ID	General Y/N	Section #	Page #	Req #	Description	Cosmetic Y/N	Reviewer Organization
No Wrong Door	Y	GENERAL			We commend the specific provisions that relate to the development of a "no-wrong door" service system.	N	United Ways of California
Integration with Non-health Programs	Y	GENERAL			We applaud your future vision and a requirement for horizontal intregration with other non-health, human services. While mentioned in several sections, we urge you to require early on the development of CalHEERS to support integration of enrollment from other human services and income support programs. CalHEERS should be interoperable with other enrollment systems and accommodate people when they seek non-health human services. CalHEERS and other systems should support the ability to pre-populate the health application with data from other systems. (UWCA letter to HBEX dated December 15, 2011)	N	United Ways of California
Reporting	Y	GENERAL			Public reporting of aggregate data collection, including demographic data, is crucial for evaluation and transparency and should be made available on the CalHEERs website	N	United Ways of California
1a Eligibility & Enrollment	Y	GENERAL			We support and appreviate the required functionality in the application eligiblity and erollment processes that are user-friendly features. It is crucial that the user is able to save work in progress, have data pre-populated with consent and allow user to self-attest to eligibility information. A Chat Function is also crucial so user can ask simple, easy to answer questions while online with an option provided to be transfered to a phone assister.	N	United Ways of California

1b	N	4.3.1	4-1		The functionalities include a calculator to compare costs across plans, but it does not include a calculator for determining eligibility under MAGI. There should be a calculator to easily compute annual income and compare to the current income levels for MAGI Medi-Cal, Healthy Families and advanced premium credits. We assume there will be many applicants who have had a change in income levels since the MAGI reported from the federal data hub.	N	United Ways of California
2a Acct Mgt	N	1.4.1	page 1-8		We highly support the ability for a user to browse annonymously before providing personal information. This is crucial to increase trust levels among users.	N	United Ways of California
2b	N	4.3.1	page 4-1		We support how the proposed system will update and report both to the consumer and assister.	N	United Ways of California
3a Renewals	N	4.3.1	4-3		We support allowing the enrollee to choose the method by which they will be informed of the annual enrollment or renewal period but request as others do that they be able to select at least 2 methods, e.g. text and email, or text and mail, etc to ensurethey receive the information.	N	United Ways of California
3b	N	4.3.1	4-3		The written renewal notification should be pre-populated with information known about the beneficiary so they only have to add information not otherwise available in databases and/or change incorrect information.	N	United Ways of California
4a Consumer Assistance	N	4.3.5	page 4-8		The term "Assister" may include Navigator, Broker, Agent, County Worker, and MRMIB worker. However, the list of Assisters should include language to ensure that the system provides functionality for any other individual or entity, as identified under policies yet to be developed, who has sufficient training to assist people in applying for and obtaining coverage.	N	United Ways of California

4b	N		page 4-9		We strongly support a reporting and tracking functionality that will allow the Exchange to "Track the source of possible outreach efforts (e.g. TV, radio, online, etc.)". This should include Social Media, events, etc. We must have this information to best see what works and what does not in reaching various populations.	N	United Ways of California
4c	N	4.3.7	page 4-14		The term "Assister" may include Navigator, Broker, Agent, County Worker, and MRMIB worker. However, the list of Assisters should include language to ensure that the system provides functionality for any other individual or entity, as identified under policies yet to be developed, who has sufficient training to assist people in applying for and obtaining coverage.	N	United Ways of California
5a Assister Interface		4.3.2	page 4-5		We appreciate that the system will include the ability to track application and enrollments via assisters.	N	United Ways of California
5b		4.6.3.1	page 4-58		In Table 14, we appreciate that there will be a training program, yet to be determined, for Assisters but no specific education requirement that could unnecessarily limit access to community assisters who are trusted and work well with specific populations. Assisters must be diverse, trusted individuals who can assist a consumer by phone or inperson.	N	United Ways of California
5c	Y	GENERAL			The system should be able to categorize Assisters based on language capacity, population specialties as well as location, etc.	N	United Ways of California

6a Human Services Integration /non-health integration	Y	GENERAL	1-7		We appreciate the inclusion of "expanded integration" with human services programs as part of the future vision for CalHEERS. However, we suggest the HBEX increase the prominence to make this vision more concrete and ensure that two-way horizontal integration occurs sooner than later. Evidence shows that most people seeking help are looking for food, shelter and income supports. (211 Call center data from 1.6 million calls show only 7-15% of people call for healthcare.) The system must meet consumers where they are while applying for other non-health programs and faciliate their easy entry into needed health coverage through CalHEERS. These programs should include but not be limited to: CalFresh, CalWORKS, child care subsidies, EITC, Housing subsidies, etc.	N	United Ways of California
6b Non-health program integration	N	4.3.1	4-4		With respect to the first sub-bullet under "Other Non-Health Services Programs" (notifying applicants they may be eligible for other programs and directing them to appropropriate links), we recommend that this function be considered a Core Functionality Service, with delivery required by January 1, 2014, rather than a Mandatory Optional Functionality Service. With respect to the second sub-bullet in this section (collecting and sending application data to another system to "complete the application process"), we recommend that this bullet be revised as follows: "Collecting and sending the basic application data to the system of record for that program to CONTINUE the application process AND TRACK THE RESULT OF THAT PROCESS, WITH THIS FUNCTIONALITY TO BE DELIVERED ON OR BEFORE DECEMBER 31, 2015.	N	United Ways of California

6c	N			BR 46	We recommend that the following requirement be inserted after the current BR46: "The CalHEERS shall provide the functionality to collect and send basic application data for other non-health services programs to the system of record in order to continue the application process and track the result of that process, with this functionality to be delivered on or before December 31, 2015."	N	United Ways of California
6d External Systems Interface	N	4.4	4-20		We appreciate requirement to "Ensure seamless coordination and integration with the Exchange to allow interoperability with other health information exchanges, public health agencies, **human services programs**, and community organizations providing outreach and enrollment assistance services." We suggest requiring this interface and interoperability by no later than December 31, 2015. And stress that the real reason this is essential is it is a crucial way to find the millions who need to enroll, engage them about health coverage and make it easy to enroll through an effective interface.	N	United Ways of California
6e Technical Approach	N	5.5.2.6	6-20		We appreciate the calling out of non-health human services for seamless coordination and interoperability with CalHEERS	N	United Ways of California
7a Reporting/ Monitoring	Y	4.3.4	4-6		Monthly reports on HBEX enrollees, including unique individual identifier, plan, type of coverage, rating criteria, demographic data, effective dates - importance of making this information easily accessible to the public on the website of CalHEERS. This same should be collected for enrollees in the SHOP Exchange. Tracking data will facilitate targeted outreach.	N	United Ways of California
7b	N	4.4.12	4-45		We appreciate the excellent list of coverage metrics, affordability and comprehensiveness, access to care, consumer experience, consumer feedback, assister support, technology platform, etc.	N	United Ways of California