

# CMS Issuer Technical Work Group

- ***Housekeeping***
  - ***Reminder: New Enrollment***
  - ***Webinar Schedule***
    - ***Registration Reminders:  
New Tuesday and Thursday  
Issuer Workgroup Calls***
  - ***Reminders: CMS Issuer  
Communications***
- ***Pre-Audit and Recon Update***
- ***ERR***
- ***Enhanced Direct Enrollment (EDE) Updates:  
Compliance Team***
- ***Enhanced Direct Enrollment (EDE) Updates:  
Enrollment Team***

- ***Q&A***

***March 31, 2020***

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

# New 2020 Series for the CMS Issuer Technical Workgroup Call (Series I) and the Thursday Recon IC834 Workgroup

- The Tuesday Issuer Technical Workgroup started a new series on today Tuesday, January 7, 2020 at 3:00 PM EST.
- The Thursday Recon-IC834 Workgroup call started a new series on this Thursday, January 9, 2020

Please see the registration URLs for both calls below:

- Tuesday Issuer Technical Workgroup Call  
[letsmeet.webex.com/letsmeet/k2/j.php?MTID=t01b9595808d2c0225f5bbe4308047786](https://letsmeet.webex.com/letsmeet/k2/j.php?MTID=t01b9595808d2c0225f5bbe4308047786)
- Thursday Recon IC834 Workgroup Call  
<https://letsmeet.webex.com/letsmeet/k2/j.php?MTID=tf57cab5409c2b02cd5ea749302c3014a>
  - You will register one time, for the entire Tuesday Issuer Technical Workgroup Call Series I (through, July 28, 2020) and the Thursday Recon-IC834 Workgroup Series (through July 30, 2020)  
Once the host approves your registration, you will receive a confirmation email with instructions for joining the session.
  - Subsequently, registration information for both the Tuesday Issuer Technical Workgroup call will be sent in our daily CMS Issuer Communication blast messages.

Note: CMS will continue to keep call participants informed of any further changes of the Cisco Web-EX platform.

# April 2020

| Sun | Mon                                                                      | Tues                                                   | Wed | Thurs                                                               | Fri | Sat |
|-----|--------------------------------------------------------------------------|--------------------------------------------------------|-----|---------------------------------------------------------------------|-----|-----|
| 29  | 30<br>CCIO Enrollment<br>(Adhoc) Webinar(Policy<br>Focus) 12:00pm-1:00pm | 31<br>CMS Issuer Technical<br>Workgroup<br>3:00pm-4:30 | 01  | 02                                                                  | 03  | 04  |
| 05  | 06<br>CCIO Enrollment<br>Webinar(Policy Focus)<br>12:00pm-1:00pm         | 07<br>CMS Issuer Technical<br>Workgroup<br>3:00pm-4:30 | 08  | 09<br>Data Recon &<br>Inbound 834/BAA<br>Workgroup 12:30-<br>1:30pm | 10  | 11  |
| 12  | 13                                                                       | 14<br>CMS Issuer Technical<br>Workgroup<br>3:00pm-4:30 | 15  | 16<br>Data Recon & Inbound<br>834/BAA Workgroup<br>12:30-1:30pm     | 17  | 18  |
| 19  | 20<br>CCIO Enrollment<br>Webinar(Policy Focus)<br>12:00pm-1:00pm         | 21<br>CMS Issuer Technical<br>Workgroup<br>3:00pm-4:30 | 22  | 23<br>Data Recon & Inbound<br>834/BAA Workgroup<br>12:30- 1:30pm    | 24  | 25  |
| 26  | 27                                                                       | 28<br>CMS Issuer Technical<br>Workgroup<br>3:00pm-4:30 | 29  | 30<br>Data Recon &<br>Inbound 834/BAA<br>Workgroup 12:30-<br>1:30pm | 01  | 02  |

# CMS ISSUER COMMUNICATIONS

CMS uses a mass communications tool to distribute notices and general communications to issuers regarding topics such as *Enrollment Pre-Audit files; Enrolment Reconciliation Files; Open Enrollment Activities; IC834 Activities ( Specifically Processing schedules, delays in processing or reporting), other alerts AND*

Daily UAT status

If you are not receiving these email communications:

1. To immediately see what message was blasted out, **you can access the daily CMS Issuer Communications on CMSzONE at:** <https://zone.cms.gov/community/issuer-community-private>
2. Contact the [CMS\\_Issuer\\_Communications@cms.hhs.gov](mailto:CMS_Issuer_Communications@cms.hhs.gov) and confirm if you are listed as a point of contact (POC) for these communications for your organization.
  - » If you are not listed as a POC please see page 2 of this deck for instructions on being added. If you are a POC please proceed to the next step.
3. CMS recommends the applicable IP addresses (found at the urls below) are whitelisted. CMS recommends users work with their organization's IT support staff to whitelist both Salesforce's IP address as well as the relevant government ranges. More details are provided at the following resources\*:

[https://help.salesforce.com/articleView?id=000199327&language=en\\_US&type=1](https://help.salesforce.com/articleView?id=000199327&language=en_US&type=1)

[https://help.salesforce.com/apex/HTViewSolution?urlname=What-are-the-Salesforce-IP-Addresses-to-whitelist&language=en\\_US](https://help.salesforce.com/apex/HTViewSolution?urlname=What-are-the-Salesforce-IP-Addresses-to-whitelist&language=en_US)

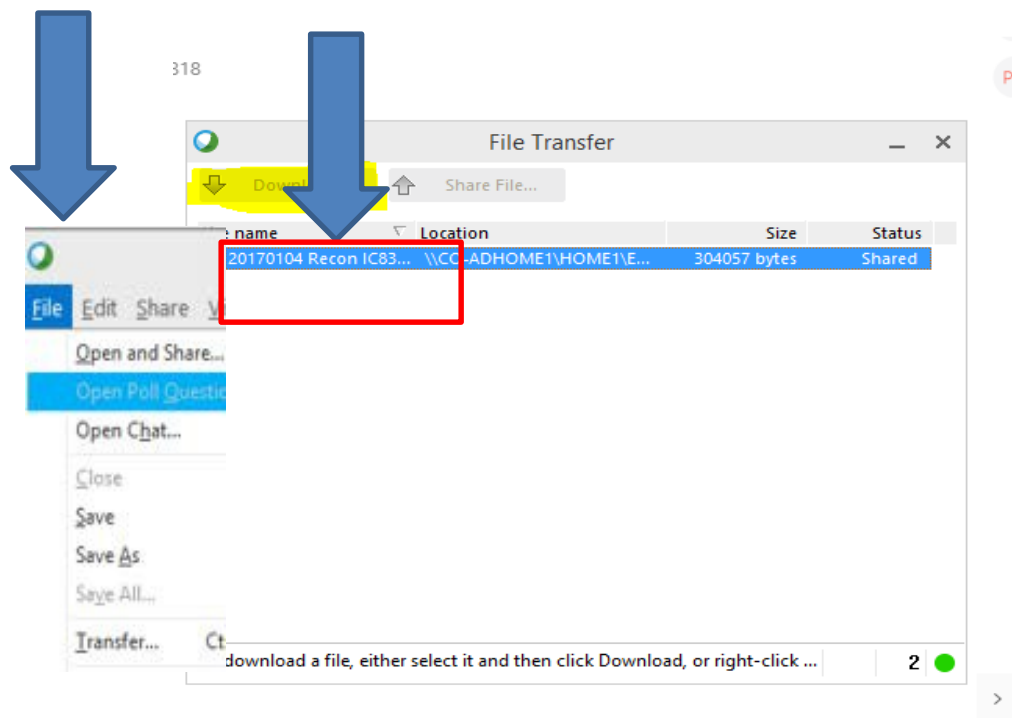
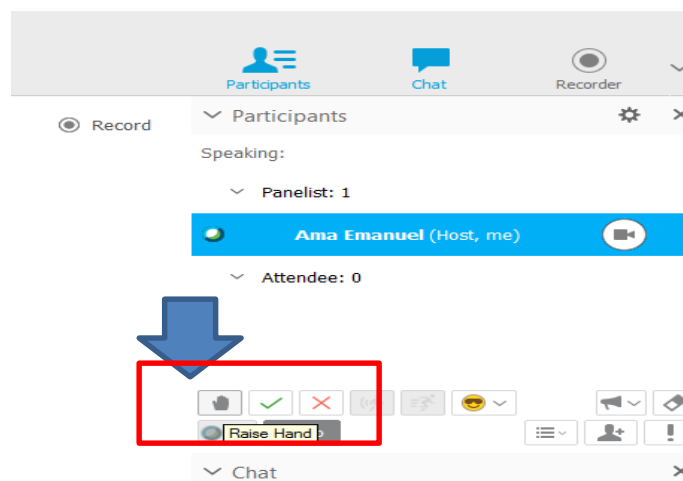
\* There are some Issuers/DE Partners that may still experiencing problems after whitelisting. This is a known issue and we will report out once the issue is resolved.

If you have any further questions please contact the CMS FEPS Help Desk at: [CMS\\_Issuer\\_communication@cms.hhs.gov](mailto:CMS_Issuer_communication@cms.hhs.gov)

# Asking a Question/Downloading the Meeting pdf slides in the Web-Ex Platform

To ask a question, please select the raised hand icon at the start of Q&A session. It is the icon at the bottom of the participant list. Please deselect by clicking on the hand again. This would apply whether you no longer have a verbal question or once our question is answered.

To download the pdf version of today's deck, open the "File Transfer" box on your screen. If not, please select "File, then "Transfer" and "Download" (as captured below.) The "Download" button will be grey.



# Access to CMSzONE & the Private Issuer Community

## User Access Quick Guide

A copy of the comprehensive User Access Quick Guide is posted on zONE @:

<https://zone.cms.gov/document/zone-access-troubleshooting> (pre-log in required to access zONE links)

### Three audiences:

1. **New Users** (new to zONE & EIDM)
2. **Existing EIDM Users** (new user to zONE)
3. **Existing zONE Users** (unable to log-in since the EIDM transition)

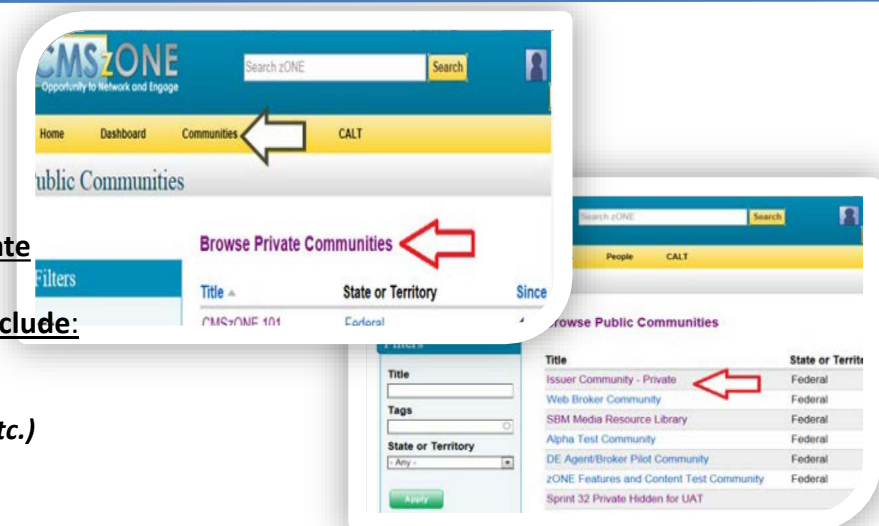
## EIDM Registration Process: (Pre-requisite to CMSzONE Access)

1. Register for access at EIDM Enterprise Portal Here: <https://portal.cms.gov/>
2. Log in with your EIDM credentials and click on “Request Access Now”
3. Click on “Request New Access” and choose CMSzONE

## CMSzONE Private Issuer Community

### Access: (After being granted EIDM access)

1. Log into zONE; click on the **Communities tab**
2. Click **Browse Private Communities** Click **Issuer Community – Private**
3. Click **Join Community**
4. Provide explanation of why you need access to this community; **Include:**
5.
  - name and contact information
  - issuer POC contacts
  - specific work for issuer (i.e. fill out QHP templates, processing 834's, etc.)



# Troubleshooting access to CMSzONE

## REGISTRATION, PASSWORD RESETS, & FORGOTTEN PASSWORDS

- **New Users:** Registration & community approval are typically completed in 1-3 business days, if not sooner.

If you are unable to access zONE, and/or the issuer community after 3 business days you may email a follow up request to the helpdesk & the issuer communications team (addresses below) for an update. Please include any provided ticket numbers & applicable context for reference.

- **Existing zONE Users :** Password resets are also typically completed in 1-3 business days, if not sooner.

If your request is not completed after 3 business days, you may email a follow up request to the helpdesk & the issuer communications team (addresses below) for an update. Please include any provided ticket numbers & applicable context for reference.

## ALL OTHER CMSzONE ACCESS ISSUES

### Prerequisite Details

- **Capture screenshots of any errors received so our teams can troubleshoot**

☐ PC = Ctrl + PrtScn to capture, Ctrl + V to paste / Mac = Command+Shift+4 to capture & send to a desktop file

### Email

- **Provide screenshots and applicable prerequisite information above, in an email body, as follows:**

- ❖ With the subject line: **“zONE Access Issues”**
- ❖ To: [CMS\\_FEPS@cms.hhs.gov](mailto:CMS_FEPS@cms.hhs.gov)
- ❖ Cc: or Bcc: [CMS\\_Issuer\\_Communications@cms.hhs.gov](mailto:CMS_Issuer_Communications@cms.hhs.gov)

### **Reminder: Supported Browser Versions**

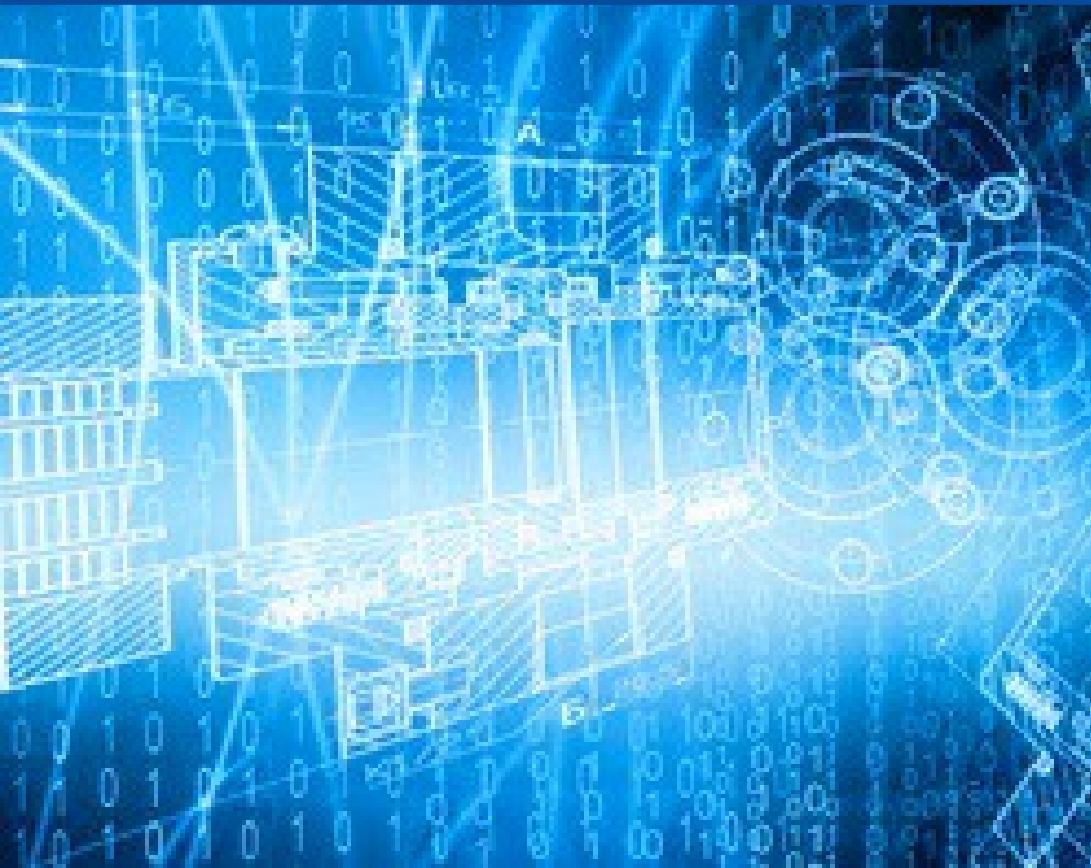
- ✓ Internet Explorer Version 9.0
- ✓ Internet Explore Version 10.0
- ✓ Google Chrome
- ✓ Safari

### Follow-Up

- **If the issue is not resolved within 3 business days, you may email a follow up request:**

- ❖ With the subject line: **“zONE Access Issues : 3+day follow up”**
- ❖ To: [CMS\\_FEPS@cms.hhs.gov](mailto:CMS_FEPS@cms.hhs.gov) & [CMS\\_Issuer\\_Communications@cms.hhs.gov](mailto:CMS_Issuer_Communications@cms.hhs.gov)
- ❖ Include (where possible) explanation message, screenshots, ticket #(s) received, and number of days outstanding

# Housekeeping: Enrollment Pre-Audit & Reconciliation



## *Enrollment Pre-Audit & Reconciliation*

**Tuesday, March 31, 2020**

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:  
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

# Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2019)**
  - 1095-A Consumer-Initiated Dispute Update (1095Ax) Files are scheduled for distribution to Issuers tomorrow, Wednesday, April 1<sup>st</sup>
  - The next set of 1095Ax Files are scheduled for distribution to Issuers on Wednesday, April 15<sup>th</sup>
- **Plan Year 2016**
  - An incremental 2016 FFM extract is scheduled for Monday, April 13<sup>th</sup> at 6PM EDT
  - Incremental 2016 Pre-Audit (ISIPA6) Files based upon that extract are scheduled for delivery to Issuers on Wednesday, April 15<sup>th</sup>
- **Plan Year 2017**
  - Next month's 2017 FFM extract is scheduled for Wednesday, April 15<sup>th</sup> at 6PM EDT
  - Incremental 2017 Pre-Audit (ISIPA7) Files based upon that extract are scheduled for delivery to Issuers on Monday, April 20<sup>th</sup>

# Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2018**

- Next month's 2018 FFM extract is scheduled for Wednesday, April 15<sup>th</sup> at 6PM EDT
- Comprehensive 2018 Pre-Audit (AUD8) Files based upon that extract are scheduled for delivery to Issuers on Monday, April 20<sup>th</sup>

- **Plan Year 2019**

- Next month's 2019 FFM extract is scheduled for Wednesday, April 15<sup>th</sup> at 6PM EDT
- Comprehensive 2019 Pre-Audit (AUD9) Files based upon that extract are scheduled for delivery to Issuers on Friday, April 17<sup>th</sup>

# Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2020**

- The RCNIO submission deadline for March's Run 4 was last Thursday, March 26<sup>th</sup> at 3PM EST
  - RCNO0 Files are being distributed to Issuers today, Tuesday, March 31<sup>st</sup>
- Next month's 2020 FFM extract is scheduled for Wednesday, April 15<sup>th</sup> at 6PM EDT
- Comprehensive 2020 Pre-Audit (AUD0) Files based upon that extract are scheduled for delivery to Issuers on Friday, April 17<sup>th</sup>
- The RCNIO submission deadline for April's Run 5 is Thursday, April 23<sup>rd</sup> at 3PM EDT

# Updates on Cancel/Term Reason Codes in Recon

- CMS has decided to postpone full implementation of Cancellation and Termination Reason Codes in Enrollment Reconciliation
  - CMS was targeting June 2020 for full implementation, including application of Issuer-supplied reason codes to FFM data and suppression of cancellations and terminations submitted incorrectly
  - CMS will postpone this full implementation until at least **Fall 2020** to allow Issuers additional time to improve data quality and avoid suppression of a high number of updates through reconciliation
- **Issuer Feedback Requested:** CMS is interested in any operational challenges impacting an Issuer's ability to accurately submit these reason codes in monthly reconciliation
  - To share any feedback on cancellation and termination reason codes with CMS, please send an e-mail to [recon\\_issuer\\_support@bah.com](mailto:recon_issuer_support@bah.com) with the subject line "REASON CODE FEEDBACK"
  - CMS will consider all feedback to determine if further accommodations or adjustments to business rules can be made to facilitate Issuer compliance with recon requirements

# ER&R



- ✓ *Topics*
  - ✓ Retroactive Start Date Issue
- ✓ *Q&A*

*March 31, 2020*

# Retroactive Start Date Issue

- ER&R frequently receive HICS cases from issuers requesting changes to a segment that should be addressed by cancelling the segment and adjusting the subsequent segment's start date.
- In this example, an issuer is attempting to add a new member and change the premium value for the initial segment.

| Segment   | FFM First Name | ISSUER First Name | FFM Relationship | ISSUER Relationship | FFM Start Date | ISSUER Start Date | FFM End Date | ISSUER End Date | FFM Total Prem | ISSUER Total Prem |
|-----------|----------------|-------------------|------------------|---------------------|----------------|-------------------|--------------|-----------------|----------------|-------------------|
| 123456789 |                | Ronan             |                  | 19                  |                | 2020-01-01        |              | 2020-01-31      |                |                   |
| 123456789 | Elora          | Elora             | 01               | 01                  | 2020-01-01     | 2020-01-01        | 2020-01-31   | 2020-01-31      | 700.00         | 1100.00           |
| 987654321 | Ronan          | Ronan             | 19               | 19                  | 2020-02-01     | 2020-02-01        | 2020-12-31   | 2020-12-31      |                |                   |
| 987654321 | Elora          | Elora             | 01               | 01                  | 2020-02-01     | 2020-02-01        | 2020-12-31   | 2020-12-31      | 1100.00        | 1100.00           |

- Because the second segment already contains the additional member and desired premium, this change should be handled by cancelling the initial segment and changing the second segment's Start Date to 01/01/2020.
- This scenario occurs with a variety of different updates, so issuers should always check to see if a change will result in a segment matching the existing values of another segment.
- Issuers who submit HICS cases directly to ER&R will receive disposition code FR49 when disputing a financial value that should be addressed by modifying the Benefit Start Date and/or Benefit End Date.

# ER&R Topics



✓ *Topics*

✓ *Q&A*

***March 31, 2020***

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:  
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

# EDE Guidelines Deep Dive: Compliance Team



*Tuesday, March 31, 2020*

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:  
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

# EDE Guidelines Discussion Agenda

- Introduction
- Key Terminology
- Reminder: SEP, CiCs, and Enrollment Groups
- Primary EDE Entities and Upstream EDE Entity Arrangements
- Primary EDE Entities and Downstream Agent and Broker Arrangements
- Agent and Broker Identity Proofing Verification
- Notable Updates
- Auditor and EDE Entity Training Requirements
- Audit Completeness Requirements

# Introduction

- The updated *Third-party Auditor Operational Readiness Reviews for the Enhanced Direct Enrollment Pathway and Related Oversight Requirements*, can be found here: <https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Guidelines-for-Third-Party-Auditors-EDE-PY20PY21-Year3.pdf>.
- It is important for prospective and existing EDE Entities and Auditors to review the entire document because CMS has made updates throughout.

# Key Terminology

- **Overall EDE end-user experience:** All aspects of the pre-application, application, plan shopping, plan selection, enrollment, and post-enrollment experience and any data collected necessary for those steps or for the purposes of any Authorized Functions.
- **White-label issuer; hybrid issuer; hybrid, non-issuer** upstream EDE Entities (see slide 6)

## Reminder: SEP, CiCs, and Enrollment Groups—Section IV.a

- All EDE Entities, regardless of the phase chosen, are required to support consumer-reported changes in circumstances (CiCs) and special enrollment periods (SEPs) during and outside of the OEP.
- In addition, they are required to support re-enrollment application activities for any such actions that fall within the scenarios supported by the EDE Entity's chosen end-state phase.
- Furthermore, EDE Entities of all phases must support households that wish to enroll in more than one enrollment group.

# Primary EDE Entities and Upstream EDE Entity Arrangements— Section IV.b

- CMS provided detail on the types of primary and upstream relationships and the potential modifications to a primary EDE Entity's EDE environment for the following arrangements:
  - White-label Issuer Upstream EDE Entities: Minor branding and QHP display changes only
  - Hybrid Issuer Upstream EDE Entities: Additional functionality or systems to change the EDE end-user experience beyond branding or QHP display changes (e.g., an issuer-hosted QHP shopping experience added to the EDE end-user experience)
  - Hybrid, Non-Issuer Upstream EDE Entities: Additional functionality or systems to change the EDE end-user experience beyond minor branding changes.
- All relationships must be documented in the primary EDE Entity's ISA Appendix B.
- All upstreams must maintain a unique Partner ID, sign the EDE Business Agreement, and submit operational information.

# Primary EDE Entities and Downstream Agent and Broker Arrangements—Section IV.d

- CMS has clarified the permissible types of downstream agent and broker arrangements.
- Downstream agents and brokers: White-label arrangements where the primary EDE Entity enables minor branding changes.
- CMS clarified that a downstream agent or broker may use a secure redirect with a limited exchange of data from the agent's or broker's website to the primary EDE Entity environment in some circumstances without creating a hybrid, non-issuer upstream EDE Entity relationship.
- Any arrangement of this type must be defined in the primary EDE Entity's ISA Appendix B.
- Note: Classic DE web-brokers, as defined in 45 C.F.R. 155.20, will be classified as downstream agents and brokers in the context of EDE if they pursue this type of arrangement.

# Agent and Broker Identity Proofing Verification—Section VI

- CMS clarified existing requirements regarding the audit standards when an upstream EDE Entity implements some portion of the Agent and Broker Identity Proofing Verification requirement.
  - In such cases, the upstream EDE Entity would need to have a 3<sup>rd</sup>-party Auditor evaluate the upstream EDE Entity's implementation of its portion of the requirement.
  - If a primary EDE Entity is not offering a centralized, complete agent and broker identity proofing verification approach, each of its upstream EDE Entities must provide its third-party Auditor's findings to CMS (in the Business Audit Report template) prior to approval.
  - The upstream EDE Entity's third-party Auditor(s) would need to meet requirements related to selecting an auditor, for example, Section V and Section VIII.

# The Following Sections Include Notable Updates

- Post-eligibility Application Communications Requirements—Section VI
  - CMS has clarified and updated the Post-Eligibility Application Communications Requirements and these updates will be reflected in the forthcoming Communications Toolkit.
- API Functional Integration Requirements—Section VI
  - CMS has issued a new baseline API Functional Integration Toolkit (FIT). The API FIT contains new test cases to verify that an EDE Entity has integrated with all of the required EDE APIs.
- EDE Change Management Process Requirements—Section VI
  - CMS has issued a new requirement for the EDE Change Management process that the primary EDE Entity must implement
- UI Eligibility Technical Assistance Review Process Requirement—Section VI.b.ii
  - CMS has updated its testing environment credentials form to collect testing credentials for the application technical assistance process with the Eligibility team and the mini audit process with the compliance team.

# Auditor and EDE Entity Training Requirements –Section VIII

| EDE Topic                                                            | Purpose                                                                                                    | Year 2 and Year 3 Publication Dates | Business Auditor Training | Privacy and Security Auditor Training | Prospective Primary EDE Entity Training | Prospective Upstream EDE Entity Training | Existing Primary EDE Entity Training | Existing Upstream EDE Entity Training |
|----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|-------------------------------------|---------------------------|---------------------------------------|-----------------------------------------|------------------------------------------|--------------------------------------|---------------------------------------|
| A. Privacy and Security Standards                                    | To review the required privacy and security standards required of entities for participation in EDE.       | Year 2: 3/8/19                      | Not Required              | <b>*Required</b>                      | <b>*Required</b>                        | <b>*Required</b>                         | <b>*Required</b>                     | <b>*Required</b>                      |
|                                                                      |                                                                                                            | Year 3: Forthcoming                 | Not Required              | <b>Required</b>                       | <b>Required</b>                         | <b>Required</b>                          | <b>Required</b>                      | <b>Required</b>                       |
| B. Regulatory and Compliance Standards                               | To review the CMS policy guidance for EDE.                                                                 | Year 2: 4/1/19                      | <b>*Required</b>          | <b>*Required</b>                      | <b>*Required</b>                        | <b>*Required</b>                         | <b>*Required</b>                     | <b>*Required</b>                      |
|                                                                      |                                                                                                            | Year 3: Forthcoming                 | <b>Required</b>           | <b>Required</b>                       | <b>Required</b>                         | <b>Required</b>                          | <b>Required</b>                      | <b>Required</b>                       |
| C. Operational Readiness Review (ORR) and CMS Reporting Requirements | To review the ORR and related CMS Reporting Requirements that will assist in completing the ORR for EDE.   | Year 2: 3/22/19                     | <b>*Required</b>          | Not Required                          | <b>*Required</b>                        | <b>*Required</b>                         | <b>*Required</b>                     | <b>*Required</b>                      |
|                                                                      |                                                                                                            | Year 3: Forthcoming                 | <b>Required</b>           | Not Required                          | <b>Required</b>                         | <b>Required</b>                          | <b>Required</b>                      | <b>Required</b>                       |
| D. Application User Interface (UI) Overview                          | To review all aspects and features of the Application UI for EDE enrollments available for plan year 2020. | Year 2: 4/1/19                      | <b>*Required</b>          | Not Required                          | <b>*Required</b>                        | Not Required                             | Not Required                         | Not Required                          |
|                                                                      |                                                                                                            | Year 3: 3/3/20                      | <b>Required</b>           | Not Required                          | <b>Required</b>                         | Not Required                             | Not Required                         | Not Required                          |
| E. Non-Eligibility API Services                                      | To review all UI services offered by CMS.                                                                  | Year 2: 3/28/19                     | <b>*Required</b>          | Not Required                          | <b>*Required</b>                        | Not Required                             | Not Required                         | Not Required                          |
|                                                                      |                                                                                                            | Year 3: 3/3/20                      | <b>Required</b>           | Not Required                          | <b>Required</b>                         | Not Required                             | Not Required                         | Not Required                          |

\*Entities/Auditors must take the Year 3 trainings. If they choose to start the audit before the Year 3 trainings are released, the Year 2 trainings are required prior to starting the audit *and* the Year 3 trainings are required prior to submitting the audit. If they choose to start the audit once the Year 3 trainings are released, they are not required to take the Year 2 trainings. For existing Entities, they are required prior to agreement renewal. CMS may release additional information.

# Audit Completeness Requirements—Section X.C

- CMS has modified the overall completeness criteria for 2020 to incorporate the following requirements:
  - All required rows of the Toolkits must be completed
  - All required screenshots must be submitted to CMS and cannot contain obscured, cut-off, or missing content
  - Note: CMS-confirmed Exchange defects will not count against a prospective EDE Entity's audit submission
- For the Eligibility Results Toolkit:
  - CMS requires screenshots of the entire application flow beginning with items at the start of the Application UI Toolkit through the eligibility results page
  - CMS will review for correct eligibility results for specific elements on both the EDN and the eligibility results page
  - For each test case, the Auditor must provide the raw JSON from the Get App API response for the application version used to complete the scenario

# Upcoming UAT0 Downtime – Data Services Hub (DSH) Patching



***Tuesday, March 31, 2020***

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:  
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

# Upcoming UAT0 Downtime – Data Services Hub (DSH) Patching

- Partners, please be advised that UAT0 will be unavailable for testing on 4/2, starting at 9:00 PM ET
  - DSH patching will start at this time
  - The patching is expected to be completed by 6:00 AM ET on 4/3
    - Please note that the FFM is also expected to deploy new code to UAT0 on 4/3, during our normally scheduled Friday deployment window, from 7:00 AM ET to noon ET
      - » As a result, UAT0 will largely be unavailable for testing, between 9:00 PM ET on 4/2 and noon ET on 4/3
        - If any additional downtime is required for UAT0, we'll provide an update via our CMS Issuer Communications blast messaging
          - As a reminder, you can request to be added to the CMS Issuer Communications blast messages via [CMS\\_Issuer\\_Communications@cms.hhs.gov](mailto:CMS_Issuer_Communications@cms.hhs.gov)

# Direct Enrollment (DE) Updates: Enrollment Team



*Tuesday, March 31, 2020*

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:  
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

# Reminder and Update for EDE Partners: BAR Opt-Out Functionality Coming Soon to the Update Policy API

- **Background:**
  - The intent of the BAR opt-out functionality is to allow consumers to specifically opt-out of auto re-enrollment for next year's coverage, effectively ending their coverage at the end of the current year
  - BAR opt-out is displayed for applications with at least 1 BAR-eligible policy (active policy, not cancelled or terminated)
    - Note that consumers cannot initiate BAR opt-out on Pended Plan Selections
  - This functionality is dynamically displayed between a configurable date range, normally between early October and the end of the year (~10/6-12/31)
  - If a consumer is opting out of BAR, they currently need to opt out of BAR for all policies tied to the application; policy-level and/or member-level BAR opt-out is not currently supported
- **EDE Partner implementation of BAR opt-out functionality:**
  - EDE Partners will be required to integrate with and expose BAR opt-out functionality to their users by 8/15/2020
    - CMS-initiated Change Request (CR) #40 is available on zONE at <https://zone.cms.gov//document/enhanced-direct-enrollment-edo-documents-and-materials>, and outlines the BAR opt-out integration requirements
  - BAR opt-out will be an additional action within the Update Policy API
    - **Update:** The Update Policy API Spec extract, including the BAR opt-out schema, is now available on zONE at <https://zone.cms.gov//document/enhanced-direct-enrollment-edo-documents-and-materials>
  - UATO deployment of BAR opt-out functionality is expected to occur on April 3<sup>rd</sup>, 2020
    - EDE Partners are encouraged to wait until April 13<sup>th</sup> to begin testing, which will allow CMS time to complete initial shake-out testing in UATO
    - CMS will set the BAR opt-out reference dates in UATO to 1/1/2020-12/31/2020, which will allow EDE Partners to test BAR opt-out functionality throughout the year
      - » As a reminder, SEPs that aren't subject to SEP Verification, such as the Release from Incarceration SEP, can be used to create applications and corresponding policies in UATO
  - Production deployment of BAR opt-out functionality is expected to occur on May 1st, 2020
    - Again, EDE Partners will not be required to integrate with BAR until August 15<sup>th</sup>, 2020

# Update for EDE Partners: BAR Opt-Out Functionality

## Coming Soon to the Update Policy API – Business Rules

- When integrating with the BAR opt-out functionality available via the Update Policy API, EDE entities should familiarize themselves with the business rules outlined below:
  - EDE entities will need to use the Get Enrollment API to determine which active policies exist and subsequently which policies are eligible for BAR opt-out
    - EDE entities should note that Pended Plan Selections are not eligible for BAR opt-out
    - **Update:** EDE entities should also note that policies with a specifiedEoyEndDateIndicator of true, or a cancellation/termination date earlier than 12/31, will not be eligible for BAR opt-out
  - EDE entities will need to use the System Reference Data API to determine when BAR opt-out should be displayed for eligible consumers, based on the configurable BAR opt-out period returned in the System Reference Data API response
  - If a consumer is opting out of BAR, note that the initial Update Policy BAR opt-out functionality will only allow the consumer to opt out of BAR for all existing policies tied to the application
    - This mirrors the existing HealthCare.gov My Account BAR opt-out functionality
      - » In other words, policy-level and member-level BAR opt-outs are not currently supported
  - In situations where a consumer or a consumer's agent/broker is working with an EDE issuer, and the consumer has a policy that is eligible for BAR opt-out that is not owned by the EDE issuer, the EDE issuer is permitted to either:
    - Display available details for the policy in the issuer's UI, and allow the user to opt out of BAR for the policy
      - » Note, EDE issuers may only receive limited details for the policy in the Get Enrollment response
    - Or alternatively, display messaging to the user indicating that a BAR-eligible policy exists that is owned by a different issuer, and that the user can go to HealthCare.gov or the FFE Call Center to opt out of BAR
  - The table on the next slide also outlines when BAR opt-out would be displayed in the UI, along with the outcome of the BAR opt-out

# EDE Partners: BAR Opt-Out Functionality Coming Soon to the Update Policy API – BAR Opt-Out Scenarios

| Scenario Description                                                                                                                                                                                                                                                                                                                          | Display BAR Opt-Out? | Result of BAR Opt-Out                                                                                                                                                                 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Application with: <ul style="list-style-type: none"> <li>No policies tied to it</li> </ul>                                                                                                                                                                                                                                                    | No                   | N/A                                                                                                                                                                                   |
| Application with: <ul style="list-style-type: none"> <li>No active policies tied to it (i.e. cancelled/terminated enrollments only)</li> </ul>                                                                                                                                                                                                | No                   | N/A                                                                                                                                                                                   |
| Application with: <ul style="list-style-type: none"> <li>Active policies tied to it, but outside of configurable BAR opt-out window</li> </ul>                                                                                                                                                                                                | No                   | N/A                                                                                                                                                                                   |
| Application with: <ul style="list-style-type: none"> <li>Active policies tied to it, and inside of configurable BAR opt-out window <ul style="list-style-type: none"> <li>BAR has not occurred</li> <li>Policy has a specifiedEoyEndDateIndicator of false</li> <li>Policy has a insurancePolicyEndDate equal to 12/31</li> </ul> </li> </ul> | Yes                  | <ul style="list-style-type: none"> <li>Current year policy is terminated with a 12/31 termination date (EOY indicator = true)</li> <li>BAR will not be processed</li> </ul>           |
| Application with: <ul style="list-style-type: none"> <li>Active policies tied to it, and inside of configurable BAR opt-out window <ul style="list-style-type: none"> <li>BAR has occurred</li> <li>Policy has a specifiedEoyEndDateIndicator of false</li> <li>Policy has a insurancePolicyEndDate equal to 12/31</li> </ul> </li> </ul>     | Yes                  | <ul style="list-style-type: none"> <li>Current year policy is terminated with a 12/31 termination date (EOY indicator = true)</li> <li>Future year BAR policy is cancelled</li> </ul> |

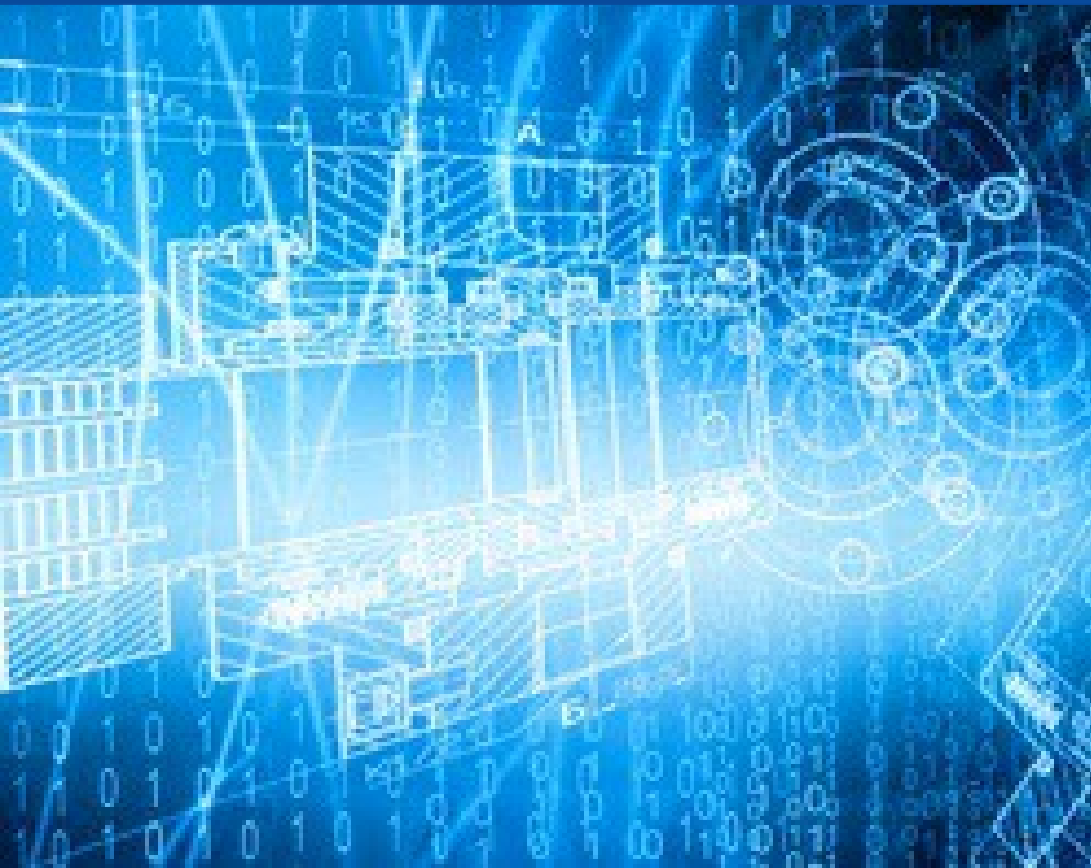
# Classic DE and EDE Partners: Defect Resulting in Submit Enrollment Failures for Households Enrolling 3+ Children

- Classic DE and EDE Partners, please be advised that we have identified a defect that is resulting in Submit Enrollment requests failing in some instances, when there are more than three children enrolling in QHP coverage
  - We've identified that logic is randomly selecting which three children should be used for APTC calculation, when logic should instead always be using the three oldest children for APTC calculation
    - This can result in a mismatch between Fetch Eligibility and Submit Enrollment APTC calculations, which ultimately results in some unnecessary Submit Enrollment failures
  - We expect to deploy a fix for this issue to UAT0 on 4/3, and to production on 5/1

# Q&A



## CMS Issuer Technical Workgroup Call Appendix



To view the full Appendix, please visit  
CMSzONE at the following url:  
[https://zone.cms.gov/system/files/documents/issuer\\_technical\\_slides\\_appendix\\_a\\_2018\\_3\\_20\\_v1.pdf](https://zone.cms.gov/system/files/documents/issuer_technical_slides_appendix_a_2018_3_20_v1.pdf)