

# Qualified Health Plan Issuer Application Instructions

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Plan Year 2025

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

## Section 2K: Plan ID Crosswalk

### 1. Introduction

The Plan ID Crosswalk Template crosswalks PY2024 qualified health plan (QHP) plan ID and service area combinations to PY2025 QHP plan IDs. These data facilitate enrollment transactions from the Centers for Medicare & Medicaid Services (CMS) for enrollees in the Individual Market who did not actively select a different QHP during Open Enrollment. These instructions apply to QHP and stand-alone dental plan (SADP) issuers that offered Individual Market plans on the Exchange during PY2024.

The instructions for this section are the same for the following issuer types:

- HIOS
- SERFF
- SADP

See Appendix D for additional information.

### 2. Data Requirements

To complete this section, the following are needed:

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 2025

- ◆ Issuers must submit their Plan ID Crosswalk Templates, necessary justifications, and state authorization in the Marketplace Plan Management System (MPMS) instead of the Plan Management (PM) Community.
- ◆ In MPMS, 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.

#### Tips for the Plan ID Crosswalk Section

- ◆ Submit the Plan ID Crosswalk Template, justifications, and state authorization in MPMS. Submit separate Plan ID Crosswalk templates in MPMS for SADPs.
- ◆ New issuers are not required to submit Plan ID Crosswalk Templates to complete their application unless they will receive plans from a discontinuing issuer, which is a rare situation.
- ◆ Issuers are required to provide age off plans for catastrophic and child only plans.
- ◆ CMS has deferred the Federally-facilitated Small Business Health Options Program's (FF-SHOP's) ability to auto-renew employees for PY2025. Do not submit a Plan ID Crosswalk Template for FF-SHOP plans.
- ◆ The 2024 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 take into account network ID when selecting crosswalk plans, if possible, along with product ID and plan type as has been required in prior years.<sup>1</sup>

#### Additional Resources

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

<sup>1</sup> For a complete list of plan crosswalk rules, see [45 CFR 155.335\(j\)](#).

## Additional Resources

- ◆ There are [templates](#) for this section.

### 4. Detailed Section Instructions

The issuer must submit evidence that its state has authorized the issuer to submit their Plan ID Crosswalk Template no later than the deadline for the initial application submission. Evidence of state authorization, such as a signed State Authorization form or an email confirmation, must be submitted in MPMS along with the completed template.

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

CMS does not send Plan ID Crosswalk Templates to states, but state regulators may 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 to CMS's Compliance and Enforcement Division ([formfiling@cms.hhs.gov](mailto:formfiling@cms.hhs.gov)) to obtain the necessary authorization for submission.

In MPMS, 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 to complete their application unless they will receive plans from a discontinuing issuer, which is a rare situation.

The following steps outline how to complete the Plan ID Crosswalk Template, beginning with the *2024 Plan Crosswalk* tab.

2024 Plan Crosswalk Tab	Steps
Import 2024 Plans & Benefits and Service Area Template	<p>Note: A prepopulated Plan ID Crosswalk Template generated in MPMS will import the issuer's plan IDs and associated service areas and network IDs from PY2024. Refer to the MPMS User Guide for details on how to generate a prepopulated Plan ID Crosswalk Template in MPMS.</p> <p>Issuers that would like to manually import PY2024 data should follow these instructions: Click <b>Import 2024 Plans &amp; Benefits and Service Area Template</b> to import the completed templates.</p> <p>The template will prompt the user to select the completed 2024 Plans &amp; Benefits and Service Area Templates. Before these templates are imported, save them in the same folder; both must be uploaded at the same time. To select both files, click one template, then press and hold <b>Ctrl</b> on Windows or <b>Cmd</b> on macOS while clicking on the other template, and then click <b>Open</b>. Select exactly one of each type of template.</p> <p>The Plan ID Crosswalk Template will populate a list of PY2024 plan IDs and their associated service areas and network IDs on the <i>2024 Plan and Service Area Data</i> tab. Review this tab to ensure the data were accurately imported. After the PY2024 plan and service area data have been imported, the <i>2024 Plan Crosswalk</i> tab will be populated with all applicable issuer information and with a row for each PY2024 plan ID.</p>
HIOS Issuer ID	Ensure the template has accurately populated the five-digit HIOS Issuer ID.
Issuer State	Ensure the template has accurately populated the state where the issuer is offering coverage.

2024 Plan Crosswalk Tab	Steps
Market Coverage	<p>Ensure the template has accurately populated the market coverage from the drop-down menu.</p> <p>The FF-SHOP Exchange will not allow auto-renewals for PY2024, so this field will be hard coded to <b>Individual</b>.</p>
Dental Only	<p>Ensure the template accurately indicates whether this Plan ID Crosswalk Template is for dental-only plans. Choose from the following:</p> <ul style="list-style-type: none"> <li>◆ <b>Yes</b>—this template is for SADPs only.</li> <li>◆ <b>No</b>—this template is for QHPs.</li> </ul>
Crosswalk Level	<p>Select the level at which the user would like to crosswalk each PY2024 plan from the drop-down menu. Choose from the following:</p> <ul style="list-style-type: none"> <li>◆ <b>Crosswalking to the same plan ID:</b> Select this option if the issuer is crosswalking the PY2024 plan to the same plan ID for PY2025 and there are no service area changes.</li> <li>◆ <b>Crosswalking at the plan ID level:</b> Select this option if the issuer has no service area changes but is using a different PY2025 plan ID to reflect the same plan.</li> <li>◆ <b>Crosswalking at the plan ID and county coverage level:</b> Select this option if the issuer’s service area changed for the upcoming year and the PY2024 plan needs to be crosswalked to two or more PY2025 plan IDs.</li> </ul> <p>Note: If the PY2024 plan covered the entire state, the plan must be crosswalked to PY2025 plan IDs for every county in the state.</p> <ul style="list-style-type: none"> <li>◆ <b>Crosswalking at the ZIP Code level for one or more counties:</b> Select this option if the service area changed for the upcoming year and the PY2024 plan needs to be crosswalked to two or more PY2025 plan IDs for the same county. Selecting this option will require the issuer to select the counties from the PY2024 plan’s service area that will be crosswalked at the ZIP Code level. The remaining PY2024 service area will be crosswalked at the county level.</li> </ul> <p>Note: Do not crosswalk at the ZIP Code level unless absolutely necessary.</p> <ul style="list-style-type: none"> <li>◆ <b>Discontinue with no crosswalk:</b> Select this option if a PY2024 plan is being discontinued with no re-enrollment option for its enrollees.</li> <li>◆ <b>Plan withdrawn prior to certification:</b> Select this option if the PY2024 plan was withdrawn from the Exchange before certification and has no enrollment. The issuer should also select this option if the PY2024 plan ID listed on the template was not approved by the state or the Federally-facilitated Exchange (FFE) to be offered on the Exchange in PY2025.</li> </ul>
Counties Crosswalked at ZIP Code Level	<p>Select the counties in the PY2024 plan’s service area that will be crosswalked at the ZIP Code level from the pop-up menu.</p>

To complete the information on the *2025 Plan Crosswalk* tab, follow the steps in the table below.

2025 Plan Crosswalk Tab	Steps
Create “2025 Crosswalk Tab”	<p>Click <b>Create “2025 Crosswalk Tab.”</b> This action creates the <i>2025 Plan Crosswalk</i> tab. The first four columns, 2024 HIOS Plan ID, County Name, Service Area ZIP Codes, and Crosswalk Level, and the last column, 2024 Network ID, will be auto-populated based on the issuer’s entries in the <i>2024 Plan Crosswalk</i> tab. If the issuer crosswalks at the plan ID, county level for one or more plans, a row will appear for each county that plan covered in PY2024. If the issuer decides to crosswalk at the ZIP Code level for specific counties covered by a PY2024 plan, a row will appear for each combination of plan ID, county, and ZIP Code.</p> <p>Issuers should click <b>Create “2025 Crosswalk Tab”</b> only when certain that the <i>2024 Plan Crosswalk</i> tab is complete. A <i>2025 Plan Crosswalk</i> tab cannot be changed after it is created. To make changes, issuers must click <b>Create “2025 Crosswalk Tab”</b> again, which will clear all data and begin a new copy of the <i>2025 Plan Crosswalk</i> tab. Issuers</p>

2025 Plan Crosswalk Tab	Steps
	<p>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>2025 Plan Crosswalk</i> tab.</p>
Crosswalk Reason	<p>Choose the reason for the crosswalk from the drop-down menu. Certain options will only be available for specific crosswalk levels. Table 2K-1 details crosswalk reason entries for each crosswalk level:</p> <ul style="list-style-type: none"> <li>◆ <b>Renewing exact same product/plan combination (same PY2024 plan ID):</b> Select this option if the issuer is crosswalking this plan ID/service area to the exact same HIOS Plan ID. The template will auto-populate the <i>PY2025 Plan ID</i> field with the PY2024 plan ID. Use the same HIOS Plan ID if the same plan was offered the previous plan year and remains available for the upcoming 2025 plan year. The issuer must comply with the “same plan” standards as defined in 45 CFR 144.103.</li> <li>◆ <b>Renewing exact same product/plan combination (different PY2025 plan ID):</b> Select this option if the issuer is crosswalking this plan ID/service area to the same product/plan combination but with a different PY2025 plan ID. If possible, the issuer should use the same HIOS Plan ID if the previous year’s same plan ID/service area combination remains available. If the issuer is continuing a plan but wishes to crosswalk to a different HIOS Plan ID, the issuer must obtain approval from their state regulatory authority before submitting the Plan ID Crosswalk Template. The issuer must comply with the “same plan” standards as defined in 45 CFR 144.103.</li> <li>◆ <b>Renewing product: renewal in a different plan within product:</b> Select this option if the issuer is renewing this product, but crosswalking this plan ID/service area to a different plan within the product offered on the FFE. If the issuer selects this option, the same product ID that is embedded in the plan’s 2024 plan ID must be used.</li> <li>◆ <b>Continuing product: no plan available in the particular service area under that product; enrollment in a different product:</b> Select this option if the issuer is continuing this product in PY2025 but will no longer offer any plans in part of the service area covered by the product in PY2024 and is crosswalking to a plan within a different product offered on the FFE. Select this reason for the portion of the service area where the issuer no longer offers any plans under that product. If the issuer selects this option, the PY2024 plan ID must be crosswalked to a PY2025 plan ID with a different product ID.</li> <li>◆ <b>Continuing product: no plan available in the particular service area under that product; no enrollment option:</b> Select this option if the issuer is continuing a PY2024 product, but there is 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>2025 HIOS Plan ID</i> field.</li> <li>◆ <b>Continuing product: no silver plan available in the particular service area under that product, enrollment in a silver plan under a different product:</b> Select this option if there is no available silver plan within the enrollee’s product in a particular service area and the enrollee is being enrolled in a silver plan within another product.</li> <li>◆ <b>Discontinuing product: enrollment into a different product:</b> Select this option if this PY2024 product is discontinued for PY2025 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 PY2025 plan ID must have a different product ID, and the issuer may not enter the discontinued PY2024 product ID for any other row under the PY2025 plan ID. Crosswalk any discontinued PY2024 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 the issuer does not provide a crosswalk for a discontinued plan but still offers products in the same service areas, CMS will crosswalk the discontinued plan to another product the issuer offers under the same HIOS Issuer ID.</li> <li>◆ <b>Discontinuing product: no enrollment option:</b> Select this option if a PY2024 product is discontinued for PY2025 and there is no enrollment option on the FFE for PY2024 enrollees in this plan ID/service area combination. Do not enroll pertinent</li> </ul>

2025 Plan Crosswalk Tab	Steps
	plans into a plan offered off the Exchange. Selecting this option will disable the <i>PY2025 Plan ID</i> field. Under this option, the issuer may not enter the discontinued PY2024 product ID for any other row under the PY2024 plan ID. The issuer should crosswalk any discontinued PY2024 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 the issuer does not provide a crosswalk for a discontinued plan but still offers products in the same service areas, CMS will crosswalk the discontinued plan to another product the issuer offers under the same HIOS Issuer ID.
2025 HIOS Plan ID	Enter the PY2025 plan ID the issuer would like to crosswalk their enrollees to for the row's PY2024 plan ID/service area. This field will be auto-populated when <b>Renewing exact same product/plan combination (Same 2024 Plan ID)</b> is chosen under <i>Crosswalk Reason</i> . This field will be disabled when <b>Discontinuing product; no enrollment option</b> or <b>Continuing product; no plan available in the particular service area under that product; no enrollment option</b> are chosen under <i>Crosswalk Reason</i> .  Note: Only enter PY2025 plan IDs for plans that will be offered on the Exchange and are listed in the 2025 QHP Application. CMS will not accept any PY2025 plan IDs for plans only sold off the Exchange.
Is this PY2025 Plan a Catastrophic or Child-Only Plan?	This field will default to <b>No</b> . Please select <b>Yes</b> if the issuer is crosswalking a catastrophic or child-only plan.
PY2025 Plan ID for Enrollees Aging off Catastrophic or Child-Only Plan	If the issuer responds <b>Yes</b> to <b>Is this PY2025 Plan a Catastrophic or Child-Only Plan?</b> , this field will allow the issuer to enter a PY2025 plan ID. Enrollees who no longer meet the criteria for continued eligibility in these plans will be crosswalked to the PY2025 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"> <li>◆ <b>PY2024 Plan ID</b>—Associated Policy Form numbers and NAIC SERFF tracking numbers for Form Filings.</li> <li>◆ <b>PY2025 Plan ID</b>—Associated Policy Form numbers and NAIC SERFF tracking numbers for Form Filings.</li> <li>◆ <b>PY2025/23 Plan ID (catastrophic or child-only)</b>—Associated Policy Form numbers and NAIC SERFF tracking numbers for Form Filings.</li> </ul>

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

**Figure 2K-1. Sample Plan ID Crosswalk Template**

Plan Crosswalk Template v14.0

Issuer Information	
HIOS Issuer ID	12345
Issuer State	AK
Market Coverage	Individual
Dental Only Plan	No

2024 HIOS Plan ID (Standard Component)	Crosswalk Level	Counties Crosswalked at Zip Level
Required	Required: Indicate whether you would like to crosswalk your 2024 to 2025 Plan IDs at the plan, county or zip code level.	Required if user indicates Crosswalked at the Zip Level for one or more counties.
12345AK0100001	Crosswalking to same Plan ID	
12345AK0100002	Crosswalking at the Plan ID and county coverage level	

**Actions**

- Import 2024 Plans & Benefits Template and Service Area Template**  
Please save your completed 2024 Plans & Benefits Template and Service Area Template to a folder on your harddrive and then select the button below to import the data.
- Create "2025 Crosswalk Tab"**  
Select the button below to create the 2025 Crosswalk Tab based upon your entry.
- Validate Data**  
Select the button below to validate information entered into all tabs. *Warning: Depending on 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 PY2025 plan ID entry options for each crosswalk level.

**Table 2K-1. Crosswalk Level, Reason for Crosswalk, and PY2025 Plan ID Entry Options**

<b>Crosswalk Level</b>	<b>Crosswalk Reason</b>	<b>2025 HIOS Plan ID</b>
Crosswalking to same plan ID	Renewing exact same product/plan combination (auto-populated) (same PY2024 plan ID)	Template auto-populates field with PY2024 plan ID
Crosswalking at the plan ID level	Renewing exact same product/plan combination (different PY2025 plan ID)	Different plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same product ID as PY2024 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 PY2024 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 PY2025 plan ID
	Discontinuing product; enrollment into a different product	Plan ID with different product ID from PY2024 plan ID
Crosswalking at the plan ID and county coverage level	Renewing exact same product/plan combination (same PY2024 plan ID)	Template auto-populates field with PY2024 plan ID
	Renewing exact same product/plan combination. (different PY2025 plan ID)	Different plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same product ID as PY2024 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 PY2024 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 PY2025 plan ID
	Continuing product; no plan available in the particular service area under that product; no enrollment option	<i>PY2025 HIOS Plan ID</i> field is disabled
	Discontinuing product; enrollment into a different product	Plan ID with different product ID from PY2024 plan ID
	Discontinuing product; no enrollment option	<i>PY2025 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 PY2024 plan ID)	Template populates field with PY2024 plan ID
	Renewing exact same product/plan combination (different PY2025 plan ID)	Different plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same product ID as PY2024 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 PY2024 plan ID
	Continuing product; no plan available in the particular service area under that product; no enrollment option	<i>PY2025 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 PY2025 plan ID
	Discontinuing product; no enrollment option	<i>PY2025 HIOS Plan ID</i> field is disabled

Crosswalk Level	Crosswalk Reason	2025 HIOS Plan ID
	Discontinuing product; enrollment into a different product	Plan ID with different product ID from PY2024 plan ID
Discontinue with no crosswalk	Discontinuing product; no enrollment option	<i>PY2025 HIOS Plan ID</i> field is disabled
	Continuing product; no plan available in the particular service area under that product; no enrollment option	<i>PY2025 HIOS Plan ID</i> field is disabled
Plan withdrawn prior to certification	Plan suppressed; no enrollment option	<i>PY2025 HIOS Plan ID</i> field is disabled

Once the Plan ID Crosswalk Template is completed, it must be validated, finalized, and uploaded to MPMS for further validation.

Template Validation	Steps
Validate Template	Click <b>Validate</b> on the <i>2025 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 <b>Validate</b> again. Repeat until all errors are resolved.
Finalize Template	Click <b>Finalize</b> on the <i>2025 Plan Crosswalk</i> tab to create the .XML version of the template you will upload in MPMS.
Save Template	<b>Save</b> the .XML template. CMS recommends issuers save the validated template as a standard Excel .XLSM file in the same folder as the finalized .XML file for easier reference.
Upload Template	Upload the completed template to the Plan Validation Workspace in MPMS.

The issuer must submit their Plan ID Crosswalk Templates, justifications (if necessary), and state authorization via MPMS. Detailed instructions on how to use the Plan Validation Workspace, complete the sections of an application, and submit the application can be found in the [MPMS User Guide](#).

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