System Validations for the 2015 MLR Reporting Year

When an issuer uploads the annual MLR reporting form or Risk Corridors Plan-level Data forms into the Health Insurance Oversight System (HIOS), the submission undergoes several automated validations. Some of the validations result in an error message and the issuer must resolve the problem before they can attest to their submission. Other validations result in warning messages to indicate a potential problem with their submission but do not prevent the company from attesting to their submission.

The user who uploaded the submission receives the error messages and the warning messages. The company CEO and CFO only receive the warning messages. The warning messages sent to the CEO and CFO includes a notification that they may attest to the company submission if the warning messages are unfounded.

In addition to receiving validation messages by email, company users may view the full list of validation messages using the "Warnings and Comparison Report" on the "View Uploaded Data" page or the "Attestation" page in HIOS. Each validation message indicates the name of the template that triggered the validation, as well as the relevant row and column within the template. Some of the validations apply to the entire submission, including all state workbooks and the Grand Total (GT) workbook. Others apply only to state workbook or only to the GT workbook. Validations that apply to the Risk Corridors Plan-level Data Form are indicated as "RC".

Error Messages

Validation	Template	Trigger	Message
Unofficial Template	State GT RC	Submission contains templates that were not generated by HIOS for the particular company, state, and reporting year. *(Issuers may only upload official templates downloaded from HIOS.)*	"The MLR Annual Form is not of the correct version. Please download the updated MLR Annual Form from the 'Download Templates' section." "Cannot accept [Workbook Name]. Please complete a workbook for [State] and resubmit your .ZIP file."
Extra Template	State GT RC	Submission contains templates for one or more states that were not contained in the download. *(Users may only upload templates for the company's associated states.)*	"The uploaded MLR Annual Form for this state is not associated with the selected Company."
Missing Template	State GT RC	Submission is missing templates for one or more states that were contained in the download. *(All templates downloaded from HIOS must be completed and uploaded.)*	"Please complete a workbook for [State] and resubmit your .ZIP file."

Validation	Template	Trigger	Message
Duplicate Templates	State GT RC	Submission contains duplicate templates. *(Users may only upload one template per state for the company.)*	"[File Name]: Cannot accept duplicate files."
Incorrect Template	State GT RC	Submission contains incorrect version of RC or MLR templates	"The MLR template, or RC Plan-Level Data template is not of the correct version. Please download the updated RC Plan-Level Data template from the "Download Templates" section.
Incorrect Zipping Method	State GT RC	Submission contains MLR templates that were not zipped correctly.	"Zip files must be created through the selection of the individual Excel files. Any other method of zipping up files will not be permitted for upload by the system."
Invalid Data Type	State GT RC	Invalid data type (e.g., character values in numeric field, out of bounds numeric entry, etc.)	e.g. "Should contain only a numeric value up to ten trillion and at most 15 decimals."
Data in Grey Cells	State GT	Data entered into cells not designated for user entry (grey cells).	"Should not contain user input."
Blank Total Premium Earned	RC	Columns E, I, or M are blank in a row but Plan ID and/or Plan Name in the same row are populated.	"Premium Earned is required."
Incorrect Format for HIOS Plan ID	RC	HIOS Plan ID does not have 14 characters in format [HIOS issuer ID (5 digits) +issuer state (2 letter abbreviation) +component plan ID (7 digits)].	"HIOS Plan ID does not have the correct format."
Number of User-added Plan IDs for "Substantially the Same as Exchange QHPs"	RC	The number of Plan IDs in Table 4 exceeds the number of Plan IDs in Table 2.	"The number of user-added HIOS Plan IDs for "Substantially the Same as Exchange QHPs" in Table 4 cannot exceed the number of HIOS Plan IDs in Table 2.
Duplicate Plan IDs within a Table	RC	User adds a HIOS Plan ID that already exists in the table (Table 2 or Table 4 only).	e.g. "[HIOS Plan ID] already exists in Table 2, Row 5. Please delete the duplicate entry or correct the HIOS Plan ID and resubmit."

Validation	Template	Trigger	Message
Duplicate Plan IDs in "Substantially the Same as Exchange QHPs"	RC	User adds a HIOS Plan ID in Table 4 that already exists in Table 2 or Table 3.	e.g. "[HIOS Plan ID] in Table 4 cannot be the same as [HIOS Plan ID] in Table 2 or Table 3."
Duplicate Plan IDs between Individual and Small Group tabs	RC	User adds a HIOS Plan ID in a table on the Small Group tab that already exists in a table on the Individual tab.	e.g. "[HIOS Plan ID] cannot be the same as [HIOS Plan ID] in Small Group, Table 2, Row 4."
Percentage of Market in QHPs Exceeds 100%	RC	The amount calculated in Tab 3, Line 1, Column A or Column B is greater than 100%	e.g. "Individual total premiums in QHPs cannot exceed individual total premium earned in all non-grandfathered ACA-compliant plans."
Blank Rows between Plans	RC	User adds a blank row between plans in Table 2 or Table 4.	"There cannot be any blank preceding rows between plans."
MLR and RC Template Data Inconsistencies	RC	RC template Tab 3 Lines 2, 3, or 7 do not match the MLR template Part 3 Lines 3.1, 3.5, or 3.7 respectively.	"The [USER ENTERED VALUE] value on the RC template [RC Line] does not match the MLR template [MLR Line]"

Warning Messages

Validation	Template	Trigger	Message
Blank Tabs	State GT	Parts 1, 2, 3, or 4 of the reporting form are blank (*state templates*) or Part 1, 2, 4 is blank (*GT template*).	e.g. "Pt 1 Summary of Data worksheet is required."
Negative Member Months	State GT	Part 1 Line 7.4 *(member months)* is negative.	"A non-negative number is expected."
Member Months Inconsistent with Premium or Claims	State GT	Part 1 Line 1.1 *(total direct premium earned)* > 0 OR Part 1 Line 2.1 *(total incurred claims)* > 0 **AND** Part 1 Line 7.4 *(member months)* ≤ 0 or is Blank. **-OR-** Part 1 Line 1.1 *(total direct premium earned)* ≤ 0 or blank OR Part 1 Line 2.1 *(total incurred claims)* ≤ 0 or is Blank **AND** Part 1 Line 7.4 *(member months)* > 0.	"Values reported in Part 1, Line 1.1; Part 1, Line 2.1; and/or Part 1, Line 7.4 suggest an inconsistency."
Unusual Premium per Life Year	State GT	Part 2 Line 1.1 *(direct premium written)* / (Part 1 Line 7.4 *(member months)* / 12) is < $120 or > $12,000. *(Health insurance coverage columns only.)*	"Values reported in Part 2, Line 1.1 and Part 1, Line 7.4 suggest an inconsistency."

Validation	Template	Trigger	Message
Sum of States ≠ GT Values	GT	Sum of values reported on all state templates ≠ value reported on GT template. *(Health insurance coverage and mini-med columns only; Parts 1 and 2, and Part 4 Sections 1, 2, 3, 4a, 4g only.)*	**"**The sum of values reported for each state should balance to the GT."
Incorrect MLR Calculation	State GT	Part 3 Line 5.3 *(credibility-adjusted MLR)* > HIOS-calculated value **AND** Part 3 Line 4.1 Column Total *(life-years)* ≥ 1,000.	"MLR DISCREPANCY: The [user entered value] value reported by user does not match the system calculated value of [system calculated value]."
Incorrect Rebate Amount	State GT	Part 3 Line 6.4 *(rebate amount)* < HIOS-calculated value **AND** Part 3 Line 4.1 Column Total *(life-years)* ≥ 1,000.	"REBATE DISCREPANCY: The [user entered value] value reported by user does not match the system calculated value of [system calculated value]."
Blank State Premium Tax Rate	State	Part 5 Line 1 *(state premium tax rate used to determine allowable CBE)* is Blank **AND** Part 1 Line 3.2c *(community benefit expenditures deductible from premium in MLR calculations)* ≠ 0 or is not Blank.	"Values reported in Part 1 Line 3.2c require the completion of Part 5 Line 1 of your filing."
Blank Expense Allocation Descriptions	GT	Part 6 *(expense allocation)* is Blank **AND** Part 1 Sections 3, 4, 5 or Part 2 Section 2 ≠ 0 or are not Blank.	"Values reported in Part 1 Sections 3, 4, & 5 and Part 2 Section 2 require the completion of Part 6 of your filing. (Not necessary on a state by state basis.)"
Blank Rebate Disbursement Descriptions	State GT	Part 4 Line 4.g *(amount of unclaimed rebates from prior MLR reporting years)* > 0 **AND** Part 4 Line 4.h *(methods used to locate policyholders/ subscribers for prior MLR reporting year's unclaimed rebates)* is blank or Line 4.i *(disbursement of prior MLR reporting year's unclaimed rebates)* is Blank.	"Part 4 Rebate Disbursement Lines 4h and 4i are required."

Validation	Template	Trigger	Message
Blank Affiliate Names	State	Part 5 Section 2 *(Affiliate(s) name(s) with whom blended rate adjustments were made)* is Blank **AND** Part 2 Line 2.15 *(blended rate adjustment)* is not Blank. **-OR-** Part 5 Section 3 *(Affiliate(s) name(s) with whom dual contract experience is being reported)* is Blank **AND** Parts 1 & 2 Columns 3, 8, 13, 18, 21, 24, 37 *(dual contract)* are not Blank.	"Values reported in Part 2 Line 2.15 require the completion of Part 5 Line 2 of your filing." **-OR-** "Values reported in the Dual Contract 3/31/13 Columns require the completion of Part 5 Line 3 of your filing."
Expat Data in State Template	State	State template Expatriate Plans Columns are not Blank. *(Expat data should only be reported on GT template.)*	"Data is only expected in the "Expat" fields for the GT MLR-A template."
Student Health Data in State Template	State	State template Student Health Plans Columns are not Blank. *(Student health data should only be reported on GT template.)*	"Data is only expected in the "Student Health Plan" fields for the GT MLR-A template."
Missing RC Template	RC	A company with at least one QHP issuer has not submitted one or all of its QHP issuers on record.	"Your company must upload risk corridors plan-level templates for all of its issuers that offered a certified QHP in 2014. Check that your submissions are complete for all QHP issuers and resubmit your .zip file."
MLR Risk Corridors Column Data Inconsistencies	State	MLR form Part 3 Line 3.8 in the RC column is <97% **OR** >103% **AND** Part 3 Line 3.10 = 0 or blank.	"The Risk Corridors [USER ENTERED VALUE] unadjusted ratio is in the range to receive, or owe risk corridors. Please populate Part 3 Line 1.10 with the corresponding amount from the Risk Corridors template and resubmit."
MLR Risk Corridors Column Data Inconsistencies	State	MLR form Part 3 Line 3.10 is ≠ 0 and Part 3 Line 1.7 in the CY column **OR** Part 2 Line 1.11 = 0 or blank.	"The Risk Corridors [USER ENTERED VALUE] value requires that it is populated in both Part 3 Line 1.7 of the CY column and Part 2 Line 1.11 in the 3/31 Column."