

PPACA Actuarial Sub-group Issues Identification
Master List, 6/14/10

Issue #	Issue	References	Resolution	Exceptions	IRD Exposure Date
1	Formula excludes LAE.	IRD001	Resolved		6/1/2010
2	Aggregation is by licensed entity.	IRD002	Referred	27	
3	Aggregation is by state.	IRD003	Resolved	Identify exceptions	6/1/2010
4	Aggregation is by 3 pools.	IRD004	Resolved	Identify exceptions (jumbo groups)	6/1/2010
5	Rebates will be based upon calendar year experience.	IRD005	Resolved		6/1/2010
6	Calculation of rebates should not double count rebates.	IRD006	Resolved		6/1/2010
7	Clinical services should be limited to incurred claims defined in SSAPs.	IRD007	Resolved		6/1/2010
8	"Contract" reserves should enter the calculation as directed within SSAPs.	IRD008	Referred		
9	Contract reserve methodology should be stipulated (net level premium, full preliminary term,...).	IRD009	Open		
10	Claim reserves should be calculated on a run out basis of 3 to 6 months.	IRD010	Resolved		6/1/2010
11	Calendar year calculation.	IRD011	Closed - determined to be a duplicate of IRD005.		
12	Premium credits can be the means of distribution.	IRD012	Referred		
13	Issuer must send checks to canceled individual policyholders.	IRD013	Resolved		6/1/2010
14	Credibility based upon MedSupp-like adjustments rather than z (1-z).	IRD014	Preliminary Resolution		6/14/2010
15	Fair treatment of "different plans" (priced MLR less than PPACA minimum...).	IRD015	Open		
16	Forfeiture , not deferral of rebate adjustments.	IRD016	Open		
17	Definition of Quality Improvement Expenses.	IRD017	Open		
18	Results should be on direct basis, no reinsurance.	IRD018	Open		
19	Distribution by issuer to policyholder , not to enrollees.	IRD019	Referred		
20	Large claim pooling.	IRD020	Closed - incorporated into IRD044		
21	Combining Small Group with Individual.	IRD021	Open		
22	Treatment of experience refunds within MLR.	IRD022	Preliminary Resolution - add to incurred claims		6/8/2010
23	Treatment of credibility adjustments.	IRD023	Open		
24	Treatment of local taxes, property taxes, investment taxes.	IRD024	Open		
25	Treatment of assessments made by insurance department.	IRD025	Open		
26	Rebates reported to and evaluated by states, not HHS.	IRD026	Open		
27	Issuers who cover the same employer's employees with both a PPO & HMO may need special treatment.	IRD027	Open		
28	Multi-state employer included in issue state.	IRD028	Open		
29	Deferral of including new business less than twelve months old.	IRD029	Open		
30	Transition from 2011 through 2014.	IRD030	Open		
31	Inclusion of payments or receipts for risk adjustment, risk corridors, and reinsurance in earned premium.	IRD031	Open		
32	Employees who disenroll from a plan before the end of the calendar year are eligible for a rebate.	IRD032	Open		
33	Treatment of rebate checks returned to issuer.	IRD033	Open		
34	A transition period is needed prior to 2014.	IRD034	Referred		
35	Plans that cover people living, traveling or studying outside of their home country ("expatriate plan business") should be given special treatment in the MLR (e.g., exclude from the MLR or allow a lower MLR for this type of business).	IRD035	Open		
36	Premium deficiency reserves should not be included in the definition of incurred claims.	IRD036	Open		
37	Reserves for future contingent benefits and lawsuits should be included in the definition of incurred claims.	IRD037	Open		
38	FEHBP is subject to rebate law.	IRD038	Open		
39	Three-year averaging will be used prior to 2014.	IRD039	Preliminary Resolution - three-year averaging will not be used prior to 2014.		6/8/2010
40	Experience that does not yield a rebate in a prior year can't be used to offset experience that does produce a rebate in the current year.	IRD040	Preliminary Resolution	Possible exceptions for smaller plans	6/8/2010
41	Letter to HHS concerning transition strategy outcomes.	IRD041	Preliminary Resolution		6/8/2010
42	Credibility adjustments will be continuous, not either/or.	IRD042	Preliminary Resolution		6/14/2010
43	State examination fees should be subtracted from the MLR denominator in the rebate calculation.	IRD043	Open		
44	A hierarchy for application of credibility and pooling techniques will be used.	IRD044	Open		