

Date: May 31, 2023

Subject: Frequently Asked Question on Qualified Health Plans (QHPs) and Plan Data Submissions to the Plan Finder

Must QHP issuers submit data to the Plan Finder for QHPs sold off-Marketplace to meet Plan Finder plan data submission requirements?

Issuers are required to provide plan data for the Plan Finder through the Plans and Benefits Template (P&BT) for all QHPs that are offered in the individual and small group markets, regardless of marketing channel.¹ Consistent with guaranteed availability standards, QHPs generally must be available for off-Marketplace enrollment, regardless of whether the QHP is intended primarily for sale or is being marketed exclusively in the Marketplace.² Issuers must provide the P&BT containing all plan data for all QHPs, including QHPs sold off-Marketplace, through the HIOS Rates and Benefits Information System (RBIS).

¹ See 45 CFR 159.120.

² See the Frequently Asked Questions on Health Insurance Market Reforms and Marketplace Standards (May 16, 2014), available at: <https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/Downloads/Final-Master-FAQs-5-16-14.pdf>. Also see Frequently Asked Question on Qualified Health Plans and Guaranteed Availability Standards (June 3, 2014), available at: https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/Downloads/faq_on_qhps_and_guaranteed_availability_6314.pdf.