



**The State of New Hampshire  
Insurance Department**  
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**New Hampshire Insurance Department (NHID)**  
**Answers to Plan Management Marketplace Questions**  
**(in response to BULLETIN No. INS 13-005-AB)**  
**May 1, 2013**

Below please find answers to questions submitted in response to Bulletin No. INS 13-005-AB "The NH Insurance Department's Plans for Implementing the State Plan Management Partnership."

Please note that Bulletin No. INS-13-007-AB "New Hampshire Qualified Health Plan Certification Bulletin to Issuers- 2014 Plan Year" did address some of these questions, and contains additional guidelines.

**1 – Does New Hampshire limit the number of plan designs sold on the Health Insurance Exchange (to be known as the NH Marketplace)?**

Answer:

The New Hampshire Insurance Department is not limiting the number of plan designs by a carrier selling products in the NH Marketplace; however, under the Affordable Care Act (ACA) there must be meaningful differences between a carrier's plan offerings.

Multiple plans can be submitted in one binder.

**2 - Can plans be submitted with variability?**

Answer: No

Variable language is NOT allowed.

**3 - Can in-force plans be updated to add Essential Health Benefits (EHB) by rider/endorsement?**

Answer:

No, to be considered for recommendation by the Department as a Qualified Health Plan (QHP) a new filing representative of the product is required.

**4 - Does New Hampshire require pre-2014 non-grandfathered plans to be discontinued and rolled to a new 2014 plan?**

Answer:

Pre-2014 non-grandfathered plans can remain in force until the renewal date, at which time the policyholder may purchase a QHP plan offered in the NH Marketplace, or other ACA compliant coverage offered outside the Marketplace.

**5- What is the New Hampshire due date to file plans?**

Answer:

Filings are already being accepted at the Department. Checklists may be found on SERFF and our website at [www.nh.gov/ins](http://www.nh.gov/ins) for individual and small group health policies. A Stand Alone Dental checklist was posted on Tuesday April 30<sup>th</sup> with a Large Group Checklist expected to be available the following week.

The deadline to file products on the Marketplace is June 1, 2013. Filings will be prioritized by whether or not the products are to be offered in the Marketplace followed by the order filings are received by the Department on a first come, first reviewed basis.

Please see BULLETIN No. INS-13-007-AB for more details:

[http://www.nh.gov/insurance/media/bulletins/documents/ins\\_13\\_007\\_ab.pdf](http://www.nh.gov/insurance/media/bulletins/documents/ins_13_007_ab.pdf)

**6- What is New Hampshire's due date to file rates for EHB plans?**

Answer:

Rate filings must be submitted simultaneously with plans, and may not be submitted later than June 1, 2013. Please see BULLETIN No. INS-13-007-AB for more details:

[http://www.nh.gov/insurance/media/bulletins/documents/ins\\_13\\_007\\_ab.pdf](http://www.nh.gov/insurance/media/bulletins/documents/ins_13_007_ab.pdf)

**7- What templates, if any, will we be required to submit for form and rate filings when the plan will be offered outside of the NH Marketplace only?**

Answer:

NH is requiring carriers to complete QHP templates for all individual and small group products offered either in or out of the NH Marketplace. Each insurer should submit no more than one binder per market – one binder for individual and one binder for SHOP products, whether for offering in the NH Marketplace or not. Please refer to SERFF Plan Management Instructions: <https://login.serff.com/serff/viewStatePlanInstructions>

**8- Will New Hampshire be holding a webinar or teleconference regarding the filing process for EHB/QHP form and rate filings in the state?**

Answer:

Teleconferences or Department meetings will be arranged upon request. Please contact Michael Wilkey, Director of Compliance and Consumer Services at the New Hampshire Insurance Department, [michael.wilkey@ins.nh.gov](mailto:michael.wilkey@ins.nh.gov) or 603-271-2261 ext. 330.

**9- Will New Hampshire update form and rate filing checklists to include EHB/QHP requirements? If so, when will these checklists be available on your website?**

Answer:

Yes, all checklists are or will be posted on <http://www.nh.gov/insurance/lah/index.htm> as soon as they are finalized. Currently posted are Individual, Small Group and Stand Alone Dental. Please check our website frequently to make sure you are using the latest checklists.

**10- Can you provide me with New Hampshire's intent with regards to producers and the New Hampshire Marketplace?**

Answer:

New Hampshire supports producer involvement in all aspects of the NH Marketplace, and as guidance becomes available from CCIIO we will promptly post it on our website. In particular, please see Bulletin No. INS-13-009-AB “Producer Role in Assisting Consumers Using the Exchange/Marketplace” issued on April 26, 2013:

[http://www.nh.gov/insurance/media/bulletins/documents/ins\\_13-009-ab.pdf](http://www.nh.gov/insurance/media/bulletins/documents/ins_13-009-ab.pdf)

**11 – As stated in the March 1, 2013 letter to issuers as provided in C.F.R. Section 156.130(b)(3), does federal guidance allow a health plan to exceed the \$2,000/\$4,000 deductible limit set for small group plans, provided the plan design is considered reasonable and customary in the small group market?**

Answer:

It is our understanding that reasonableness will be determined based on a comparison of all plans submitted nationally. We are currently seeking clarification on this issue from CCIIO.

**12- What is the deadline for filing stand-alone dental plans to be sold on the Marketplace?**

Answer:

June 1, 2013

**13- If an insurer wants to offer a NH Marketplace certified stand-alone dental plan outside the New Hampshire Marketplace, are you requiring the form filing to be submitted by June 1, 2013?**

Answer:

Yes, All plans for which certification is sought must be submitted by June 1, 2013.

**14- If an insurer wants to offer a traditional dental only policy that is not NH Marketplace certified after January 1, 2014 are there any filing deadlines?**

Answer:

No. Please see BULLETIN No. INS-13-007-AB.

**15- Are stand-alone vision plans permitted in the NH Marketplace?**

Answer:

No, in accordance with CCIIO guidelines, stand-alone vision is not permitted.