



Office of

Personnel Management

The Federal Government's Human Resources Agency

Multi-State Plan Program Issuer Letter

Number: 2017-001

Date: January 24, 2017

Subject: Multi-State Plan Program Annual Letter for Plan Year 2018

INTRODUCTION

As the Office of Personnel Management's Multi-State Plan (MSP) Program prepares for Plan Year 2018, we continue to execute our vision of collaboration and innovation to ensure that all Marketplace consumers have access to distinctive health insurance options. To that end, we have taken significant steps to simplify our processes and enhance the security of our web-based portal. This annual letter outlines our initiatives for Plan Year 2018 as we work to implement our mission of serving Marketplace consumers.

FLEXIBILITY IN PARTNERSHIPS

Our staff has spent several years working closely with health insurance issuers, Marketplaces, and regulators. These relationships enable OPM to provide issuers and applicants with timely assistance in navigating State and Federal regulatory requirements.

As described in the MSP Program Annual Letter for Plan Year 2017,¹ participation in the MSP Program is not limited to entities that are able to operate nationwide. While nationwide availability of MSP options is a goal of the Program, issuers that cannot commit to expanding coverage to all states over four years are nevertheless encouraged to submit an application to the Program.

OPM also encourages issuers who are considering partnerships with other entities to contact us for information about participation requirements for the MSP Program.

OPM is the certifying entity for MSP Issuers and options. An issuer does not need to be certified as a QHP issuer to participate in the MSP Program and may choose to satisfy the Marketplace requirement to offer at least one silver and one gold plan by offering only MSP options.² Issuers interested in taking this approach to Marketplace offerings should submit an application to OPM for review and consideration for approval. On behalf of the issuer, we will transfer OPM-certified MSP options directly to the appropriate Marketplace. We work closely with the Marketplaces to ensure data transfer on a timely basis.

¹ MSP Program Issuer Letter, 2016-001, "Multi-State Plan Program Annual Letter for Plan Year 2017." Published January 13, 2016. <https://www.opm.gov/media/5206258/multi-state-plan-program-plan-year-2017-annual-letter-.pdf>.

² HHS Notice of Benefit and Payment Parameters for 2018, <https://www.federalregister.gov/documents/2016/09/06/2016-20896/patient-protection-and-affordable-care-act-hhs-notice-of-benefit-and-payment-parameters-for-2018>.

WEB-BASED ISSUER PORTAL

OPM continues to enhance its comprehensive web-based MSP Portal, designed and developed specifically for the MSP Program, to streamline the application, contract management, and external review processes for issuers. This paperless system includes features to facilitate collaboration, improve quality assurance, enable comprehensive record keeping, and ensure security. The MSP Portal serves as the official system of record for the MSP Program.

In 2017, MSP Issuers will also use the MSP Portal to communicate with OPM about enrollee requests for external review and to archive those communications. This will allow MSP Issuers to provide requested information and receive case updates, including the final appeal decision, through the Portal.

Communication tools throughout the MSP Portal allow MSP Issuers to consult with experienced OPM Subject Matter Experts, both during the application process and while participating as an MSP Issuer. These tools promote the quick, direct exchange of information to support issuer and Program needs.

Moreover, OPM recognized the complexity in preparing plan proposals for Marketplace certification and constructed template preview tools within the MSP Portal. These tools allow issuers to review and correct data prior to submission. In addition, the MSP Portal connects to the Centers for Medicare & Medicaid Services (CMS) Data Services Hub, thus allowing issuers to test the validity of template data in real time. OPM will continue to build quality assurance tools in the MSP Portal to assist issuers.

STREAMLINED CONTRACT

For Plan Year 2017, OPM worked with existing MSP Issuers to streamline the MSP standard contract. These efforts improved the contract's clarity and relevance. Consequently, the annual contract negotiation process will be less time-consuming for MSP Issuers and new applicants, and the clearer contract language will facilitate compliance.

CHANGE IN MULTI-STATE PLAN OPTION NAMING GUIDELINES

We are modifying the guidance that requires MSP Issuers to add the phrase “, a Multi-State Plan” to all MSP option plan marketing names. We recognize the consumer confusion around this naming requirement, especially when an MSP option does not generally cover services provided out-of-state. Therefore, we are giving MSP State-level Issuers the choice to either include or omit the phrase “, a Multi-State Plan”, in the plan marketing name of their MSP options. This phrase is the only Multi-State Plan identifier approved for use in plan marketing names, but its use is now optional. However, an MSP State-level Issuer that chooses to omit “, a Multi-State Plan” must ensure that the plan marketing names it uses for its MSP options are different from the plan marketing names it uses for its other plans.

All other previously issued guidance regarding plan marketing names remains in force, including that related to the common use of a service mark.

CONCLUSION

There is no official public comment period for this letter. If you have any questions about this letter, please address them to MSPPIssuer@opm.gov. Previous annual letters and other guidance issued by OPM for the MSP Program may be found on our website at: www.opm.gov/healthcare-insurance/multi-state-plan-program.

Sincerely,



Alan P. Spielman
Director
Healthcare and Insurance