

New York Health Benefit Exchange

Detailed Design Review Summary for Section 4.0 Plan Management October 9-10, 2012

<u>Item Number</u>	<u>Topic</u>
4.7	Timeline for QHP Accreditation

In July 2012, Exchange staff conducted a review of the current NCQA and URAC accreditation status of health plans licensed in New York State using information publicly available. The results of that review are summarized in an excel file and included as Attachment A. While many New York State plans have achieved full or partial accreditation for some of their lines of business or functional areas, the Exchange has determined that there would not be sufficient time for health plans to come into compliance with this requirement in 2014. In addition, because New York Medicaid has not required Medicaid plans to seek independent accreditation, a decision to enforce this requirement in 2014 would likely restrict their ability to participate in the Exchange in its early years of operation.

Health plans seeking certification as a Qualified Health Plan (QHP) will be required to respond to an invitation to participate issued by the Exchange. Health plans will be asked to indicate whether the health plan is accredited at the time application, and if so, by which entity and for which lines of business or functional areas. The Exchange will verify accreditation with the respective accreditation body.

However, given the current status of health plan accreditation in New York, the time required to complete the certification process based on experience, and the fact that New York has a strong regulatory surveillance process to oversee and monitor health plan compliance and operations, the Exchange has determined that it will not require accreditation until 2020. The Exchange will work closely with the divisions of the Departments of Financial and Services and Health conducting these regulatory functions and continually assess health plan progress toward achieving accreditation. The Exchange will review its approach to the accreditation process in 2016.

The Exchange appreciates the flexibility offered in the final regulations to develop a timeline for accreditation that meets the needs of New York's market and consumers. The Exchange will review further guidance on the phased in approach to the establishment of additional accrediting agencies in the future and comply with regulations set forth in 45 CFR 155.1080 and 45 CFR 155.275 as guidelines to further developing a timeline for accreditation, as well as processes for ensuring QHP accreditation.