Enhanced Direct Enrollment (EDE):
# Overview for Issuers

September 8, 2019

Intended Audience and Purpose

- The intended audience for this presentation is issuers exploring the option to become EDE "Upstream Entities."

- The purpose of this presentation is to provide a high-level overview of the EDE program, EDE oversight, program timelines, and other important considerations for issuers interested in seeking approval to participate.

- CMS released the detailed set of updated guidelines on February 19, 2019: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Guidelines-for-Third-party-Auditors-EDE-PY19PY20.pdf.

  - EDE Entities already approved to use the EDE pathway or prospective EDE Entities awaiting approval for EDE will need to review the detailed set of updated guidelines.

Agenda

- EDE Introduction

- CMS EDE Oversight

- Security and Privacy Audit

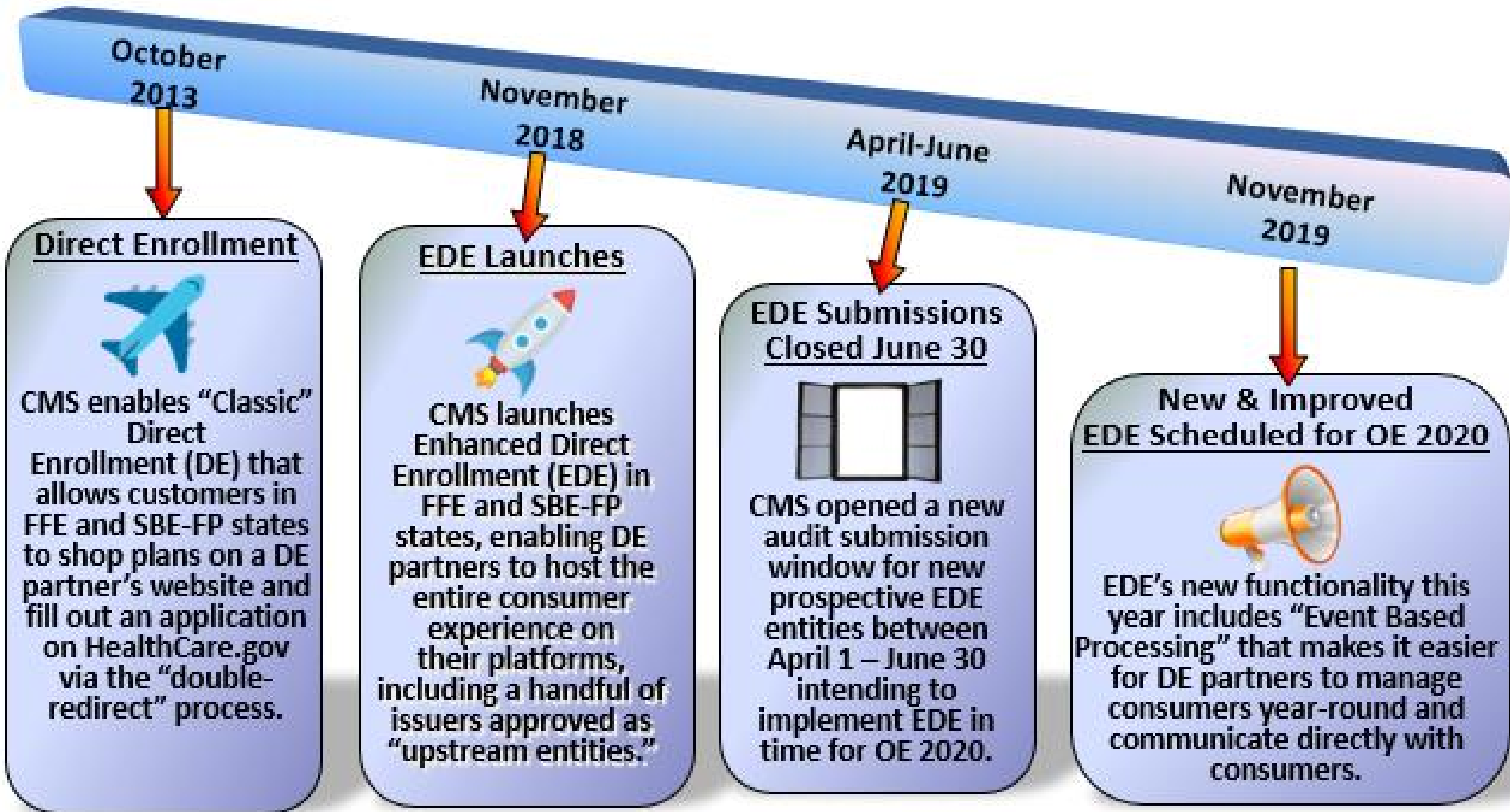- Upstream EDE Entity Summary

EDE Introduction
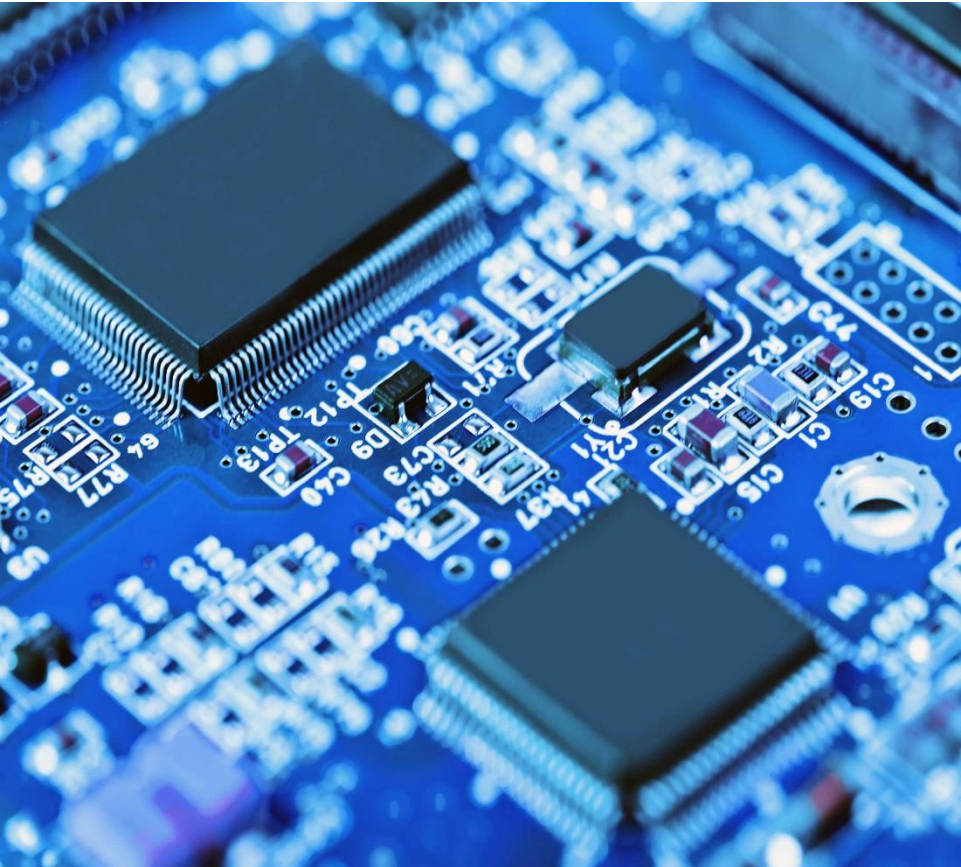
EDE Background

- Enhanced Direct Enrollment (EDE) is an optional program that allows EDE Entities (QHP issuers and web-brokers) to host an application for coverage on their own websites for coverage offered on the FFEs and SBE-FPs (also known as the Marketplaces).

- EDE allows consumers to complete all steps in the eligibility and enrollment process directly on the private EDE Entity's website without ever having to visit HealthCare.gov. The new process expands the use of application programming interfaces (APIs) to transfer data between the Exchange and approved partner websites.

- This new functionality enables private EDE Entities to innovate new enrollment processes to improve the consumer experience in shopping for, applying for, and enrolling in Exchange coverage.

- CMS launched the EDE program in 2018 and the first EDE Entities were approved during the plan year (PY) 2019 Open Enrollment Period (OEP).

- For a summary of the EDE program, please refer to the Frequently Asked Questions (FAQs) for Enhanced Direct Enrollment.
- For a summary of the EDE timeline for calendar year 2019, please refer to the FAQ: Enhanced Direct Enrollment Calendar Year 2019 Timeline.
- For a summary of the EDE timeline for calendar year 2020, please refer to the FAQ: Enhanced Direct Enrollment Calendar Year 2020 Timeline.

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The Direct Enrollment Journey So Far

October 2013

Direct Enrollment

CMS enables "Classic" Direct Enrollment (DE) that allows customers in FFE and SBE-FP states to shop plans on a DE partner's website and fill out an application on HealthCare.gov via the "double-redirect" process.

November 2018

EDE Launches

CMS launches Enhanced Direct Enrollment (EDE) in FFE and SBE-FP states, enabling DE partners to host the entire consumer experience on their platforms, including a handful of issuers approved as "upstream entities."

April-June 2019

EDE Submissions Closed June 30

CMS opened a new audit submission window for new prospective EDE entities between April 1 – June 30 intending to implement EDE in time for OE 2020.

November 2019

New & Improved EDE Scheduled for OE 2020

EDE's new functionality this year includes "Event Based Processing" that makes it easier for DE partners to manage consumers year-round and communicate directly with consumers.

Why EDE?

Bring More Private Sector Innovation to the Exchanges

- Encourage **innovation in the private sector** to experiment with how best to enroll consumers.
- Provide DE partners with data that helps them more fully **manage their clients' coverage**.
- Create Exchange stability through broader and expanded **alternative enrollment platforms**.

Improve the Consumer Experience

- Enable DE partners to provide a **unique and tailored user experience** to their consumers.
- Enable DE partners to host the **entire consumer application** on their platforms.
- Enable consumers to **interact with DE partners directly** via their platforms.

Enable Issuers & Partners to Directly Manage their Customers

- Help DE partners to initiate and fully **maintain customer relationships year-round**.
- Make it easy for DE partners to provide **post-enrollment services** directly to their enrollees.
- Provide **real-time data tools** that help DE partners retain their customers.

Key Differences between EDE & "Classic" DE

Functionality	Classic DE	EDE
• Consumers start their QHP shopping experience by visiting the DE partner site.	X	X
• Consumers must visit HealthCare.gov at key points during the application process in order to complete their enrollment.	X	
• Consumers stay on the DE partner site throughout the entire application and enrollment process.		X
• DE partners can customize the consumer application (within guardrails).		X
• Consumers can return to the DE partner site for changes in circumstances and Special Enrollment Periods (SEPs) if supported by the application phase.		X
• Consumers can upload documentation to resolve SEP Verification Issues (SVIs)/Data Matching Issues (DMIs) on the DE partner site.		X
• Consumers can view the status of their policy, SVIs, and DMIs on the DE partner site.		X
• Consumers can download notices directly from the DE partner site.		X
• Partners own and manage all communications directly with the consumer (rather than CMS/HealthCare.gov) wherever feasible.		X

How it Works: The Suite of EDE API's

EDE partners integrate their systems with CMS' systems through software-to-software information exchange interfaces, which are known as **application program interfaces (APIs).**

Class of API	Functionality
Eligibility APIs	• Enable EDE partners to create, update, submit, delete or view a consumer's application (all with consumer consent).
Enrollment APIs	• Provide EDE partners with the capabilities to retrieve and modify enrollment data in real time. • Allow EDE partners to submit enrollments to the Exchange.
Customer Service APIs	• Check data-matching issue (DMI) and/or Special Enrollment Period (SEP) verification issue (SVI) status. • Store the ID proofing record and establish permission for an EDE partner to perform work on behalf of the consumer. • Upload documents for DMI/SVI adjudication. • Retrieve Exchange notices. • Redirect consumers to issuer sites for binder payments. • Retrieve consumer business events for purposes of consumer messaging.

➡️ *Bottom line: EDE is much more than hosting the consumer application. EDE partners leverage the APIs above to manage the entire end-to-end consumer experience and account management.*

EDE Implementation: 3 Successive Application Builds (Each EDE Partner Selects Initial Starting Phase)

Phase 1: Simplified Application Build

- Support consumer scenarios currently provided by the simplified application, also referred to by issuers and partners as "Application 3.0."

- The minimum level of support required of any EDE partner when they start.

Phase 2: Expanded Application

- Support consumer scenarios from Phase 1.

- In addition, support an expanded (but not infinite) list of consumer support scenarios (including: full-time students, pregnant application members, naturalized US citizens, and step-children).

Phase 3: Complete Application

- Support all consumer scenarios (aka "the kitchen sink").

- Examples of additional scenarios include application members living at different addresses, married couples filing separate tax returns, and more.

In all phases, the EDE partner provides the full EDE API Suite (including eligibility, enrollment and customer service APIs.)

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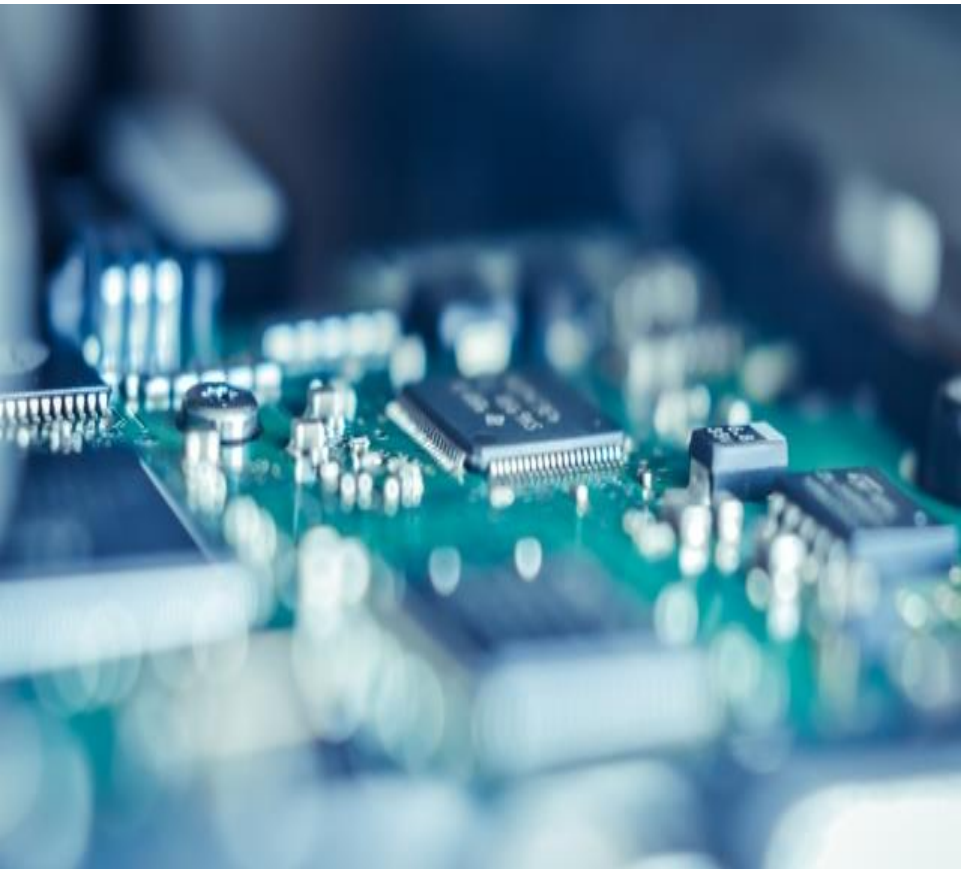
CMS EDE Oversight

EDE Oversight

- To pursue EDE, prospective EDE Entities must build their EDE environments and security programs. Then, prospective EDE Entities must have one (1) or more third parties conduct audits consisting of two (2) parts (a Business Requirements Audit and a Security and Privacy Audit). The audits must be submitted to CMS within the submission windows established by CMS.

- The primary audit submission window for prospective EDE Entities interested in implementing EDE in calendar year 2020 is March 1, 2020 to June 30, 2020.

- For more information on basic EDE program requirements and details, refer to the updated EDE guidelines that were released in February 2019: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Guidelines-for-Third-party-Auditors-EDE-PY19PY20.pdf.

- Prospective EDE Entities can begin developing their EDE environments based on the existing toolkits and security and privacy documentation that are located on CMS zONE in the Issuer and Web-broker Communities.
  - CMS zONE also contains resources on required or recommended documentation that issuer Upstream EDE Entities need to submit to CMS.

Types of EDE Entities (Options to Participate)

- Prospective EDE Entities have two (2) main options to consider in determining how and to what extent to pursue participation in EDE during calendar year 2020 (FAQs available on CMS zONE):
  - A primary EDE Entity is an entity that develops, designs, and hosts its own EDE environment for its own use or for use by others.
    - Prospective EDE Entities that wish to participate in EDE independent of another entity must first be approved to participate in DE as an issuer or web-broker.
  - An upstream EDE Entity is an entity that will use an EDE environment provided by a primary EDE Entity. Upstream EDE Entity models include:
    - "Hybrid" arrangements, and
    - White-label use of a primary EDE Entity's environment by an issuer.
- The list of EDE Entities that are approved to use the EDE pathway is available here.
  - This list is updated frequently, but it may not immediately reflect EDE Entities most recently approved to use the EDE pathway.
  - Prospective upstream EDE Entities should pay particular attention to the EDE Entities that are "hosting an EDE pathway."

Issuer Upstream EDE Entity

- Issuer upstream EDE Entities are subject to the requirements for an upstream EDE Entity as defined in the EDE Guidelines, which includes signing the EDE Business Agreement and receiving a unique Partner ID.
  - If a prospective issuer upstream EDE Entity is only making "minor branding changes" (i.e., will be a white-label user of a primary EDE Entity's environment), the issuer upstream EDE Entity will not be required to submit an audit package.
  - If an issuer upstream EDE Entity is adding systems or functionality, the issuer upstream EDE Entity may be subject to additional requirements related to the additional systems or functionality. Consistent with the processes defined in the EDE Guidelines, issuer upstream EDE Entities that are adding systems or functionality should contact DE Support at directenrollment@cms.hhs.gov.

- Issuer upstream entities should also refer to Sections VII.f and VII.g of the Enhanced Direct Enrollment Agreement Between Enhanced Direct Enrollment Entity and the Centers for Medicare & Medicaid Services for the Individual Market Federally-facilitated Exchanges and the State-Based Exchanges on the Federal Platform (EDE Business Agreement).

- Note: All issuer upstream EDE Entities must have a legal relationship with a primary EDE Entity reflected in a signed, written agreement between the issuer upstream EDE Entity and the primary EDE Entity that meets the requirements defined in 45 C.F.R. § 156.340.

Non-issuer Users of a Primary EDE Entity's EDE Environment

Model 1: White-Label Non-Issuer Users

- Limited to "minor branding changes only" to the primary EDE Entity's EDE environment as defined in the EDE Guidelines

- May be utilized by downstream and delegated agents and brokers

- Users within this classification have added no functionality or systems that constitute part of the overall EDE end-user experience

- Not required to maintain a unique partner ID, sign the EDE Business Agreement, or submit an audit

Model 2: Hybrid, Non-Issuer Upstream EDE Entities

- Adds functionality or systems to the overall EDE end-user experience

  - For example, utilization of redirects between a primary EDE Entity's EDE website and a web-broker's classic DE website to constitute the overall EDE end-user experience

- Required to maintain a unique partner ID, sign the EDE Business Agreement, and submit a modified version of an EDE privacy and security audit

EDE Audit Submission Window for Primary EDE Entities that are Not Live or are Changing EDE Phases in Calendar Year 2020 (March 1 – June 30)

- Prospective upstream EDE Entities should understand the process for prospective primary EDE Entities intending to submit audits during the March 1, 2020 to June 30, 2020 submission window:
  - Prospective primary EDE Entities, who did not submit an audit during the 2019 audit submission window, must submit complete audits between March 1, 2020 and June 30, 2020 to have a chance to be approved for EDE during calendar year 2020.
  - Primary EDE Entities that are already live with EDE and intend to implement a new phase must also submit audits between March 1, 2020 and June 30, 2020.
  - If a prospective EDE Entity submits an audit and resubmits it before hearing from CMS about its original submission, CMS will only consider the date of the latest submission for purposes of determining review priority.
  - CMS will require that incomplete audits be resubmitted in their entirety and will prioritize review of these resubmitted audits based on the date the complete audit is submitted.
    - CMS will not accept resubmitted audits after June 30, 2020, but prospective EDE Entities may be required to resubmit components of audits that CMS previously determined were complete. This may occur when a complete audit does not represent a compliant implementation and deficiencies must be corrected and documented before approval.
  - CMS will conduct an initial high-level review of all audit submissions in the order they are received. If a prospective EDE Entity submits an incomplete audit, CMS will communicate the missing elements to the Entity based on the initial high-level review and the audit will be pulled from the review queue.
  - Once the prospective EDE Entity resubmits a complete audit, CMS will consider that resubmitted audit to be at the end of the review queue based on the date of submission. CMS does not guarantee any approval timelines.

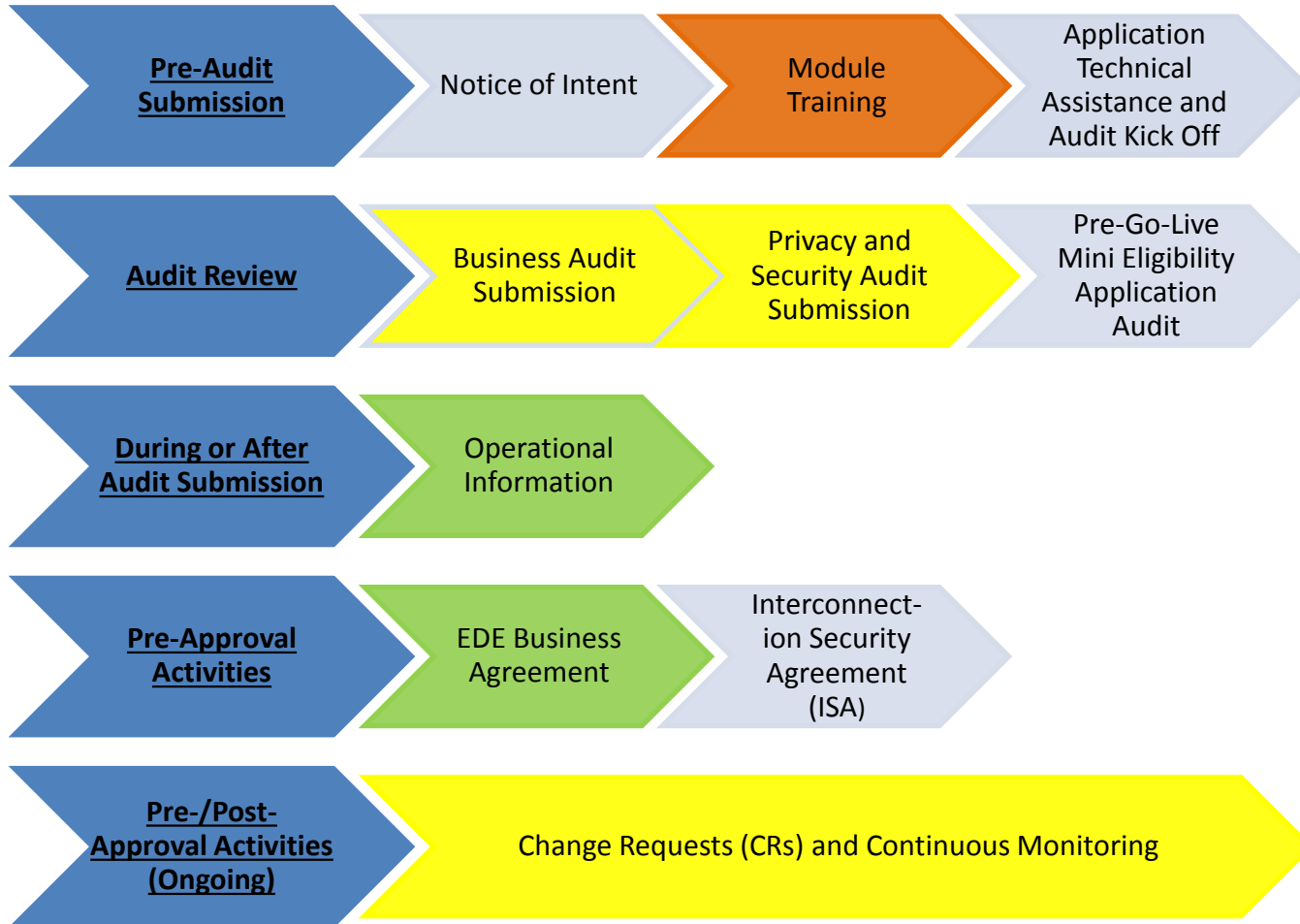# EDE Development and Timeline Considerations

- Developing and auditing an EDE environment takes considerable effort and time (it may take up to or more than a year).

- CMS strongly recommends prospective EDE Entities subject to any audit requirements (e.g., primary EDE Entities and "hybrid" upstream EDE Entities) start developing their EDE environments as early as possible.

- CMS strongly recommends prospective EDE Entities integrate security and privacy safeguard measures into the design, development, and implementation of their EDE information system and continue these measures throughout maintenance, operation, and disposal within their organizationally defined system development life cycle (SDLC).

- CMS recommends that issuers and web-brokers have appropriately skilled staff before attempting to implement EDE as an EDE Entity. This staff should include programmers capable of building websites and integrating with APIs. Entities would also benefit from having staff that are familiar with Marketplace eligibility and enrollment policies, as well as security and privacy best practices.

> ℹ CMS' review of the audit submission may take several months, depending on the quality of the EDE Entity's EDE environment and audit.

EDE Oversight Process – Summary

Upstream EDE Entities can submit the recommended or required documentation (in orange and green, respectively) at any point in the process, but will not be approved by CMS until CMS approves the primary EDE Entity's EDE environment.

Pre-Audit Submission → Notice of Intent → Module Training → Application Technical Assistance and Audit Kick Off

Audit Review → Business Audit Submission → Privacy and Security Audit Submission → Pre-Go-Live Mini Eligibility Application Audit

During or After Audit Submission → Operational Information

Pre-Approval Activities → EDE Business Agreement → Interconnection Security Agreement (ISA)

Pre-/Post-Approval Activities (Ongoing) → Change Requests (CRs) and Continuous Monitoring

This is a high-level summary of the EDE approval process. In general, prospective primary EDE Entities complete each row before progressing to the next.

The **dark** blue chevrons summarize the **gray** blue steps in each row. The next set of slides will describe each row in more detail.

The **green** chevrons indicate *required* steps for prospective upstream EDE Entities. The **orange** chevron indicates recommended steps for prospective upstream EDE Entities. The **yellow** chevrons indicate steps a prospective upstream EDE Entity *may* be required to take depending on the changes they seek to make to a primary EDE Entity's environment (e.g., minor branding changes v. additional systems or functionality).

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> **Auditor Selection**

- The Auditor(s) selected by the prospective primary EDE Entity must be independent.
- An independent third-party Auditor is independent if there is no perceived or actual conflict of interest involving the developmental, operational, and/or management chain associated with the system and the determination of effectiveness (e.g., security and privacy control effectiveness).

- The Auditor(s) selected by the prospective EDE Entity and representative(s) from the prospective primary EDE Entity are required to take CMS-mandated trainings that target the main components of EDE and EDE oversight.
    - The training is a self-paced computer-based training (CBT) and provides information about compliance, EDE technical requirements, privacy and security, and reporting requirements.
    - REGTAP can be accessed at the following link: https://www.regtap.info/.

Business Requirements Auditor Training Requirement	Privacy and Security Auditor Training Requirement	Prospective EDE Entity Training Requirement
• An Auditor who will be completing the business requirements audit must complete the following training modules before initiating that audit: - EDE Regulatory/Compliance Standards, - EDE Application UI Overview, - EDE ORR and CMS Reporting Requirements, - EDE UI Services, and - Other potential modules to be defined by CMS.	• An Auditor who will be completing the privacy and security audit must complete the following training modules before initiating the audit: - EDE Regulatory/Compliance Standards, - EDE Privacy/Security Standards, and - Other potential modules to be defined by CMS.	• Representative(s) from the primary prospective EDE Entity must take all training modules. • CMS encourages representatives from upstream entities to take all trainings as well.

Overview of Business Requirements Audit

- An Auditor will complete a business requirements audit to ensure the prospective primary EDE Entity has complied with applicable requirements as defined in CMS's EDE implementation guidance.
- The business requirements audit focuses on, but is not limited to, the following requirements:

☐ Identity proofing of consumers and agents/brokers
☐ Eligibility application user interface (UI) (e.g., accuracy, correct implementation, and validation)

☐ Communications (e.g., post-eligibility communications and accurate communications about the Exchange and consumer communications
☐ Documentation of interactions with consumer applications or the Exchange

☐ Eligibility results testing and Standalone Eligibility Service (SES) testing
☐ Functional integration of APIs
☐ Section 508 compliance
☐ Non-English language versions of relevant audit components

- Upstream EDE Entity Implications: If a primary EDE Entity does not implement all of the required functionality above, and the upstream EDE Entity must implement some functionality to complete the implementation of the EDE environment, the upstream EDE Entity may be required to conduct and submit an audit for that functionality (e.g., identity proofing of agents/brokers). In addition, if a primary EDE Entity implements all of the required functionality and an upstream EDE entity adds functionality or systems outside of the primary EDE entity's environment, the upstream EDE Entity may be required to conduct and submit an audit for that functionality.

Operational Information

- Organizations participating as a prospective primary EDE Entity must submit the documentation listed below (upstream EDE Entities submit a subset of information, which are in **green**, but the upstream EDE Entity will not be approved until the primary EDE Entity has submitted all required documentation and the primary EDE Entity has been approved):

Privacy Questionnaire
- Asks questions related to Entity websites and what information is collected, how that information is used, and which tracking technologies are utilized in order to assess any privacy impact to consumers

Entity's website privacy policy statement(s) and Terms of Service
- Includes the URL and text of each privacy policy statement displayed on the website, and the website's Terms of Service

Primary EDE Entity Audit Submission Questionnaire
- Collects operational information (e.g., service areas)

ISA Appendix B – "Data Sharing and Connection Information.doc"
- Captures information about the data connections, functionality, and systems between a primary EDE Entity and its upstream EDE Entities
- E.g., entities must describe the information transmitted between primary and upstream entities (e.g., personally identifiable information [PII] data elements, enrollment information, eligibility information, 834s, etc.) and the privacy and security protections applied to such data

Hub Onboarding Form
- A primary EDE Entity that has upstream EDE Entities must update its HUB Onboarding Form, to include additional information for each of its upstream EDE Entities and to obtain a Partner ID or update an existing Partner ID

EDE Business Agreement

- Primary and upstream EDE Entities must submit the EDE Business Agreement to use the EDE pathway.
- CMS will countersign the EDE Business Agreement after CMS has reviewed and approved the business requirements audit and the privacy and security audit and received and approved all required operational information.

Interconnection Security Agreement (ISA)

- A prospective primary EDE Entity must submit the ISA to use the EDE pathway.
- CMS will countersign the ISA after CMS has reviewed and approved the business requirements audit and privacy and security audit.
- The ISA captures information about the data connections, functionality, and systems between a primary EDE Entity and its upstream EDE Entities.

Change Requests (CRs)

- CMS may require primary EDE Entities to implement new or updated EDE requirements. These required revisions will be implemented through CMS-initiated CRs.

- If any EDE Entity wishes to make changes to its EDE environment that was audited by a third-party Auditor and approved by CMS for use in PY 2019, the EDE Entity must follow the process defined by CMS. This may include revisions a primary EDE Entity makes for an upstream EDE Entity, excluding minor branding or logo changes.

Continuous Monitoring

- Continuous Monitoring of Compliance with Business Requirements
    - After CMS issues final approval, it will conduct periodic, post-go-live mini audits. If CMS identifies compliance issues during these mini audits, CMS may immediately suspend the primary EDE Entity's EDE connection until the Entity has addressed any identified compliance issues to CMS' satisfaction.
    - Similarly, if CMS identifies compliance issues with an upstream EDE Entity's use of an EDE environment, CMS may immediately suspend the upstream EDE Entity's EDE connection until the Entity has addressed any identified compliance issues to CMS' satisfaction.
- Continuous Monitoring of Compliance with Privacy and Security Requirements

Security and Privacy Audit

Overview of Security and Privacy Audit

- An EDE Entity must implement security and privacy controls, as well as meet other security and privacy standards, to protect the confidentiality, integrity, and availability of the information collected, used, disclosed, and/or retained by the EDE Entity as defined by CMS in the Interconnection Security Agreement (ISA).

- The EDE Entity and its independent third-party Auditor will work together to develop the Security and Privacy Controls Assessment Test Plan (SAP). This SAP must be submitted to CMS for review prior to the assessment.

- Once the EDE Entity has **fully completed** and implemented its System Security and Privacy Plan (SSP), and no issues arise from CMS's review of the SAP, only then should the Auditor begin the security and privacy audit.

- Primary EDE Entities complete the privacy and security audits in most cases. In some cases, an upstream EDE Entity may need to complete a privacy and security audit if adding functionality or systems to a primary EDE Entity's environment.

> The Auditor should not begin the assessment if the SSP is incomplete.

Summary and Resources

Upstream EDE Entity Summary

- Upstream issuers have two (2) modes of participation:
  - White-label issuer model: Primary EDE Entity only makes minor changes to the UI for branding purposes
    - The upstream issuer would not need to submit a business or privacy and security audit
  - "Hybrid" issuer model (Issuer with additional systems or functionality): Upstream issuer implements an EDE environment composed of a primary EDE Entity's environment and additional functionality or systems implemented by or on behalf of the upstream issuer, which may include data connections to external, issuer-owned data sources.
    - The upstream issuer may be subject to additional audit requirements related to the additional systems or functionality
- An upstream issuer must do the following to become an approved upstream EDE Entity:
  - Determine which EDE phase to implement and identify a primary EDE Entity to provide an EDE environment to the issuer (list of currently approved EDE Entities available here: https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Downloads/EDE-ApprovedPartners.pdf);
  - Finalize an arrangement with the primary EDE Entity, which the primary EDE Entity will document in an ISA Appendix B submission;
  - Create a Partner ID or update an existing Partner ID;
  - Contact DE Support (directenrollment@cms.hhs.gov) to provide notice of the arrangement;
  - Submit operational information to CMS, including a copy of the issuer's website privacy policy and terms of service;
  - For hybrid arrangements, submit additional audit requirements related to the additional systems or functionality (as may be required); and
  - Submit an EDE Business Agreement to CMS.

Public EDE Resources for Prospective EDE Entities That Are <u>Not</u> DE Entities

Resource	Description	Link
Guidelines for Third-party Auditor Operational Readiness Reviews for the Enhanced Direct Enrollment Pathway and Related Oversight Requirements	Updated set of EDE guidelines published in February 2019	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Guidelines-for-Third-party-Auditors-EDE-PY19PY20.pdf
Processes and Guidelines for Becoming a Web-broker in the Federally-facilitated Exchanges	Presentation reviews the registration process and operational requirements for web-brokers to operate in the FFEs and SBE-FPs	https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Downloads/Processes-Becoming-Web-broker.pdf
FAQ: Enhanced Direct Enrollment Calendar Year 2019 Timeline	Overview of requirements and submission timelines for prospective EDE Entities that plan to apply to use the EDE pathway in calendar year 2019	https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Downloads/FAQ-EDE-CY2019.pdf
FAQ: Enhanced Direct Enrollment Calendar Year 2020 Timeline	Overview of requirements and submission timelines for prospective EDE Entities that plan to apply to use the EDE pathway in calendar year 2020	https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/Downloads/FAQ-EDE-CY2020.pdf
FAQs Regarding EDE Participation Requirements for Non-Issuer Users of a Primary Entity's EDE Environment	This document contains FAQs related to more specific requirements for two models for EDE participation	https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Downloads/EDE-2019-Non-Issuer-FAQ.pdf
FFE and FF-SHOP Enrollment Manual	Operational policy and guidance on key topics related to eligibility and enrollment activities within the FFEs and FF-SHOPs, as well as within the SBEs-FP	https://www.regtap.info/uploads/library/ENR_EnrollmentManualForFFEandFF-SHOP_v1_5CR_092519.pdf
EDE computer-based-trainings (CBTs) on REGTAP	Initial set of EDE trainings; CMS may release updated required trainings. A REGTAP account is required to view this material.	https://www.regtap.info/DirectEnrollment.php

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Additional Resources

- List of approved EDE Entities (see "Enhanced Direct Enrollment Approved Partners"): https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Web-brokers-in-the-Health-Insurance-Marketplace.html

- Additional resources can be found on CCIIO's Web-broker Resources webpage: https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Web-brokers-in-the-Health-Insurance-Marketplace.html

- 2020 Letter to Issuers: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Final-2020-Letter-to-Issuers-in-the-Federally-facilitated-Exchanges.pdf

- CMS website for issuers seeking certification to participate in the FFEs: https://www.qhpcertification.cms.gov/s/QHP

- CMS zONE:
  - CMS currently posts all technical information, guidelines, audit resources, and other documentation on the CMS zONE EDE Documents and Materials webpage at the following link: https://zone.cms.gov/document/enhanced-direct-enrollment-ede-documents-and-materials. This webpage is accessible by members of the Private Issuer Community (for issuers) and the Web-Broker Community (for web-brokers) only.

- Help Desk Support:
  - Compliance and audit-related questions should be sent to the DE Help Desk at directenrollment@cms.hhs.gov
  - Technical issues or questions that concern technical build or system issues identified in the test or production environment should go to the FEPS Help Desk at CMS_FEPS@cms.hhs.gov