

Qualified Health Plan Issuer Application Instructions

Plan Year 2027

**Extracted section:
Section 2K: Plan ID Crosswalk**

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1. Introduction

The Plan ID Crosswalk Template crosswalks plan year (PY) 2026 qualified health plan (QHP) plan ID and service area combinations to PY2027 QHP plan IDs. These data facilitate re-enrollment transactions from the Centers for Medicare & Medicaid Services (CMS) to issuers for enrollees in the Individual Market who did not actively select a different QHP or terminated their coverage during Open Enrollment. These instructions apply to QHP and stand-alone dental plan (SADP) issuers that offered Individual Market plans on the Exchange during PY2026.

The instructions for this section apply to the following issuer types:

- QHP
- SADP

See Appendix D for additional information.

2. Data Requirements

To complete this section, issuers need the following:

1. Health Insurance Oversight System (HIOS) Issuer ID
2. Issuer's state
3. Market coverage
4. Completed Plans & Benefits Template
5. Completed Service Area Template
6. Completed State Authorization Form.

3. Quick Reference

Key Changes for 2027

- ◆ No changes for the 2027 QHP Application.

Tips for the Plan ID Crosswalk Section

- ◆ Submit the Plan ID Crosswalk Template, justifications if needed, and state authorization in the Marketplace Plan Management System (MPMS) Module. Submit separate Plan ID Crosswalk Templates in the MPMS Module for SADPs.
- ◆ New issuers do not need to submit Plan ID Crosswalk Templates unless they will receive plans from a discontinuing issuer, which is a rare situation. However, to complete their application, new issuers must complete the questions in the Plan ID Crosswalk application section and submit the Plan Crosswalk application group in the MPMS Module.
- ◆ Issuers must provide alternative plans to crosswalk enrollees who age off child-only plans and alternatives for those who age off or otherwise lose eligibility for catastrophic plans.
- ◆ CMS has deferred the Federally-facilitated Small Business Health Options Program's (FF-SHOP's) ability to auto-renew employees. Do not submit a Plan ID Crosswalk Template for FF-SHOP plans.
- ◆ The 2024 U.S. Department of Health and Human Services (HHS) Notice of Benefit and Payment Parameters requires Exchanges to ensure that a consumer whose current year QHP is no longer available be auto re-enrolled into a QHP that has the most similar network compared to the enrollee's current QHP and that meets the other requirements that also apply to plan crosswalk at 45 CFR 155.335(j). Therefore, issuers should consider network ID when selecting crosswalk plans, if possible, along with product ID and plan type as has been required in prior years.¹

Additional Resources

- ◆ There are [supporting documents](#) for this section.
- ◆ There are [instructional videos](#) for this section.
- ◆ There are [templates](#) for this section.

¹ For a complete list of plan crosswalk rules, refer to [45 CFR 155.335\(j\)](#).

4. Detailed Section Instructions

Issuers must submit evidence (such as a signed State Authorization form or an email confirmation) that their state has authorized their Plan ID Crosswalk Template in the MPMS Module along with the completed template by no later than the deadline for the initial application submission.

States can review the Plan ID Crosswalk Template for compliance with the Affordable Care Act (ACA) market reforms and individually determine how they will review the Plan ID Crosswalk Template. For example, a state could review the submitted Plan ID Crosswalk Template for consistency with state and federal requirements and that it matches the expectations of its form filing reviews.

CMS does not send Plan ID Crosswalk Templates to states, but state regulators can ask the issuer to provide this template in addition to the issuer's QHP Application (as part of the National Association of Insurance Commissioners' [NAIC's] System for Electronic Rates & Forms Filing [SERFF] binder, for example).

Issuers in states that do not enforce the ACA market-wide requirements should submit the authorization form to their state's department of insurance and CMS's Compliance and Enforcement Division (formfiling@cms.hhs.gov) to obtain the necessary authorization for submission.

In the MPMS Module, returning issuers can generate prepopulated Plan ID Crosswalk Templates to submit as part of their QHP Application. The prepopulated templates import an issuer's plan IDs and associated service areas and network IDs from the prior plan year. Refer to the [MPMS User Guide](#) for details on how to generate prepopulated Plan ID Crosswalk Templates. New issuers are not required to submit Plan ID Crosswalk Templates in the MPMS Module to complete their application unless they will receive plans from a discontinuing issuer, which is a rare situation. Although new issuers may not need templates, they must complete the questions in the Plan ID Crosswalk application section and submit the Plan Crosswalk application group in the MPMS Module.

The following steps outline how to complete the Plan ID Crosswalk Template, beginning with the *2026 Plan Crosswalk* tab.

2026 Plan Crosswalk Tab	Steps
Import 2026 Plans & Benefits and Service Area Template	<p>Note: A prepopulated Plan ID Crosswalk Template generated in the MPMS Module imports the issuer's plan IDs and associated service areas and network IDs from PY2026. Refer to the MPMS User Guide for details on how to generate a prepopulated Plan ID Crosswalk Template in the MPMS Module.</p> <p>For issuers who manually import PY2026 data: Click Import 2026 Plans & Benefits and Service Area Template to import the completed templates.</p> <p>The template prompts the user to select the completed 2026 Plans & Benefits and Service Area Templates. Before importing, save these templates in the same folder; both must be uploaded at the same time. To select both files, click one template, then press and hold Ctrl on Windows or Cmd on macOS while clicking on the other template, then click Open. Select exactly one of each type of template.</p> <p>The Plan ID Crosswalk Template will populate a list of PY2026 plan IDs and their associated service areas and network IDs on the <i>2026 Plan and Service Area Data</i> tab. Review this tab for accuracy. After the PY2026 plan and service area data have been imported, the <i>2026 Plan Crosswalk</i> tab will be populated with all applicable issuer information and a row for each PY2026 plan ID.</p>
HIOS Issuer ID	Ensure the template accurately populated the five-digit HIOS Issuer ID.
Issuer State	Ensure the template accurately populated the state where the issuer is offering coverage.
Market Coverage	Ensure the template accurately populated the market coverage from the drop-down menu. The FF-SHOP Exchange no longer allows auto-renewals; this field is hard coded to Individual .

2026 Plan Crosswalk Tab	Steps
Dental Only	Ensure the template accurately indicates whether this Plan ID Crosswalk Template is for dental-only plans. Choose from the following: <ul style="list-style-type: none"> ◆ Yes—this template is for SADPs only. ◆ No—this template is for QHPs.
Crosswalk Level	Choose the level at which the user would like to crosswalk each PY2026 plan from the drop-down menu. Select from the following options: <ul style="list-style-type: none"> ◆ Crosswalking to the same plan ID: Crosswalking the PY2026 plan to the same plan ID for PY2027 with no service area changes. ◆ Crosswalking at the plan ID level: No service area changes but using a different PY2027 plan ID to reflect the same plan. ◆ Crosswalking at the plan ID and county coverage level: The issuer’s service area changed for the upcoming year and the PY2026 plan needs to be crosswalked to two or more PY2027 plan IDs. Note: If the PY2026 plan covered the entire state, the plan must be crosswalked to PY2027 plan IDs for every county in the state. ◆ Crosswalking at the ZIP Code level for one or more counties: The service area changed for the upcoming year and the PY2026 plan needs to be crosswalked to two or more PY2027 plan IDs for the same county. This option requires issuers to pick the counties from the PY2026 plan’s service area to crosswalk at the ZIP Code level. The remaining PY2026 service area will be crosswalked at the county level. Note: Do not crosswalk at the ZIP Code level unless necessary. ◆ Discontinue with no crosswalk: A PY2026 plan is being discontinued with no re-enrollment option for its enrollees. ◆ Plan withdrawn prior to certification: Remove PY2026 plans withdrawn from the Exchange before certification from the Plan ID Crosswalk Template. Optionally, select this option if the PY2026 plan ID listed on the template was withdrawn or not approved by the state or the Federally-facilitated Exchange (FFE) to be offered on the Exchange in PY2027.
Counties Crosswalked at ZIP Code Level	Select the counties in the PY2026 plan’s service area to crosswalk at the ZIP Code level from the pop-up menu.

To complete the information on the *2027 Plan Crosswalk* tab, follow the steps in the table below.

2027 Plan Crosswalk Tab	Steps
Create “2027 Crosswalk Tab”	Click Create “2027 Crosswalk Tab.” This action creates the <i>2027 Plan Crosswalk</i> tab. The first four columns— <i>2026 HIOS Plan ID</i> , <i>County Name</i> , <i>Service Area ZIP Codes</i> , and <i>Crosswalk Level</i> —and the last column— <i>2026 Network ID</i> —auto-populate based on the issuer’s entries in the <i>2026 Plan Crosswalk</i> tab. If issuers crosswalk at the plan ID, county level for one or more plans, a row will appear for each county that plan covered in PY2026. If issuers crosswalk at the ZIP Code level for specific counties covered by a PY2026 plan, a row will appear for each combination of plan ID, county, and ZIP Code. Click Create “2027 Crosswalk Tab” only after completion of the <i>2026 Plan Crosswalk</i> tab. A <i>2027 Plan Crosswalk</i> tab cannot be changed after creation. To make changes, issuers must click Create “2027 Crosswalk Tab” again to clear all data and begin a new copy of the <i>2027 Plan Crosswalk</i> tab. Issuers can copy and paste previously entered information into a separate workbook and then into a new copy to save previous work when changes require replacing the <i>2027 Plan Crosswalk</i> tab.
Crosswalk Reason	Choose the reason for the crosswalk from the drop-down menu. Certain options are only available for specific crosswalk levels.

2027 Plan Crosswalk Tab	Steps
	<p>Table 2K-1 details crosswalk reason entries for each crosswalk level:</p> <ul style="list-style-type: none"> ◆ Renewing exact same product/plan combination (same PY2026 plan ID): Crosswalking this plan ID/service area to the exact same HIOS Plan ID. The template auto-populates the <i>PY2027 Plan ID</i> field with the PY2026 plan ID. Use the same HIOS Plan ID if the same plan was offered the previous plan year and remains available for the upcoming 2027 plan year. Issuers must comply with the “same plan” standards as defined in 45 CFR 144.103. ◆ Renewing exact same product/plan combination (different PY2027 plan ID): Crosswalking this plan ID/service area to the same product/plan combination but with a different HIOS Plan ID for PY2027. If possible, use the same HIOS Plan ID if the previous year’s same plan ID/service area combination remains available. Issuers continuing a plan but wishing to crosswalk to a different HIOS Plan ID must obtain approval from their state regulatory authority before submitting the Plan ID Crosswalk Template. Issuers must comply with the “same plan” standards as defined in 45 CFR 144.103. ◆ Renewing product; renewal in a different plan within product: Renewing this product but crosswalking this plan ID/service area to a different plan in the product offered on the FFE. With this option, issuers must use the same product ID embedded in the plan’s 2026 plan ID. ◆ Continuing product; no plan available in the particular service area under that product; enrollment in a different product: Continuing this product in PY2027 but no longer offering any plans in part of the service area covered by the product in PY2026 and crosswalking to a plan in a different product offered on the FFE. Select this reason for the portion of the service area where issuers no longer offer any plans under that product. With this option, issuers must crosswalk the PY2026 plan ID to a PY2027 plan ID with a different product ID. ◆ Continuing product; no plan available in the particular service area under that product; no enrollment option: Continuing a PY2026 product with no plan under this product available to crosswalk to for this plan/service area combination. Do not enroll such plans into a plan offered off the Exchange. Selecting this option will disable the <i>2027 HIOS Plan ID</i> field. ◆ Continuing product; no silver plan available in the particular service area under that product, enrollment in a silver plan under a different product: No silver plan is available in the enrollee’s product in a particular service area and the enrollee is being enrolled in a silver plan in another product. ◆ Discontinuing product; enrollment into a different product: This PY2026 product is discontinued for PY2027 and enrollees in this plan and the associated service area will be re-enrolled in a plan under a different product offered on the FFE. The entered PY2027 plan ID must have a different product ID, and issuers cannot enter the discontinued PY2026 product ID for any other row under the PY2027 plan ID. Crosswalk any discontinued PY2026 plan to an available plan in a different product, if one exists. In accordance with the hierarchy established in 45 CFR 155.355(j)(2), if issuers do not provide a crosswalk for a discontinued plan but still offer products in the same service areas, CMS will crosswalk the discontinued plan to another product issuers offer under the same HIOS Issuer ID. ◆ Discontinuing product; no enrollment option: Discontinuing a PY2026 product for PY2027 without an enrollment option on the FFE for PY2026 enrollees in this plan ID/service area combination. Do not enroll pertinent plans into a plan offered off the Exchange. Selecting this option disables the <i>PY2027 Plan ID</i> field. Under this option, issuers cannot enter the discontinued PY2026 product ID for any other row under the PY2026 plan ID. Crosswalk any discontinued PY2026 plan to an available plan in a different product if one exists. In accordance with the hierarchy established in 45 CFR 155.355(j)(2), if issuers do not provide a crosswalk for a discontinued plan but still offer products in the same service areas, CMS will crosswalk the discontinued plan to another product issuers offer under the same HIOS Issuer ID.

2027 Plan Crosswalk Tab	Steps
2027 HIOS Plan ID	Enter the PY2027 plan ID to crosswalk enrollees to for the row's PY2026 plan ID/service area. This field is auto-populated when issuers choose Renewing exact same product/plan combination (Same 2026 Plan ID) under <i>Crosswalk Reason</i> . This field is disabled when issuers choose Discontinuing product; no enrollment option or Continuing product; no plan available in the particular service area under that product; no enrollment option under <i>Crosswalk Reason</i> . Note: Only enter PY2027 plan IDs for plans offered on the Exchange and listed in the 2027 QHP Application. CMS will not accept any PY2027 plan IDs for plans sold only off the Exchange.
Is the PY2027 Plan a Catastrophic or Child-Only Plan?	This field will default to No . Please select Yes if crosswalking to a catastrophic or child-only plan.
PY2027 Plan ID for Enrollees Losing Eligibility for Catastrophic or Child-Only Plan	If issuers respond Yes to <i>Is the 2027 Plan a Catastrophic or Child-Only Plan?</i> , this field will allow issuers to enter a PY2027 plan ID. Enrollees who no longer meet the criteria for continued eligibility in these plans will be crosswalked to the PY2027 plan ID entered in this field.
Associated Policy Form Numbers and NAIC SERFF Tracking Numbers for Form Filings	Complete the following optional data fields if directed to do so by the issuer's state regulator: <ul style="list-style-type: none"> ◆ <i>PY2026 Plan ID</i>—Associated Policy Form numbers and NAIC SERFF tracking numbers for Form Filings. ◆ <i>PY2027 Plan ID</i>—Associated Policy Form numbers and NAIC SERFF tracking numbers for Form Filings. ◆ <i>PY2027 Plan ID (Catastrophic or Child-Only)</i>—Associated Policy Form numbers and NAIC SERFF tracking numbers for Form Filings.

See Figure 2K-1 for a sample completed Plan ID Crosswalk Template.

Figure 2K-1. Sample Plan ID Crosswalk Template

2026 HIOS Plan ID (Standard Component)			Crosswalk Level		Counties Crosswalked at Zip Level
Required	Required: Indicate whether you would like to crosswalk your 2026 to 2027 Plan IDs at the plan, county or zip code level.	Required: Indicate whether you would like to crosswalk your 2026 to 2027 Plan IDs at the plan, county or zip code level.	Required: Indicate whether you would like to crosswalk your 2026 to 2027 Plan IDs at the plan, county or zip code level.	Required: Indicate whether you would like to crosswalk your 2026 to 2027 Plan IDs at the plan, county or zip code level.	Required: Indicate whether you would like to crosswalk your 2026 to 2027 Plan IDs at the plan, county or zip code level.
12345AK1234567	Crosswalking to same Plan ID				
12345AK1234568	Crosswalking to same Plan ID				

Actions

- Import 2026 Plans & Benefits Template and Service Area**
Please save your completed 2026 Plans & Benefits Template and Service Area Template to your harddrive and then select the button below to import the data.
- Create "2027 Crosswalk Tab"**
Select the button below to create the 2027 Crosswalk Tab based upon your entry.
- Validate Data**
Select the button below to validate information entered into all tabs. *Warning: Due to large data size, validation may take several minutes.*
- Finalize Template**
Select the button below to export data to XML file.

Table 2K-1 lists the crosswalk reason and PY2027 plan ID entry options for each crosswalk level.

Table 2K-1. Crosswalk Level, Reason for Crosswalk, and PY2027 Plan ID Entry Options

Crosswalk Level	Crosswalk Reason	2027 HIOS Plan ID
Crosswalking to same plan ID	Renewing exact same product/plan combination (auto-populated) (same PY2026 plan ID)	Template auto-populates field with PY2026 plan ID
Crosswalking at the plan ID level	Renewing exact same product/plan combination (different PY2027 plan ID)	Different plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same product ID as PY2026 plan ID
	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	Plan ID with different product ID from PY2026 plan ID
	Continuing product; no silver plan available in the particular service area under that product, enrollment in a silver plan under a different product	Plan ID with different product ID from PY2027 plan ID
	Discontinuing product; enrollment into a different product	Plan ID with different product ID from PY2026 plan ID
Crosswalking at the plan ID and county coverage level	Renewing exact same product/plan combination (same PY2026 plan ID)	Template auto-populates field with PY2026 plan ID
	Renewing exact same product/plan combination (different PY2027 plan ID)	Different plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same product ID as PY2026 plan ID
	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	Plan ID with different product ID from PY2026 plan ID
	Continuing product; no silver plan available in the particular service area under that product, enrollment in a silver plan under a different product	Plan ID with different product ID from PY2027 plan ID
	Continuing product; no plan available in the particular service area under that product; no enrollment option	<i>PY2027 HIOS Plan ID</i> field is disabled
	Discontinuing product; enrollment into a different product	Plan ID with different product ID from PY2026 plan ID
	Discontinuing product; no enrollment option	<i>PY2027 HIOS Plan ID</i> field is disabled
Crosswalking at the ZIP Code level for one or more counties	Renewing exact same product/plan combination (same PY2026 plan ID)	Template populates field with PY2026 plan ID
	Renewing exact same product/plan combination (different PY2027 plan ID)	Different plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same product ID as PY2026 plan ID
	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	Plan ID with different product ID from PY2026 plan ID
	Continuing product; no plan available in the particular service area under that product; no enrollment option	<i>PY2027 HIOS Plan ID</i> field is disabled
	Continuing product; no silver plan available in the particular service area under that product; enrollment in a silver plan under a different product	Plan ID with different product ID from PY2027 plan ID
	Discontinuing product; no enrollment option	<i>PY2027 HIOS Plan ID</i> field is disabled
	Discontinuing product; enrollment into a different product	Plan ID with different product ID from PY2026 plan ID

Crosswalk Level	Crosswalk Reason	2027 HIOS Plan ID
Discontinue with no crosswalk	Discontinuing product; no enrollment option	<i>PY2027 HIOS Plan ID</i> field is disabled
	Continuing product; no plan available in the particular service area under that product; no enrollment option	<i>PY2027 HIOS Plan ID</i> field is disabled
Plan withdrawn prior to certification	Plan suppressed; no enrollment option	<i>PY2027 HIOS Plan ID</i> field is disabled

After completing the Plan ID Crosswalk Template, issuers must validate, finalize, and upload it into the MPMS Module for further validation.

Template Validation	Step Description
Validate Template	Click Validate on the <i>2026 Plan Crosswalk</i> tab. The validation process identifies any data issues that need to be resolved. If no errors are identified, finalize the template.
Validation Report	If the template has any errors, a Validation Report will appear in a pop-up box showing the reason for and cell location of each error. Correct any identified errors and click Validate again. Repeat until all errors are resolved.
Finalize Template	Click Finalize on the <i>2026 Plan Crosswalk</i> tab to create the .XML version of the template that will be uploaded to the Plan Validation Workspace in the MPMS Module.
Save Template	Save the .XML template. CMS recommends saving the validated template as a standard Excel .XLSM file in the same folder as the finalized .XML file for easier reference.
Upload and Link Template	Upload the saved .XML file to the Plan Validation Workspace in the MPMS Module and link the validated template to the issuer's application. Refer to the MPMS User Guide for details on how to complete these steps.

Issuers must submit their Plan ID Crosswalk Templates, justifications (if necessary), and state authorization via the MPMS Module. The [MPMS User Guide](#) contains detailed instructions on how to use the Plan Validation Workspace, complete the sections of an application, and submit the application.

This concludes the Plan ID Crosswalk section of the QHP Application Instructions.