

Proxy Direct Enrollment (DE): Technical and Audit Assistance



September 29, 2017

Agenda

- Proxy DE Reminders
- Submission of the Operational Readiness Review (ORR)
- DE Testing
- RIDP/FARS Testing
- Fetch Eligibility
- DE Proxy User Roles
- Waiting Room
- Deadline Contingency
- Medicaid
- Changes In Circumstances (CICs)
- Update to Screener Questions
- Final Reminder
- Questions and Answers

DE Proxy Partners:

Reminder on Items We Need from You

- **DE Proxy Partner Items Needed:** If you are a DE entity that is intending to implement DE proxy in time for the launch of Open Enrollment (OE) this year, please note we need the following items from you (or your technology partner leading the Operational Readiness Review (ORR) if you are using another entity's platform to execute DE Proxy) as quickly as possible:
 - **Your Third-Party Auditor:** These were originally due **Friday, September 8th**. If you have not sent this in we need this no later than COB **Tonight, Friday, September 29th** or you run the risk of not being approved to implement DE Proxy by OE.
 - **Consumer Flow, Agent/Broker Flow or Both:** This was due **Tuesday, September 19th**. We need this ASAP. We are also monitoring which DE partners have started/completed RIDP/FARS testing (for those doing consumer flow.)
 - **Confirm Number of DE Proxy Accounts You need:** This was due **September 21st**. Please send in ASAP if you haven't:
 - » Number of user accounts(with and without multi-tabbing capabilities)
 - » Maximum number of tabs per account
 - » Expected average submission rate (during OE)
 - » Expected max submission rate (during OE)
 - By COB TODAY, **Friday, September 29th** please make sure you submitted the following:
 - » Identify other entities that plan on leveraging your platform for DE Proxy (such as additional issuers using a single Web Broker's DE Proxy pathway—keep in mind they will need to sign the DE Proxy agreement). Alternatively, let us know if you are an entity planning on leveraging another entity's Proxy pathway.
 - » The **privacy policy statement** from your respective website and associated **terms and conditions**.
- **Importance of Deadlines Above:** Remember we are accepting and approving DE Proxy Partners on a rolling basis. If you are late with the above items, you risk the chance of not being approved to implement DE Proxy in time for OE. As a forecast, those partners who do not begin sending in at least part of their **encrypted** ORR reports by the end of next week (**Friday, October 6th**) run the risk of not being approved to implement Proxy by plan year 2018 OE, November 1, 2017.
- **DE Proxy E-mail Address:** Send the information from the above to DirectEnrollment@cms.hhs.gov with the e-mail subject line **"DE Proxy"**. As a reminder, contact us early if you are running into issues to deliver the above. (Thanks to those who have actively engaged our team when running into challenges!)

DE Proxy Partners: Encrypted Submission of the ORR Report

CMS requests that DE entities encrypt the Privacy Questionnaires, ORR reports, or other materials that contain proprietary information prior to submission via email to directenrollment@cms.hhs.gov. Please follow the steps provided below to ensure that materials are sent properly and securely:

1. Encrypt the materials in a zip file that requires a password to open
2. Input in the subject line “[insert name of the document] Encrypted File”
 - E.g., When submitting the Privacy Questionnaire, please use the following subject line: *Privacy Questionnaire Encrypted File*
3. Send the email with the attached files to directenrollment@cms.hhs.gov
 - Do not include any other email addresses.
4. To provide the password, dial 202-406-3944 and leave a voicemail stating the following:
 - Your name and which company you represent
 - The document name
 - The document password
 - The date and time the email was sent to the DE Help Desk Mailbox.
5. Please be sure to provide details such as whether the password contains upper-cased letters, lower-cased letters, or special characters. **For letters, please spell out using the NATO phonetic alphabet if possible (“a” as in alfa, “b” as in bravo, etc.)**

Special Notes for DE Partners Testing

During All-Issuer/Web Broker Testing Next Week

- **DE Proxy Testers:** Currently, you have been able to test in the IMPL2 environment. Once IMP1A testing launches (i.e. October 3rd), please switch to the IMP1A environment. We will be switching our support to that environment specifically moving forward.
- **When Submitting DE Help Desk Tickets:**
 - Please indicate in the subject line whether it is a DE Proxy issue (vs. DE Classic) and whether it is in the Agent/Broker Flow, Consumer Flow, or both.
 - Make sure to include the request/response XMLs for troubleshooting (Fetch Eligibility Request/Response & Submit Enrollment Request/Response).
- **API for DE Partners While Testing:** We can make available the OE 2018 plan data Marketplace API as part of your testing in the IMP1A environment, particularly for those testing DE Proxy. You must sign a separate NDA (keep in mind all testers must not post or share plan data outside of their immediate team.) To request the API, please send an e-mail to CMS_FEPS@cms.hhs.gov with the specific subject line “**IMP1A OE 2018 Testing: Request for DE API**”. You will be asked to sign NDA and upon receipt and review, will receive instructions on how to access the API. Note this is separate and in addition to the confidentiality acknowledgement that each individual IMP1A tester must sign.
- **Reminder on DE Proxy Webinar Friday, September 29th at Noon Eastern Time.** To register, go to RegTap.info and sign up for “Direct Enrollment (DE) Proxy: Technical and Audit Support Session”. Partners can bring their third-party auditors to the session if they have questions.

Moving Towards DE Proxy Go-Live:

Your Help in Managing this Shared Operational Environment

- To maximize performance, CMS has set aside a dedicated partition of the FFM to support DE Proxy partners. However, proxy partners will be working within a shared environment, and the data layer is still shared across all customers.
- Should the system experience difficulties it may become necessary to re-boot the servers for a variety of reasons including:
 - Partners generating more traffic than previously planned, resulting in substantial performance degradation
 - Partners' systems experiencing difficulty and unnecessarily taxing the DE Proxy pathway
 - Incorrectly configured partner systems triggering incorrect eligibility results
 - Any other number of situations that may cause environment instability
- If this happens, all partner sessions will be broken and all partners will have to re-login to continue Proxy. It is important to be aware that one DE partners' system causing issues could potentially affect all partners using Proxy.
- To mitigate the chances of the above occurring, CMS has planned several response mechanisms including:
 - Temporarily suspending the EIDM account(s) of the respective DE Partners' causing the issue based on situations that require us to protect the health of the entire environment.
 - Rebooting the environment to break all active sessions, requiring every partner's automation tools to login again.
 - Revoking the EIDM role for a particular user ID or all of the partner User ID's if the terms of the DE Proxy Agreement and conditions of the Operating Manual are not met and there is no imminent plan to remediate.
- How can DE Proxy Partners Help?
 - Make sure your operations teams understand the above and are aware that one partners' actions could effect the broader community.
 - As part of your Operational Readiness Reports (ORR) please make sure you include the specific contacts with both e-mail and direct phone lines that we can call at any given hour if we need your organization to take an immediate action.
 - Continue to work with CMS and other partners in a team approach to managing this operational environment.

Important: RIDP/FARS Testing Reminder

- If you are implementing a DE Proxy consumer flow, you must RIDP consumers using that flow
- CMS has made our RIDP/FARS services available for your use
 - If you intend on using our services, you must complete the RIDP/FARS testing in order to be approved to use the production endpoints
 - » There are two phases of testing, one using test harness data, and another using Experian data (you must complete the test harness testing before starting the Experian testing)
 - » You can currently only complete the Experian testing on Thursdays
 - » The RIDP/FARS testing can be completed separately from your DE Proxy flow testing
- If you intend to implement a DE Proxy consumer pathway, but you intend to use a third-party identity proofing service, we need you to let us know this information
 - You can email this information to DirectEnrollment@cms.hhs.gov
 - Note that third-party identity proofing services must be Federated Identity, Credential, and Access Management (FICAM) Trust Framework Solutions (TFS) approved
- If you do not intend to implement a DE Proxy consumer pathway, but do intend to implement a DE Proxy agent/broker pathway, please let us now this (if you haven't already)
 - This information can also be sent to DirectEnrollment@cms.hhs.gov
- For more information on testing our RIDP/FARS services, please visit zONE:
 - Issuer Community: <https://zone.cms.gov/document/direct-enrollment-de-documents-and-materials>
 - Web-broker Community: <https://zone.cms.gov/document/ridpv2-farsv2-testing>
- If you have technical question related to connecting to or testing the RIDP/FARS services, please reach out to the Hub Help Desk (dsh.support@qssinc.com)

New Fetch Eligibility and Submit Enrollment Endpoints

Reminder: There are new Fetch Eligibility and Submit Enrollment endpoints for both IMP1A and IMPL2

- IMPL2:
 - Fetch Eligibility Service: <https://impl.hub.cms.gov/Imp2/ApplicantEligibilityServiceV2>
 - Submit Enrollment Service: <https://impl.hub.cms.gov/Imp2/ApplicantEnrollmentServiceV2>
- IMP1A:
 - Fetch Eligibility Service: <https://impl.hub.cms.gov/Imp1/ApplicantEligibilityServiceV2>
 - Submit Enrollment Service: <https://impl.hub.cms.gov/Imp1/ApplicantEnrollmentServiceV2>
- Reminder: IMP1A is unavailable until October 3rd, while the environment is being prepared for OE/BAR testing

Production endpoints are also being updated

- Update expected to take place on October 8th
- Previously reported a hard cutover on October 8th, however we will keep the “V1” endpoints active until 9:00 AM EST on October 13th, at which time the V1 endpoints will be decommissioned
- New production endpoints:
 - Fetch Eligibility Service: <https://hub.cms.gov/ApplicantEligibilityServiceV2>
 - Submit Enrollment Service: <https://hub.cms.gov/ApplicantEnrollmentServiceV2>

New Fetch Eligibility and Submit Enrollment Endpoints (continued)

The new endpoints accommodate the updated schema associated with DE Proxy

- Specifically, the new endpoints will allow for the new User Types associated with DE Proxy:
 - ABProxy
 - ConsumerProxy

The new endpoints will also accommodate some new sub-error codes

- The new sub-error codes provide more granular error reasons
- The new sub-error codes can be found in the DE API Specs
 - Updated version of the DE API Specs now available on zONE:
 - » Issuer Community: <https://zone.cms.gov/document/direct-enrollment-de-documents-and-materials>
 - » Web-broker Community: <https://zone.cms.gov/document/2017-direct-enrollment-api-specifications>
 - Updated versions of the DE Business Service Definitions (BSDs) also now available on zONE:
 - » Issuer Community: <https://zone.cms.gov/document/direct-enrollment-de-documents-and-materials>
 - » Web-broker Community: <https://zone.cms.gov/document/direct-enrollment-fetch-eligibility-bsds>

DE Proxy User Roles – Portal/EIDM

Reminder: The DE Proxy user role will become available via the Portal on October 1st

- DE Proxy Partners will need to request the role for each user account that they expect to need for automation in the production environment
- The DE Proxy user role will be found within the “FFM/Training – Agents/Brokers/Assisters” catalog
- The user roles will not be approved until DE entities have met all of the requirements outlined in the Third-party Auditor guidance and they are approved for DE Proxy
- Note: Each EIDM/Portal account can only have one role assigned (either the A/B role, or the DE Proxy role)

Waiting Room Updates

DE Proxy Partners must have a mechanism/script in place to detect when waiting rooms are up

- Partners must stop submitting both applications and enrollments when waiting rooms are in place
 - Partners can queue applications/enrollments and provide consumers with expected eligibility results
- Once waiting rooms have been removed, DE Partners can resume submission of applications/enrollments
 - CMS will send out a blast communication to all DE Partners when waiting rooms have been lifted
 - » Example email language: Waiting rooms have been deactivated. You may now resume regular DE proxy activity. Please prioritize submission of incoming applications over queued applications.
- Tentative opportunity to test waiting room scripts on October 6th
 - Waiting rooms will be enabled in IMPL2 for 1 hour, from 5:00-6:00 PM EST
 - CMS is looking into the possibility of providing additional testing opportunities

Identifying When Waiting Rooms are in Place

Steps to identify when waiting rooms are in place:

- DE Partner pings the FFM URL (HealthCare.gov)
- DE Partner verifies if waiting room is presented
 - Waiting rooms are not up: DE Partner scrapes the UI and verifies the page appears as below



Identifying When Waiting Rooms are in Place (continued)

Waiting rooms are up: DE Partner scrapes the UI and verifies the page appears as below



Deadline Day Contingency Plan

In the event that FFM is experiencing system performance issues and/or has waiting rooms in place leading up to the OE deadline (3:00 AM EST, 12/16/2017), CMS has put the below contingency plan in place:

- The plan would be to potentially allow DE Proxy Partners to provide us with a list of their enrollments that they had queued leading up to the deadline:
 1. DE Proxy Partners would need to submit the applications to HealthCare.gov – this would be necessary for a few reasons:
 - a) You would need to submit applications for new enrollments in order to obtain an Application ID
 - b) You will not be able to submit additional CICs on the applications until the consumers' enrollments are finalized
 2. DE Proxy Partners would then provide us with a list of Application IDs for those consumers who were queued leading up to the deadline – the list would need to be provided to CMS within 24-48 hours
 3. CMS would run a data cleanup, wherein we would add the following data elements to the consumers' applications
 - a) An Exceptional Circumstances SEP
 - b) An SEP end date of 12/31
 4. DE Proxy Partners would then call the Fetch Eligibility and Submit Enrollment services to finalize the enrollments

Full Medicaid Determination Language

CMS previously provided the following language for determining whether a consumer would like a full Medicaid determination (in the event they aren't Medicaid eligible):

- If any of the people below are not found eligible for Medicaid upon submission of this application, would you like the Marketplace to send their information to the state agency for further review of their Medicaid eligibility?

DE Partners should however display varying language, based on a consumer's state:

- AL, AK, AR, LA, MT, NJ, TN, WY, and WV:
 - If any of the people below are not found eligible for Medicaid upon submission of this application, would you like the Marketplace to send their information to the state agency for further review of their Medicaid eligibility on the basis of disability, blindness, or reoccurring medical needs and bills?
- All other states not listed above:
 - If any of the people below are not found eligible for Medicaid upon submission of this application, would you like the Marketplace to send their information to the state agency for further review of their Medicaid eligibility?

Changes in Circumstances (CICs)

Existing Applications – CICs:

- DE Partners are permitted to ask consumers if they have an existing application prior to starting their automation scripts
- If a consumer indicates that they have an existing application, DE Partners are also permitted to ask the consumer the reason for the CIC prior to starting their automation scripts:

- ☐ Update a person's information or add a new person
- ☐ Remove a person
- ☐ Update income or other information

Update: In the event that a consumer indicates they don't have an existing application, but your automation/bot finds an existing application during the application search, CMS will permit you to default to the, "Update income or other information," reason

Update to Screener Question

- One update was made to the below screener question:

More than two applicants: Are any of you offered health coverage through your job, someone else's job, or COBRA? (Select "Yes" even if any of you didn't enroll, or the enrollment period is over.) Two applicants: Are either of you offered health coverage through your job, someone else's job, or COBRA? (Select "Yes" even if either of you didn't enroll, or the enrollment period is over.) Single applicant: Are you offered health coverage through your job, someone else's job, or COBRA? (Select "Yes" even if you didn't enroll, or the enrollment period is over.)	Toggle buttons • Yes • No	Question Assistance: If you're eligible (even if it's from another person's job, like a parent or spouse), select "Yes," even if you're not currently enrolled. Select "No" if you won't be offered coverage in the next 3 months through your job or another person's job. Learn more. Additional Application Assistance: COBRA: A federal law that may allow you to temporarily keep employer or union health coverage after the employment ends or after you lose coverage as a dependent of the covered employee. This is called "continuation coverage."	Applicant(s)
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- Current application and screener flows can be found on zONE
 - Issuer Community: <https://zone.cms.gov/document/direct-enrollment-de-documents-and-materials>
 - Web-broker Community: <https://zone.cms.gov/document/de-proxy-streamlined-application-and-screener-flows>

DE Proxy Educational Reminders for Agents/Brokers (A/Bs)

DE Proxy Partners implementing an A/B pathway should remind A/Bs that they must receive consent from a consumer before submitting a consumer's data to HealthCare.gov

- In the current double-redirect A/B flow, A/Bs must complete an attestation where they attest that they have received authorization from the consumer
- In the DE Proxy A/B flow however, the automation script (bot) will be completing the attestation

DE Proxy Partners implementing an A/B pathway should also remind A/Bs that they should never use their personal contact information when completing a consumer's eligibility application

- For example, an A/B should not include their personal email or phone number in lieu of a consumer's email address or phone number

DE Proxy: Question and Answer



- To submit or withdraw questions by phone:
 - ***To submit a question, dial 'star(*) pound(#)' on your phone's keypad.***
 - ***To withdraw a question, dial 'star(*) pound(#)' on your phone's keypad.***
- To submit questions by webinar:
 - ***Type your question in the text box under the 'Q&A' tab and click 'Send.'***

Webinar Session Survey

- CMS welcomes your feedback regarding this webinar and values any suggestions that will allow us to enhance this experience for you
- Following the call, we will redirect you to a survey to provide additional comments and feedback
- Please take time to complete the survey and provide CMS with feedback



Closing Remarks

