Speed to Market Tools for Large Group Health, Dental Only, or Vision Only Plan Rate Filings

**Purpose:** Speed to Market (STM) Tools provide guidance for preparing a filing. Although following this guidance does not guarantee that your filing will be approved, it will expedite the review process by avoiding common mistakes that result in objections.

# Who should use this document?

**Applicable Licenses:** HCSCs, HMOs and Disability Issuers.

**Applicable TOIs:** H10G, H16G, H20G, and HOrg02G.

**Other Information:**

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# How to use this document:

1. **The STM Tool guidance and other documents are highly recommended for carriers seeking the fastest path to a positive final action in their filing.**
2. The information in this document is intended to help carriers increase filing efficiency by reducing the number of objections they receive in their filings.
3. STM Tool guidance in this document includes sections for the different filing methodologies applicable to large group health, dental only, and vision only filings. The guidance addresses **what** information is needed, **how** to present the information, and **where** to load the information or documents in the SERFF filing.
	1. The type of filing method is identified at the beginning of the section.
	2. **“What** information is needed” is either stated in this document or in a standardized document (e.g., checklist) referenced in the guidance below.
	3. **“How** to present the information” refers to when a standardized checklist, format, or other document is available (if applicable). These documents will be explicitly referenced below, with instructions on how to find them.
	4. **“Where** to load the information or documents in the SERFF filing” is explained below.

# Speed to Market Instructions Large Group Health, Dental Only, and Vision Only Plan Rate Filings

## General Information

### **Filing options:** Note, carriers can choose to use any combination of the filing methodologies documented below (**Rate Manual** rate filing, **Multiple Large Group Negotiated** rate filing, or **Single Large Group Negotiated** rate filing) for their large group line of business. For example, to file all its large group line of business rate filings, a carrier can choose to mainly utilize the filing option of **Multiple Large Group Negotiated** rate filing and use the filing option of **Single Large Group Negotiated** rate filing for some unique groups.

### **Recommendation:** We recommend that issuers primarily use the **Rate Manual** rate filing methodology (Section II) or the **Multiple Large Group Negotiated** rate filing methodology (Section III.B) to file large group rates. Then, use the **Single Large Group Negotiated** rate filing methodology as needed to supplement those two filing methodologies (Section III.C). This will significantly reduce the number of rate filings and work required for the issuers and the OIC.

##### A **Rate Manual** rate filing is used to file a rate manual that includes all the information needed to calculate the premium rates for different groups (see Section II).

#### A **Multiple Large Group Negotiated** rate filing includes the exact premium rates charged for multiple groups with a common effective date (see Section III.B).

#### A **Single Large Group Negotiated** rate filing include the exact premium rates charged for one group (Section III.C).

## Large group rate filings submitted under RCW 48.43.733(1) and WAC 284-43-6560(1): Large group rates that are not negotiated and are filed before the rate schedule is used.

### Scope and applicability of this subsection:

##### Applies to filings for **non-association** groups (association filings are covered in another section):

###### Large group health plans,

###### Large group dental only plans, and

###### Large group vision only plans.

##### **Corresponding form filing information:** This section applies only to rate filings that correspond to a standard master contract form filing.

##### For more information regarding form filings, see the Washington State SERFF Health and Disability Form Filing General Instructions provided on SERFF and the WA [OIC website](https://www.insurance.wa.gov/filing-instructions).

#### **Description of rate filing:** This type of rate filing is used to file a rate manual that includes all the information needed to calculate the premium rates for different groups.

### **STM – Rate Manual Rate Filing Information**

#### Corresponding SERFF Product Name: “Large Group Rate Manual – [Rate Manual Identifier] – [[For-Public] or [Not-for-Public]].”

#### For rate manual guidance, see the *STM - Rates – Health Dental Vision - Large Group Rate Manual Guidance* document (provided on the [OIC website](https://www.insurance.wa.gov/filing-instructions)).

#### Attach a completed Filing Summary for WAC 284-43-6540 using the *Format - Rates - WAC 284-43-6540 Summary Duplicate* document (provided on the [OIC website](https://www.insurance.wa.gov/filing-instructions)).

## Large group negotiated rate filings submitted under RCW 48.43.733(2) and WAC 284-43-6560(2):

### Scope and applicability of this subsection:

#### Applies to rate filings for **non-association** groups (association filings are covered in another section):

##### Large group health plans,

##### Large group dental only plans,

##### Large group vision only plans, and

##### Similar types of plans for Taft-Hartley groups.

#### **Corresponding form filing information:** This section can be applied to rate filings for all types of form filings for the types of coverage and groups stated above (Standard Master Contracts, Shortform, and Fully Negotiated).

##### For more information regarding form filings, see Washington State SERFF Health and Disability Form Filing General Instructions provided on SERFF and the WA [OIC website](https://www.insurance.wa.gov/filing-instructions).

### **STM –** **Multiple Large Group Negotiated Rate Filing Information**

#### **Recommended use:** We recommend issuers use the filing methodology defined in this section to file negotiated rates for multiple groups in one rate filing **on a monthly basis corresponding to the effective date of the rates**. Then use the single group instructions in section III.C as needed to supplement the monthly rate filing (e.g., when a group was not included in the multiple group rate filing by mistake). Following this recommendation should dramatically reduce the number of rate filings required. Please contact us if you have questions.

##### You **cannot** submit a Multiple Large Group Negotiated Rate Filing if any of the following applies to your submission:

###### The Filing is submitted late.

###### The Carrier is excluding certain mandated benefits.

###### The Carrier is adding a new group with Implementation Credits.

###### The Carrier is filing a group contract with Performance Standards.

###### The Carrier is filing vision only or dental only plans for an Association.

#### **Description of rate filing:** This rate filing methodology is used to file multiple large groups’ negotiated rates in a for-public and not-for-public rate filing.

##### This filing process is intended for filing negotiated rates on a monthly basis regardless of the type of form filing used.

##### All rates included in the filing must have the same effective date.

##### The group information and rate schedules for all groups accounted for in the filing are summarized in a template (see STM - Rates - Multiple Large Group Negotiated Rate Filing Template referenced below).

#### **When a rate filing is required:**

##### Negotiated contract forms and rates schedules must be filed within thirty working days after the earlier of the date group contract negotiations are completed or the date renewal premiums are implemented. [RCW 48.43.733(2)]

###### If the date group contract negotiations were completed is unknown, the effective date (or implementation date) of the rate schedule should be used.

##### If the negotiated contract form and rate schedule were filed for the previous contract period and the rate schedule is not changing upon renewal, is a new rate filing required?

###### If neither the negotiated contract form nor the rates change upon renewal, a new rate filing is not required.

###### If the negotiated contract form changes for reasons other than changes in State or Federal law but the rate schedule does not change, a new rate filing is required.

#### Under the General Information tab in SERFF:

##### Corresponding SERFF Product Naming Convention: “Multiple Large Group Negotiated Rate Filing – New and Renewing [Rates Effective Date] – [[For-Public] or [Not-for-Public]]”

##### In the Implementation Date Requested field, state the effective date of the rates. **All rates in the filing must have the same effective date.**

###### This should match the effective date stated in the STM - Rates - Multiple Large Group Negotiated Rate Filing Template attached under the Rate/Rule Schedule tab.

##### In the Corresponding Filing Tracking Number field, indicate all applicable SERFF Tracking Numbers for the corresponding rate filings (i.e., the for-public or not-for-public rate filing).

###### Note, form filing SERFF trackers, if available at the time of submission, will be provided in the Format - Rates - WAC 284-43-6540 Summary Duplicate filing summary. Instructions are included in the document.

#### Under the Rate/Rule Schedule tab in SERFF:

##### Attach a completed Multiple Large Group Negotiated Rate Filing Template in the for-public rate filing.

###### Use the file named STM - Rates - Negotiated - Multiple Large Group Filing Template (provided on the [OIC website](https://www.insurance.wa.gov/filing-instructions)).

This document includes a template for providing group information and the rate schedules. Instructions and illustrative examples are included in the file.

###### Before submitting in SERFF, remove the instructions and example worksheets provided in the document.

###### Provide the STM - Rates - Multiple Large Group Negotiated Rate Filing Template document in both PDF and Excel format.

Ensure the PDF and Excel files show all the content in the “Group Info Summary” and “Rate Schedules” sheets.

Name the PDF document “Negotiated Rate Filing - Multiple Large Groups Filing Template.pdf.”

Name the Excel document “Negotiated Rate Filing - Multiple Large Groups Filing Template Duplicate.xlsx.”

##### List the rate action as “revised” for filings that include renewal groups and “new” for filings with only new groups.

#### Under the Supporting Documentation tab in SERFF:

##### Attach a completed Filing Summary for WAC 284-43-6540 in PDF format.

###### Use the *Format - Rates - WAC 284-43-6540 Summary Duplicate* document (provided on the WA [OIC website](https://www.insurance.wa.gov/filing-instructions)).

###### Complete one or more WAC 284-43-6540 summaries so the filing includes information about all groups accounted for in the rate filing.

If you choose to complete one WAC 284-43-6540 summary for all groups in the filing, in the WAC 284-43-6540:

Check the Multiemployer other than Association/Trust Groups box.

In the Group Pool Name field, state “Multiple Large Group Negotiated Rates – New and Renewing [Rates Effective Date].”

Replace [Rates Effective Date] with the common effective date.

Type of filing check boxes: If the groups are all new groups, select the New Group Contract checkbox. Otherwise, check the Revision of Existing Group Contract checkbox.

Leave the Rate Summary section blank, and in the comments field at the bottom of the document state, “See the separate rate schedule summary for rate change information.”

Summary of Contract Experience section: Include the experience of all large groups accounted for in the rate filing. If all of the groups are new groups, enter “N/A” in the applicable experience periods for periods where applicable.

Comments and additional information field: Enter any other explanatory information as needed.

If you do not choose to complete one WAC 284-43-6540 summary for all groups in the filing, then complete one WAC 284-43-6540 summary for each group accounted for in the rate filing. In each of the WAC 284-43-6540:

Check the Single Employer Group box.

In the Employer Name field, state the employer’s name.

Summary of Contract Experience section: Include the experience of the group accounted for in the rate filing. If the group is a new group, enter “N/A” in the applicable experience periods for periods where applicable.

Comments and additional information field: Enter any explanatory information as needed.

### **STM – Single Large Group Negotiated Rate filing information**

#### **Recommended use:** We recommend issuers primarily use the filing methodology defined in section III.B to file negotiated rates for multiple groups in one rate filing and use the instructions in section III.C as needed to supplement that rate filing (e.g., when a group was not included in the multiple group rate filing). Following this recommendation should dramatically reduce the number of rate filings required. Please contact us if you have questions.

##### Single Large Group Negotiated Rate Filing is the **only** way to submit filings if any of the following are applicable:

###### The Filing is submitted late.

###### The Carrier is excluding certain mandated benefits.

###### The Carrier is adding a new group with Implementation Credits.

###### The Carrier is filing a group contract with Performance Standards.

#### **Description of rate filing:** This rate filing methodology is used to file negotiated rates for one large group in a for-public and not-for-public rate filing. This filing process is intended to supplement multiple large group negotiated rate filings that are submitted on a monthly basis.

#### Corresponding SERFF Product Naming Convention: In the SERFF Product Name field naming conventions: “Large Group Negotiated Rate Filing – [Group Name] – [[For-Public] or [Not-for-Public]].”

#### Under the Rate/Rule Schedule tab in SERFF:

##### Attach a completed PDF copy of the Rate Schedule Item in the for-public rate filing.

###### Use the Rate Schedule Item document (provided on the [OIC website](https://www.insurance.wa.gov/filing-instructions))*.*

###### Name the file “Rate Schedule Item.pdf.”

##### Attach a complete rate schedule.

###### Attach this document in PDF file format.

#### Under the Supporting Documentation tab in SERFF:

##### Attach a completed Filing Summary for WAC 284-43-6540 in PDF format.

###### Use the *Format - Rates - WAC 284-43-6540 Summary Duplicate* document (provided on the [OIC website](https://www.insurance.wa.gov/filing-instructions)).

Complete the WAC 284-43-6540 summary so it includes information for the group accounted in the rate filing.

## Dental only or vision only plans rate filings for associations

### Scope and applicability of this subsection:

#### Applies to filings for:

##### Large group **association** dental only plans;

##### Large group **association** vision only plans;

### STM – Rate filing information

#### Corresponding SERFF Product Naming Conventions

##### “Association [[Dental Only] or [Vision Only]] Rate Filing – [Group Name] – [[For-Public] or [Not-for-Public]]”

#### Under the Rate/Rule Schedule tab in SERFF:

##### Attach a completed Rate Schedule Item for the group.

###### Use the Rate Schedule Item document (provided on the [OIC website](https://www.insurance.wa.gov/filing-instructions))*.*

###### Complete the Rate Schedule Item using the association information.

###### Name the file “Rate Schedule Item.pdf.”

#### Under the Supporting Documentation tab, attach a completed Filing Summary for WAC 284-43-6540 in PDF format.

###### Use the *Format - Rates - WAC 284-43-6540 Summary Duplicate* document (provided on the [OIC website](https://www.insurance.wa.gov/filing-instructions)).

###### Per Subchapter I of WAC 284-43 (in particular WAC 284-43-6100), all small group dental only plans must be pooled together for rating purposes, and the requirement is the same for all small group vision only plans. If an association includes subgroups of sizes less than 51, the carrier must provide support that the association is a large group so that those subgroups with size less than 51 within the association are not required to be pooled with the small group pool for rating purposes. Please note that one way to prove that the association is a large group is to provide the documentation that the association meets the definition of Pathway 1 Association per WAC 284-43-8110.

## Pathway 1 association health plan rate filings

### STM – Rate filing information

#### Corresponding SERFF Product Naming Conventions

##### “Pathway 1 Association or group under 29 U.S.C. Section 1002(5) of ERISA – [Name of the Association] – [[For-Public] or [Not-for-Public]].”

#### On the Supporting Documentation tab in SERFF

##### Attach a completed Filing Summary for WAC 284-43-6540.

###### Use the *Format - Rates - WAC 284-43-6540 Summary Duplicate* document (provided on the [OIC website](https://www.insurance.wa.gov/filing-instructions)).

##### Include a certification of the public rate filing from an officer of the company certifying that the group health insurance coverage in connection with this large group health plan meets the requirements of Health Insurance Portability and Accountability Act (HIPAA) (29 CFR Chapter XXV, Section 2590.702) which prohibits discrimination against participants and beneficiaries based on a health status-related factor. The certification must include statements that the rules for the eligibility (including continued eligibility) of any individual to enroll under the terms of the large group health plan are not based on any of the following health status-related factors (prescribed in HIPAA) in relation to the individual or a dependent of the individual:

###### Health status.

###### Medical condition (including both physical and mental illnesses).

###### Claims experience.

###### Receipt of health care.

###### Medical history.

###### Genetic information.

###### Evidence of insurability (including conditions arising out of acts of domestic violence).

###### Disability.

##### Submit one PDF document “Monthly Enrollment Report” to include the monthly enrollment from the most recent 12 month experience. You must file this document in the public rate filing. If this is a new association, you may indicate in the “Monthly Enrollment Report” the association is new and there is no enrollment to report.

# Contact Us

### For filing related questions, contact the Rates, Forms, and Provider Networks (RFPN) Help Desk:

(360) 725-7111

rfhelpdesk@oic.wa.gov

### For feedback or suggestions, email us:

RFHealthplan@oic.wa.gov