

Section 1332 of the Patient Protection and Affordable Care Act (PPACA) State Innovation Waivers – Reinsurance Waiver Quarterly Report

Reporting Instructions: Use the following template to capture data for quarterly 1332 waiver grant reporting, as specified in 45 CFR 155.1324(a), and referenced in your grant specific terms and conditions (STC). Quarterly reports are due 60 days following the end of each calendar quarter.

STATE:

A. GRANTEE INFORMATION			
1. Reporting Period End Date June 30, 2020		2. Report Due Date November 30, 2020	
3. 1st Quarterly Report <input type="radio"/>	2nd Quarterly Report <input type="radio"/>	3rd Quarterly Report <input checked="" type="radio"/>	4. Federal Agency and Organization Element to Which Report is Submitted Consumer Information & Insurance Oversight (CCIIO)
5. Federal Grant Number Assigned by Federal Agency SIWIW190008	6a. DUNS Number 155915090000		6b. EIN 396006451
7. Recipient Organization Name Wisconsin Office of the Commissioner of Insurance			
Address Line 1 125 South Webster Street			
Address Line 2			
Address Line 3			
City Madison	State WI		Zip Code 53707
Zip Extension		8. Grant Period Start Date January 1, 2019	
9. Grant Period End Date December 31, 2023			
10. Other Attachments (attach other documents as needed or as instructed by the awarding Federal agency)			

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B. REPORT CERTIFICATION	
11. Certification: I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.	
11a. Typed or printed name and title of Authorized Certifying Official Nathan Houdek Deputy Commissioner	11b. Signature of Authorized Certifying Official
11c. Telephone (area code, number, and extension) 608-266-2493	11d. E-mail address Nathan.Houdek@wisconsin.gov
11e. Date report submitted (month/day/year)	
C. PROGRESS OF SECTION 1332 WAIVER - General	
12. Provide an update on progress made in implementing and/or operating the approved 1332 waiver.	
<p>*July 15, 2020: Phase I of the audit process continues. As a reminder, in June, OCI identified a subset of 58 WIHSP claims across all insurers and asked insurers to submit the list of individual claims that rolled up to the final enrollee claim amount. That list of claims data was due to OCI on July 15, 2020.</p> <p>*July 24, 2020: OCI completed review of the claims data for the Phase I audit. Items reviewed included: submission of the OCI data attestation form; submission of the confirmation page from the Attestation and Discrepancy Reporting Summary the insurers enter into with CMS after EDGE data is finalized; submission of the state affirmation of data form, submission of the OCI audit phase I form and confirmation that the totals on that form match claim totals submitted on the final WIHSP claim submission report.</p> <p>*July 24, 2020: 2019 Annual Report submitted to CCIIO and posted to the OCI website.</p> <p>*July 30, 2020: Annual Post Award Forum held...for more information see Section D of this report.</p> <p>*August 3, 2020: Insurers notified that Phase I of the audit was complete.</p> <p>*August 6, 2020: OCI sent insurers their PY 2019 payments. Wisconsin's state statutory deadline for</p>	

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payment is August 15 of each year.

***August 6, 2020: Began work on the 2021 Pass Through Report.**

***August 7, 2020: Insurers were notified that PY 2019 payment had been sent.**

***August 10, 2020: OCI began Phase II of the audit process. Insurers were asked to provide proof of payment for two claims that were submitted to OCI under Phase I of the audit process.**

***August 17, 2020: OCI submitted the Q2 report to CCIIO.**

***August 28, 2020: The Federal Periodic Review call to discuss the 2019 annual report was held.**

***September 14, 2020: PY 2021 Pass Through Report was sent to CCIIO.**

***September 22, 2020: Insurer Phase II proof of payment documents were due to OCI.**

13. Describe any implementation and/or operational challenges, including plans for and results of associated corrective actions. After the first quarter, only report on changes and/or updates, as appropriate.

This was the first year OCI collected final claims data and implemented the audit process. Two key lessons learned:

- 1. Remind insurers that item three on the OCI attestation form requires them to provide us with the confirmation page from their CMS discrepancy report.**
- 2. We will maintain flexibility in terms of the "proof of payment" submitted from the insurers for the Phase II audit but will need to include additional instructions, such as reminding insurers to provide the page and claim line as to where a claim is located on a remittance advice.**

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D. POST-AWARD FORUM

(for Quarter Post-Award Forum was held)

14. Was the date, time, and location of the Post-Award Forum advertised 30 days in advance?

Yes

No

15. State website address where Post-Award Forum was advertised

We have included a link to the open meeting notice that was sent out prior to the meeting. It is posted on the OCI website under “open meeting notices.”

<https://oci.wi.gov/Documents/AboutOCI/20200730MtgNot-WIHSPForum.pdf>

16. Date Post-Award Forum took place

July 30, 2020

17. Summary of Post-Award Forum, held in accordance with §155.1320(c), including all public comments received and actions taken in response to concerns or comments.

The forum was held via Zoom due to the COVID-19 pandemic. A list of attendees is included with the email containing this Q3 report.

OCI delivered a presentation and posted it to the OCI website:

<https://oci.wi.gov/Documents/AboutOCI>

[WisconsinHealthcareStabilityPlan2020annualforumpresentation7_28_20.pdf](#)

There were no questions or comments offered during or after the OCI presentation.

The Wisconsin Association of Health Plans submitted comments acknowledging the role WIHSP has played in reducing rates. Their written comments are attached with the email containing this Q3 report.

Quartz Health Plan submitted comments detailing how WIHSP has allowed them to offer plans with rates lower than they would have without the program in place. Their written comments are attached with the email containing this Q3 report.

18. Other Attachments (attach other documents as needed pertaining to Post-Award Form

All documents related to the post award forum are included with the email containing this Q3 report.