covered California will work with the regulators and federal partners to determine whether any changes in state law may be necessary.

March 2, 2017

PROPOSED RULE: PPACA MARKET STABILIZATION

Summary of proposed changes to levels of coverage (actuarial value) (§156.140)

- Amends the definition of the de minimis range to a variation of -4/+2 percentage points, rather than +/-2 (silver plan variations remain at +/-1)
- Bronze plans that either cover and pay for at least one major service, other than preventive, before deductible or meet HDHP requirements have a variation of -4/+5

Possible national implications:

- **APTC recipients:** This may result in a “race to the bottom” in other states if all individual market plans move to 66% AV, resulting in increased cost-sharing for low-income enrollees due to the narrowed scope of benefits (i.e. higher deductible and copays) and smaller tax credits.
- **Non-Subsidized enrollees** have higher cost-sharing, but cheaper premiums

Possible California market impacts:

- Covered California’s Patient-Centered Benefit Plan Designs are a set of standard benefits that must be offered on and off Exchange, though carriers on the individual market may offer their own unique ACA-compliant benefit designs off-Exchange (“non-mirror” products), in addition to the standard benefit packages.
- An estimated 90% of the individual market on and off Exchange is enrolled in the standard benefit designs; a policy decision on whether to lower the Silver AV has APTC implications mentioned above and affects ability of standard-benefit products to compete with off-Exchange, non-mirror products. The current standard Silver has an AV of 71.5%.
- Non-subsidized enrollees may leave Exchange to seek cheaper products off Exchange

IMPLICATIONS FOR CALIFORNIA

- Covered California's current proposed Silver for 2018 is 71.9%: The proposed changes from 2017 to 2018 include a lower pharmacy deductible (\$100) and making generic drugs subject to deductible.
- Carriers could use this rule change to offer stripped-down plans, particularly for Silver:
 - Three contracted carriers already offer Silver off-exchange, non-mirror plans, two of which are “stripped down” (i.e. most services apply to deductible, high deductible)
- **Cheaper Silver plans could greatly reduce unsubsidized enrollment, moving these enrollees to much cheaper off-Exchange, non-mirror plans**

	SUBSIDIZED	UNSUBSIDIZED
	% enrollment	% enrollment
CATASTROPHIC	0.42%	0.71%
BRONZE	17.72%	3.71%
Bronze-HDHP	4.70%	1.38%
SILVER	10.79%	5.12%
Silver 73	9.21%	0.01%
Silver 87	23.57%	0.01%
Silver 94	14.62%	0.01%
GOLD	3.32%	1.56%
PLATINUM	2.02%	1.12%
Grand Total	86.38%	13.62%

Note: As stated on slide 5, some changes in the proposed federal regulations may require changes in state law. In those instances, Covered California will work with the regulators and federal partners to determine whether any changes in state law may be necessary.

2017 RATES: NON-MIRROR vs. STANDARD PLANS

SILVER

	ANTHEM			
	Silver Pathway 1900	Silver Pathway 2000	Silver Pathway (HMO) 2650	Standard Silver
Los Angeles, Age 32	\$348	\$340	\$243	\$389
Los Angeles, Age 55	\$655	\$641	\$458	\$734

BLUE SHIELD		
Silver 1850	Silver Seven 3750	Standard Silver
\$322	\$336	\$353
\$608	\$633	\$665

KAISER		
Silver 70 1750/40	Silver HDHP 2700/15%	Standard Silver
\$293	\$268	\$310
\$553	\$506	\$585

BRONZE

	ANTHEM			
	Bronze Pathway 5250	Bronze Pathway 5850	Bronze Pathway 6900	Standard Bronze
Los Angeles, Age 32	\$272	\$266	\$277	\$274
Los Angeles, Age 55	\$513	\$501	\$523	\$517

BLUE SHIELD	
Bronze 5550	Standard Bronze
\$285	\$300
\$538	\$566

KAISER	
Bronze HDHP 5500/40%	Standard Bronze
\$223	\$225
\$421	\$424

Red Bold = cheapest plan in metal tier *offered in market*

Orange Bold = cheapest plan in metal tier *offered by the carrier*

OPTIONS FOR CONSIDERATION

If CMS proceeds with a change to the de minimis range, Covered California will need to reconsider its standard design options to retain healthy, unsubsidized enrollment and to be able to compete with off-Exchange, non-mirror products.

Covered California is considering the following options:

- 1) Maintain current standard Silver proposal (AV=71.9%)
 - 1a) Maintain current standard Silver proposal while lowering AV for Bronze, Gold, and Platinum. Note that low-AV options already exist in the Platinum and Gold copay plans.
- 2) Reduce Silver plan AV by 2-4% in expectation of cheaper Silver offerings in the off-Exchange, non-mirror market
- 3) Offer a “Bronze Plus” plan with an AV of 63-65% and a “Bronze Lite” with an AV of 56-58%
- 4) Maintain current proposed plan designs and add new requirements for non-mirror plans in the QHP Contract

The following slides outline pros and cons for each option and include sample plan designs to illustrate cost-sharing tradeoffs for options 2 and 3.

OPTION 1

Maintain current standard Silver proposal (AV=71.9%)

Rationale: Maintain consistency year-to-year regardless of federal changes

PRO

- Consistent with Covered CA principles on standard benefit design
- Easy messaging to consumers on plan design changes
- Approval already in progress
- Generous APTC (relative to other options presented in these slides)

CON

- Expensive premiums compared to off-Exchange Silver offerings
- Could lose most healthy unsubsidized to off-Exchange market (but mitigated by inertia and better benefits)
- Loss of Covered CA revenue stream

OPTION 2

Reduce Silver plan AV by 2-4%

Rationale: Offer a cheaper Silver in expectation of low-AV Silver offerings in the off-Exchange, non-mirror market (see options on next slide)

PRO

- Ability to tout lower Silver premiums in 2018
- Keep unsubsidized, healthy enrollees in Silver plans

CON

- Dramatic changes required from previous years, including applying deductible to more services
- Inconsistent with Silver approach built up over four years
- Could be a major “gotcha” to consumers settled into the Silver design
- Higher cost-sharing could result in barriers to care
- Lower APTC (Average: \$70 per enrollee / \$80 million total loss for California)

OPTION 2 (cont.): SILVER PLAN DESIGN OPTIONS (AV 70, 68, 66)

Benefit	Current Proposed Silver		Silver 70		Silver 68		Silver 66	
	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount
Deductible								
Medical Deductible		\$2,500		\$3,000		\$4,350		\$5,500
Drug Deductible		\$100		\$100		\$100		\$250
Coinsurance (Member)		20%		20%		20%		20%
MOOP		\$7,000		\$7,000		\$7,000		\$7,000
ED Facility Fee		\$350	X	\$350	X	20%	X	20%
Inpatient Facility Fee	X	20%	X	20%	X	20%	X	20%
Inpatient Physician Fee	X	20%	X	20%	X	20%	X	20%
Primary Care Visit		\$35		\$35		\$50		\$50
Specialist Visit		\$70		\$70		\$75		\$75
MH/SU Outpatient Services		\$35		\$35		\$50		\$50
Imaging (CT/PET Scans, MRIs)		\$300		\$300	X	20%	X	20%
Speech Therapy		\$35		\$35		\$50		\$50
Occupational and Physical Therapy		\$35		\$35		\$50		\$50
Laboratory Services		\$35		\$35		\$35		\$35
X-rays and Diagnostic Imaging		\$70		\$70		\$70		\$70
Skilled Nursing Facility	X	20%	X	20%	X	20%	X	20%
Outpatient Facility Fee		20%		20%	X	20%	X	20%
Outpatient Physician Fee		20%		20%	X	20%	X	20%
Tier 1 (Generics)	X	\$15	X	\$15	X	\$15	X	\$15
Tier 2 (Preferred Brand)	X	\$55	X	\$55	X	\$55	X	\$55
Tier 3 (Nonpreferred Brand)	X	\$80	X	\$80	X	\$80	X	\$80
Tier 4 (Specialty)	X	20%	X	20%	X	20%	X	20%
Tier 4 Maximum Coinsurance		\$250		\$250		\$250		\$250
Maximum Days for charging IP copay								
Begin PCP deductible after # of copays								
Actuarial Value (2018 AVC)		71.87		69.71		68.08		66.20

Key: Increase member cost from current proposed Silver
X Subject to deductible



OPTION 3

Offer a “Bronze Plus” plan with an AV of 63-65% and a “Bronze Lite” with an AV of 56-58%

Rationale: Offer a more generous Bronze plan, in addition to a low-AV standard Bronze, to compete with low-AV Silver plans off Exchange

PRO

- Would not interfere with APTC
- Compete with off-Exchange products
- Keep unsubsidized, healthy enrollees on Exchange with an in-between option (and potentially draw new enrollees)
- Offer a very low-cost option for Bronze enrollees

CON

- Increased differentiation and confusion in plan design options (presents a third Covered CA Bronze option)
- Inconsistent with Bronze approach built up over four years
- Operational challenges implementing a third Bronze plan (e.g. CalHEERS)

OPTION 3 (cont.): BRONZE PLAN DESIGN OPTIONS

This plan design for a “Bronze Lite” differs from the low-AV options presented in the preceding slide:

- This plan design assumes that California law can be interpreted to set the MOOP at the maximum allowed of \$7,350 (i.e. MOOP is not set \$350 lower to accommodate enrollees purchasing standalone pediatric dental products)
- “3-visit rule” (member pays a copay for the first 3 visits; visits afterward are subject to the deductible) is maintained for primary care, specialist, and MH/SU office visits.

This plan is less generous than the current proposed Bronze in the following ways:

- Medical deductible increased from \$6,000 to \$6,350
- Drug deductible increased from \$500 to \$1,000 (maximum allowed under CA drug cap laws)
- Speech/Occupation/Physical Therapy and Labs are subject to the deductible.

Benefit	Bronze Lite	
	Ded	Amount
Deductible		
Medical Deductible		\$6,350
Drug Deductible		\$1,000
Coinsurance (Member)		100%
MOOP		\$7,350
ED Facility Fee	X	100%
Inpatient Facility Fee	X	100%
Inpatient Physician Fee	X	100%
Primary Care Visit	X	\$75
Specialist Visit	X	\$105
MH/SU Outpatient Services	X	\$75
Imaging (CT/PET Scans, MRIs)	X	100%
Speech Therapy	X	100%
Occupational and Physical Therapy	X	100%
Laboratory Services	X	100%
X-rays and Diagnostic Imaging	X	100%
Skilled Nursing Facility	X	100%
Outpatient Facility Fee	X	100%
Outpatient Physician Fee	X	100%
Tier 1 (Generics)	X	100%
Tier 2 (Preferred Brand)	X	100%
Tier 3 (Nonpreferred Brand)	X	100%
Tier 4 (Specialty)	X	100%
Drug Cap - Maximum Coinsurance		\$500
Maximum Days for charging IP copay		
Begin PCP deductible after # of copays		3
Actuarial Value (2017 AVC)		59.34

The final 2018 Benefit and Payment Parameters set the 2018 annual limitation on cost sharing (MOOP limit) at \$7,350.

As CMS considers an expanded de minimis range for Bronze, it is worth noting that a Bronze plan of 56% is technically impossible given the \$7,350 annual limitation.

We estimate that a 56% plan can be achieved if CMS raises the annual limit to \$8,500.

Key:

■ Increased member cost from current proposed Bronze

X Subject to deductible



OPTION 3 (cont.): BRONZE PLAN PREMIUM ESTIMATES

The following table presents the estimated weighted-average bronze premium for “Bronze Plus” and “Bronze Lite” plans, using the weighted-average premium for the 2017 Bronze plan as a reference point.

Plan Design Name	AV	Estimated Monthly Premium		% difference from current Bronze
		Age 25	Age 40	
Bronze Lite	56.00	\$ 194.08	\$ 247.05	-9.6%
Current 2017 Standard Bronze	61.93	\$ 214.64	\$ 273.21	--
Bronze Plus	64.99	\$ 225.24	\$ 286.71	4.9%

OPTION 4

Maintain current proposed plan designs and add new requirements for non-mirror plans in the QHP Contract

Rationale: Prevent flow of enrollment into stripped-down health plans and set consumer-friendly standards in the entire individual market

PRO

- Would not interfere with APTC
- Set standards in entire individual market, such as adherence to VBID, first-dollar coverage for some services, etc.

CON

- Opposition by contracted carriers
- Takes away cheaper options for off-Exchange market

2018 CERTIFICATION UPDATE

TAYLOR PRIESTLEY, CERTIFICATION PROGRAM MANAGER
PLAN MANAGEMENT DIVISION

BOB MANZER, DEPUTY DIRECTOR
SMALL BUSINESS EXCHANGE AND AGENT PROGRAM MANAGEMENT

PROPOSED 2018 QHP CERTIFICATION MILESTONES

Updated 3/2/2017

Release draft 2018 QHP & QDP Certification Applications	December 22, 2016
Draft application comment periods end	January 13, 2017
Plan Management Advisory: Benefit Design & Certification Policy recommendation	January 19, 2017
January Board Meeting: discussion of benefit design & certification policy recommendation	January 26, 2017
Letters of Intent Accepted	February 1 – 15, 2017
Final AV Calculator Released*	February 2017
Applicant Trainings (electronic submission software, SERFF submission and templates*)	February 22-24, 2017
March Board Meeting: anticipated approval of 2018 Standard Benefit Plan Designs & Certification Policy	March 14, 2017
QHP & QDP Applications Open	March 3, 2017
QDP Application Responses (Individual and CCSB) Due	May 1, 2017
Evaluation of QDP Responses & Negotiation Prep	May - June 2017
QDP Negotiations	June 2017
QHP Application Responses (Individual and CCSB) Due	May 1, 2017
Evaluation of QHP Responses & Negotiation Prep	May - June 2017
QHP Negotiations	June 2017
QHP Preliminary Rates Announcement	July 2017
Regulatory Rate Review Begins (QHP Individual Marketplace)	July 2017
CCSB QHP Rates Due	July 17, 2017
QDP Rates Announcement (no regulatory rate review)	August 2017
Public posting of proposed rates	July 2017
Public posting of final rates	October 2017

*Final AV Calculator and final SERFF Templates availability dependent on CMS release

TBD = dependent on CCIIO rate filing timeline requirements

2018 QHP/QDP CERTIFICATION APPLICATION REVISIONS

Applications opening March 3rd reflect the following changes:

Currently Contracted Applicants

QHP Issuers contracted for Plan Year 2017 will complete a simplified certification application since their three year contract with the Exchange imposes ongoing requirements included in the certification application and this contract performance is considered in the evaluation process.

- Updates to 2017 application responses accepted for Customer Service and Financial Requirements
- Fraud, Waste, and Abuse responses limited to new questions
- QHP delayed submission deadline of July 10, 2017 for Quality and Quality Improvement Strategy (QIS) submissions

Simplified CCSB Applications

Applicants completing the Individual Marketplace applications may refer to those responses, if applicable, for the following sections:

- Fraud, Waste, and Abuse; Healthcare Evidence Initiative; Privacy and Security; Provider Network; Quality; QIS

Document Clean-up

- Corrected response options
- Updated System for Electronic Rate and Form Filing (SERFF) Template links

COVERED CALIFORNIA FOR SMALL BUSINESS (CCSB) ALTERNATE BENEFIT DESIGNS

CCSB encourages the proposal of Alternate Benefit Designs (ABDs) by CCSB Applicants.

ABD Proposal Details:

- Up to two ABDs per metal tier may be proposed for applicant's geographic licensed service area.
- ABD proposals must comply with state statutory and regulation requirements.
- ABD proposals are voluntary and are not required

Plan Year 2018 ABD proposals must include the following components:

- Description of rationale and benefit to members of proposed ABD offer.
- Description of the population that the ABDs are meant to benefit.
- Description of differences in coverage that are incorporated into the proposed ABD vs. standard plan.
- Indication of any additional or enhanced benefits relative to the Essential Health Benefits (EHBs) with confirmation of no actuarial value impact
- Confirm if plans include pediatric dental EHB.

COVERED CALIFORNIA FOR SMALL BUSINESS (CCSB) ALTERNATE BENEFIT DESIGNS

For Plan Year 2018, CCSB will include consideration of proposed premium rates in the evaluation of proposed Alternate Benefit Designs (ABDs). To accommodate this change and minimize administrative burdens on CCSB applicants, staff proposes the following adjusted timeline:

May 1, 2017: QHP Certification Application for Covered California for Small Business Due

Friday June 30, 2017: ABD proposals due in Proposal Tech

- Attachment G benefit design and alternative cost-sharing proposal (*existing*)
- Attachment H Preliminary Premium Rates (*new*)
 - 40 year old rates for all standard and alternate plans proposed, all regions proposed

Friday July 7, 2017: ABD Proposals Decisions communicated to Applicants

Monday July 17, 2017: Only approved ABDs included in SERFF submissions and rate filings

If ABD evaluations are not completed before the July 17 rates submission, CCSB Applicants will need to remove any potential rejected ABDs from SERFF templates at a later date

DENTAL BENEFIT DESIGN UPDATE

TAYLOR PRIESTLEY, CERTIFICATION PROGRAM MANAGER
PLAN MANAGEMENT DIVISION

EMPLOYER-SPONSORED DENTAL BENEFIT DESIGN

Dental Copay Schedule

- Some Diagnostic and Preventive procedure codes changed from “Not Covered” to “No Charge” to allow coverage of these services if dental plans choose

Employer-Sponsored Dental Benefit Design

Benefit Design

- No waiting period for any service category.
- Periodontal Services included in Basic Services.

Enrollment

- Employer choice to offer employer-sponsored Group Dental Plan only.
- Employer required to contribute 50% of the premium for the Group Dental Plan **and** meet 70% participation of eligible employees for enrollment in the Group Dental Plan.
- No other dental plans are offered to employees.
- If the participation rate isn't met then all employees are notified, CCSB invalidates selections, and all employees are offered the regular array of Children's and Family Dental Plans.

FUTURE TOPICS PLANNING SESSION

ROB SPECTOR, CHAIR
PLAN MANAGEMENT ADVISORY GROUP
LINDSAY PETERSEN, QUALITY SPECIALIST
PLAN MANAGEMENT DIVISION

2017 FUTURE STRATEGIC TOPICS: PROPOSED SCHEDULE

Meeting Month	Strategic Topic	Expected Outcomes
2-Mar	2018 Stabilization Regulations	Gather input for Covered California comments on 2018 stabilization regulations and discuss policy change options.
6-Apr	Account Based Health Plans (HDHP, HSA, HRA)	Awareness of the current operational capabilities for account based health plans; Primer on the different types of account based plans; Ideas on operational, policy and member facing impacts on Account Based Health Plans (ABHP) in alignment with potential ACA changes.
11-May	Consumer Lifecycle Work Group- Input Session	Covered California is embarking on a long term “lessons learned” project to improve the consumer experience. The initial phase will review how various channels (Covered California, agents, navigators, enrollment system etc.) interact with consumers in efforts to understand weaknesses and gaps to strategize on improvements. Goal is to introduce the project and discuss the potential for Advisory and/or sub work group involvement.
11-May	Integrated Timelines: Federal, State and Covered CA	Review how Federal and State law cycle overlap with Covered California’s certification cycle and major decision points for each. Goal is to set groundwork for understanding when changes for 2019 would likely come and when response actions would need to be taken by Covered California.
8-Jun	Covered California Provider Directory	Demonstrate proposed member functionality for provider look up & PCP selection; Feedback on improving experience and developing readiness plans.
13-Jul	Primary Care QIS: PCP for PPO and PCMH update and input gathering session	Gather ideas to improve the assignment and rollout for new members and how to improve awareness and positive acceptance of PCP in the PPO environment.
10-Aug	Off Exchange Products - Market Scan	Gather ideas on any benefit designs found off exchange (non-mirrored) that should be considered for on-exchange. Understand why members purchase off-exchange with a focus on subsidy eligible (as a mechanism to improve targeting for CC enrollment)
10-Aug	Open Enrollment 2018 User Experience	Consider variety in telehealth offerings and possibility of best practice encouragement. Preview for stakeholders, no specific outcomes.
28-Sep	Healthcare Evidence Initiative (Truven) Progress	Share a baseline on key metrics in our quality agenda/dashboard based on the data submitted via Truven (disparities, etc); share top priorities in research queue.
<i>No Oct meeting</i>		
9-Nov	Hospital Safety QIS	Goal is to hold an update and input session on network improvements so far and momentum gained (number of hospitals signed up for HIINs and CMQCC, improvement in timing of data flow, annual C-Section Honor Roll etc.) and on payment strategies for quality and for reducing low risk C section.
14-Dec	Health Disparities QIS	Goal is to hold an input session on plan submissions, efforts to improve rates of data capture, and preliminary work and best practices discussion on projects to improve chronic disease management (Plan Care Management Programs).

WRAP UP AND NEXT STEPS

JAMES DEBENEDETTI, DIRECTOR
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