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To Contract or Not to Contract?

QHP Relations from an IHS Perspective

Presentation Overview

- ◊ The Health Insurance Marketplace
- ◊ Qualified Health Plans
- ◊ Essential Health Benefits
- ◊ Essential Community Providers
- ◊ Potential Benefits of Contracting
- ◊ QHP Addendum for I/T/U
- ◊ Other Considerations & Lessons Learned
- ◊ The Arizona Experience
- ◊ Marketplace Timeline
- ◊ Resources

Health Insurance Marketplace

- o **Health Insurance Marketplace** (State, Federal, or Partnership)

- o Enrollment begins October 1, 2013; Ends March 31, 2014
- o Coverage begins January 1, 2014

- o **Individuals & Families**

- o Individuals with incomes up to 400% FPL may be eligible for an advance premium tax credit (around \$94,200 for a family of 4)
- o AI/AN with income up to 300% FPL are exempt from copays, coinsurance, deductibles (around \$70,650 for a family of 4); still have to pay premiums
- o AI/AN have special monthly enrollment periods
- o Tribes may elect to pay for their members' premiums

- o **Small Businesses**

- o In 2014, 50 or fewer FTE; In 2016, 100 or fewer FTE

- o **NOTE:** Shared Responsibility Payment – Hardship exemption for AI/AN eligible for services at I/T/U

Qualified Health Plans

- Coverage Starts January 1, 2014
- Insurance plans are certified by the Health Insurance Marketplace in which it is sold
 - Federally Facilitated Marketplace (Ex: Arizona)
 - State-Based Marketplaces (Ex: Nevada, California, New Mexico)
 - Partnership Marketplaces (Ex: Utah)
- Provide Essential Health Benefits
- Follow established limits on cost-sharing

Essential Health Benefits

- **Essential Health Benefits:** Beginning in 2014, most health plans will need to meet a state-determined benchmark of benefits.
 - Ambulatory patient services
 - Emergency services
 - Hospitalization
 - Maternity and newborn care
 - Mental health and substance use disorder services including behavioral health treatment
 - Prescription drugs
 - Rehabilitative and Habilitative services and devices
 - Laboratory services
 - Preventive and wellness services and chronic disease management
 - Pediatric services, including oral and vision care
- **Exceptions:** Self-insured health plans, large-group market, grandfathered health plans

Essential Community Providers

- QHPs must include in their network a sufficient number and geographic distribution of providers that serve predominately low-income, medically underserved individuals

- ECPs include I/T/U providers!!!

- Non-Exhaustive List of ECPs:

- <https://data.cms.gov/dataset/Non-Exhaustive-List-of-Essential-Community-Providers/ibqy-mswq>

Data.CMS.gov

[Home](#) | [Create an Account](#) | [Sign In to Data.CMS.Gov](#)

Unsaved View

Save As...

Revert

Based on Non-Exhaustive List of Essential Community Providers - ECPs

Non-exhaustive List of Essential Community Providers (ECPs)

Manage

More Views

Filter

Visualize

Export

Discuss

Embed

About

arizona

Organization Name	Street Address	City	State	Zip Code	County Name
1 CHIRICAHUA COMMUNITY HEALTH CENTERS	108 ARIZONA ST	BISBEE	AZ	85603	COCHISE
2 SOUTHEAST ARIZONA MEDICAL CENTER	2174 WEST OAK AVENUE	DOUGLAS	AZ	85607	COCHISE
3 Planned Parenthood Arizona, Inc.	1304 S. Plaza Way	Flagstaff	AZ	86001	COCONINO
4 Planned Parenthood Arizona	1235 S Gilbert	Gilbert	AZ	85204	MARICOPA
5 Arizona State University	1124 N. 3rd	Phoenix	AZ	85004	MARICOPA
6 Arizona State University	500 N. 3rd St. Mail Code 3020	Phoenix	AZ	85004	MARICOPA
7 Inter-Tribal Council of Arizona	2214 N. Central Avenue Suite 100	Phoenix	AZ	85004	MARICOPA
8 MARICOPA COUNTY - ARIZONA	234 N. CENTRAL AVENUE	PHOENIX	AZ	85004	MARICOPA
9 ARIZONA DEPARTMENT OF HEALTH SERVICES	150 N. 18TH AVENUE	PHOENIX	AZ	85007	MARICOPA
10 Arizona Family Planning Council	3101 N CENTRAL AVENUE Suite 1120	Phoenix	AZ	85012	MARICOPA
11 Planned Parenthood of Arizona	5651 N 7th	Phoenix	AZ	85014	MARICOPA
12 Planned Parenthood Arizona	4616 51st Suite No. 208	Phoenix	AZ	85031	MARICOPA
13 Planned Parenthood Arizona, Inc.	610 N. Alma School Rd., Suite 48	Chandler	AZ	85224	MARICOPA
14 Planned Parenthood Arizona, Inc.	5771 W. Eugie	Glendale	AZ	85304	MARICOPA
15 Planned Parenthood Arizona, Inc.	5651 N. 7th St.	Phoenix	AZ	85014	MARICOPA
16 Planned Parenthood Arizona, Inc.	3131 E. Thunderbird Rd., Suite 48	Phoenix	AZ	85032	MARICOPA
17 Planned Parenthood Arizona, Inc.	7901 E. Thomas Rd., Suite 106	Scottsdale	AZ	85251	MARICOPA
18 Planned Parenthood Arizona, Inc.	1250 E. Apache Blvd., Suite 108	Tempe	AZ	85281	MARICOPA
19 WESTERN ARIZONA REGIONAL MEDICAL CTR	2735 SILVER CREEK ROAD	BULLHEAD CITY	AZ	86442	MOHAVE
20 THE UNIVERSITY OF ARIZONA MEDICAL CTR- SOUTH C	2800 EAST AJO WAY	TUCSON	AZ	85713	PIMA
21 Southern Arizona AIDS Foundation	375 South Euclid	Tucson	AZ	85719	PIMA
22 ARIZONA BOARD OF REGENTS, THE UNIVERSITY OF A	1501 N. Campbell Ave.	Tucson	AZ	85724	PIMA
23 Planned Parenthood Arizona, Inc.	2255 N. Wyatt Dr.	Tucson	AZ	85712	PIMA
24 SUN LIFE FAMILY HEALTH CENTER	1284 N. ARIZONA BLVD	COOLIDGE	AZ	85228	PINAL
25 Planned Parenthood Arizona, Inc.	7750 E Florentine Rd	Prescott Valley	AZ	86314	YAVAPAI
26 Planned Parenthood Arizona	1455 16th	Yuma	AZ	85364	YUMA

CMS & HHS Websites

[Medicare.gov](#) | [MyMedicare.gov](#) | [StopMedicareFraud.gov](#) | [Medicaid.gov](#) | [InsureKidsNow.gov](#) | [HealthCare.gov](#) | [HHS.gov/Open](#)

Helpful Links

[Web Policies & Important Links](#) | [Privacy Policy](#) | [Freedom of Information Act](#) | [No Fear Act](#) | [HHS.gov](#) | [Inspector General](#) | [USA.gov](#) | [Plain Language](#)

Potential Benefits of Contracting

- Indian Health Care Providers may benefit from contracting with QHPs
 - Provides access to services which we do not provide
 - Increasing access to health care services
 - Leaving dollars to those who need it most
 - Care Coordination and other Care Management initiatives, which may improve health outcomes
 - Timely Reimbursement

QHP Addendum for I/T/U

- QHP I/T/U Addendum

- <http://cciio.cms.gov/programs/exchanges/qhp.html>

- Key Provisions

- Persons Eligible

- Applicability of Other Federal Laws

- Non-Taxable Entity

- Insurance and Indemnification

- Licensure of Health Care Professionals

- Licensure of Provider; Eligibility for Payments

- Dispute Resolution

QHP Addendum for I/T/U (cont.)

- Key Provisions (cont.)

- Governing Law
- Medical Quality Assurance Requirements
- Claims Format
- Payment of Claims
- Hours and Days of Service
- CHS Referral Requirements
- Sovereign Immunity
- Endorsement

Other Considerations

- ◊ Reimbursement Rates
- ◊ Signature Authority
- ◊ Credentialing
- ◊ Facility vs. Provider Agreement
- ◊ Timely Filing & Claims Submission Requirements
- ◊ Electronic Funds Transfer & Electronic Remittance Advices
- ◊ Training Requirements
- ◊ Who Signs First
- ◊ Tracking of Contracts & Provide Training to Staff
- ◊ Other Requirements

The Arizona Experience

- Existing Contracts with Non-QHPs
 - Navajo Area – Area-wide Contracts
 - NM Medicaid Managed Care Plans (Salud and CoLTS)
 - Blue Cross Blue Shield of AZ and NM
 - United Healthcare
 - Phoenix Area
 - Blue Cross Blue Shield of AZ (some facilities)
 - Aetna and potentially others
 - Tucson Area – Area-wide Contract
 - Blue Cross Blue Shield of AZ
 - Commercial, Senior, and FEHB Plans

The Arizona Experience

- Dialogue with Commercial Insurers
 - Discussion of Considerations & Draft I/T/U Addendum (Late 2012)
 - Facilitation by Arizona Medicaid Director
 - Presentation to Commercial Insurers (Early 2013)
- Arizona Tribal Health Insurance Marketplace Workgroup
 - Initial Movement toward State-Based Marketplace (2012)
 - Collaboration with the Governor's Office and Dept. of Insurance
 - State decided to defer to the federal government (Late 2012)
 - Collaboration with the HHS Regional Director
- Insurers Seeking Certification as Qualified Health Plans (Mid-2013)
 - I/T/U listed as Essential Community Providers

The Arizona Experience

- QHP Relations & Contracting
 - Coordination at the Area Office Level
 - Coordination among 3 Area Offices
 - Work with Office of General Counsel (Region IX)
 - QHP Addendum for I/T/U
 - Some Insurers may refuse to accept the QHP Addendum in part or in whole
 - When approved...consider signing or begin negotiations
 - When signed....
 - Tracking
 - Orientation

Marketplace Timeline

	FEB 2013	MAR 2013	APR 2013	MAY 2013	JUN 2013	JUL 2013	AUG 2013	SEP 2013	OCT 2013
<u>Policy</u>	<u>2/2013</u> Essential Health Benefits & Market Rules, Payment Notice	<u>3/2013</u> Medicaid FMAP Rule	<u>4/2013</u> Eligibility Rule (Marketplace & Medicaid/CHIP Appeals						
<u>Operations & IT</u>	<u>2/2013</u> Income Definition Business Rules Finalized		<u>4/2013</u> Issuers Submit QHP Rating & Benefit Data for HHS Marketplace			<u>7/2013</u> Final QHP Evaluation Results Recd. & Data Finalized	<u>8/2013</u> QHP Plan Preview for HHS & Partner Marketplaces	<u>9/2013</u> IT Dev. & Integration Testing Complete	
<u>Issuers & States</u>	<u>2/2013</u> State Partnership Marketplace Blueprints Due	<u>3/2013</u> Secretary Final Decisions for Marketplaces				<u>7/2013</u> State Dept. of Insurance Approval of QHPs, State Partnership Review of QHPs Complete			
		<u>3/2013</u> Issuer QHP Plan Designs Complete							
<u>Consumer Assistance</u>			<u>4/2013</u> Single Streamlined Application Finalized		<u>6/2013</u> Web Re-Launch & Call Center Launch	<u>7/2013</u> Navigator Portal Available	<u>8/2013</u> Navigator/ Agent/Broker Training Complete		<u>10/2013</u> ENROLLMENT BEGINS

Resources

- Healthcare.gov – <https://www.healthcare.gov/>
- CMS CCIIO – <http://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/index.html>
- Tribalhealthcare.org – <http://tribalhealthcare.org/>
- IHS.gov – Coming Soon

Questions?

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