

Covered California

RFI 2016-005 SEP Electronic Verifications RFI

Questions and Answers September 29, 2016

Question	Answer
1. Has funding already been allocated for this and if so, from which source (budget, grant, etc.)? If not, which source will be sought?	Covered California is awaiting the results of the RFI to determine the appropriate budget amount to allocate from the operating budget.
2. Does Covered Ca have an estimated cost, or desired not to exceed contract amount in mind for this and if so, how much?	Covered California does not have an estimated cost, or desired not to exceed contract amount in mind.
3. Which systems currently in place will require integration and which vendors provided them?	The solution must interface with the California Healthcare Eligibility, Enrollment, and Retention System (CalHEERS) provided by Accenture. Through the RFI responses, Covered California is looking forward to learning about recommended approaches and live similar solutions that may include interfaces to data and systems that support verification of the different qualifying life events outlined within the RFI.
4. The RFI indicates that Covered California utilizes federal data hub services to verify an enrollee’s citizenship and incarceration status for eligibility purposes, and does not currently have capabilities to electronically verify a consumer’s qualifying life event for a special enrollment period. Is the lack of this capability the only driver behind this project? If not, what are the other drivers?	The primary driver behind the project is performing timely, accurate and cost effective verifications of qualifying life events during the special enrollment periods, and prior to effectuating coverage.
5. Would you please provide additional context in regards to the business problem and its impacts? What are the shortcomings of the current process? Which stakeholders are being impacted by the current process? Can you please explain what those impacts are for each stakeholder? Currently, if a consumer attests to involuntarily losing their minimum essential coverage and purchase a second policy, what are the impacts? Who is impacted?	Our current process requires Covered California to accept an attestation that the consumer has a qualifying life event (QLE) triggering the Special Enrollment Period (SEP). There is a concern that some uninsured consumers may not have had a triggering QLE and may be using the SEP attestation policy as a means of getting access to health coverage outside of the open enrollment period due to an urgent need for care. Permitting consumers to elect to wait to get health care coverage until access to care is needed raises the cost of health insurance overall. While Consumer advocacy groups agree that such practice negatively impacts the risk pool, they have raised the concern that certain triggering QLEs cannot be verified, for example permanent move. To

	<p>ensure consumers have had a triggering QLE, Covered California is seeking solutions that perform verifications of qualifying life events in a timely manner.</p>
<p>6. Who is ultimately responsible for validating someone had a qualifying life event? Is that Covered California or the qualified health plans?</p>	<p>Under current practice, if someone applies through CoveredCA.com, then Covered California will validate the QLE. If someone applies outside of the Covered California marketplace through the individual market, then the health plan will validate the QLE. If an electronic verification solution were implemented, both Covered California and off-Exchange individual market health plans could leverage the solution. This would require broader participation from plans outside of the Covered California marketplace.</p>
<p>7. The verification of secondary QLE’s listed in Attachment A could be problematic from a timing perspective. For example, information on the birth of a child could take time to get that information from the hospital to the County for recording and then on to the State’s Vital Records database. On the California Vital Records web page in regards to the timing of birth information, it states it could take up to 3 months to receive that information from the counties “Birth and Death: Be requested from the County Health Department or the County Recorder’s Office for the first 3 months after the event. “ Given that fact that the special enrollment period only lasts 60 days and that you encourage consumers to notify of the QLE as soon as possible, how do you see this verification happening in a timely fashion?</p>	<p>Through this RFI, Covered California is very interested in hearing about potential industry solutions to this challenge.</p>
<p>8. Do you current use a data broker such as Lexis-Nexis or TransUnion within CalHEERS today? If so, could you please explain the use case? Are there other current CalHEERS technology assets that vendors should consider in their solutions to maximize leveraging existing assets?</p>	<p>Covered California currently takes advantage of data broker services available through the Federal Data Services Hub (FDSH). While Covered California hasn’t integrated all of the data sources into CalHEERS, they are available to integrate. The services include:</p> <ul style="list-style-type: none"> <li>• Citizenship or immigration status</li> <li>• Enrollment in Federally funded minimum essential health coverage (e.g. Medicare, Medicaid, Federal Employees Health Benefit Program (FEHBP), Veterans Health Administration (Champ VA), Children's Health</li> </ul>

	<p>Insurance Program (CHIP), Department of Defense (TRICARE), Peace Corps)</p> <ul style="list-style-type: none"> <li>• Incarceration status</li> <li>• Indian status</li> <li>• Enrollment in employer-sponsored coverage</li> <li>• Status as a veteran</li> <li>• Household income, including tax return information from the IRS, income information from the Social Security Administration</li> </ul> <p>Secondary data sources or brokers available in CalHEERS include the California Employment Development Department wages, Franchise Tax Board annual income, and the Medi-cal Eligibility Determination System (MEDS) for existing health coverage.</p>
<p>9. Please clarify which QLE's listed in Attachment A are not currently supported by an electronic verification process. The reason for the question being that in Section 3.2, it mentions that citizenship and incarceration status are currently verified electronically.</p>	<p>Citizenship and incarceration status are currently verified electronically for eligibility but not for qualifying life events (QLEs) during the special enrollment period. None of the QLE's are currently supported by an electronic verification process. Note: The SEP verification of a qualifying life event can require verification of a change in status, for example: from incarcerated to no longer incarcerated; or from not being a citizen or having lawful presence, to becoming a citizen or gaining lawful presence status.</p>
<p>10. What is the estimated monthly transaction volume for each QLE listed in Attachment A? What is the estimated annual growth rate for each QLE?</p>	<p>As <a href="#">reported</a> in a previous board meeting (see slide 10), Covered California had 129,800 special enrollments for the period of February 23 through June 8, 2015. This report provides the number of individuals for each QLE.</p> <p>As <a href="#">reported</a> in February 2016 (see slide 8), special enrollment is growing as a percentage of overall enrollment. Special Enrollment comprised 11% of effectuated membership in 2014 and 13% in 2015. Two large plans are showing movement towards 20% in 2015 SEP enrollment.</p>
<p>11. Would the Agency benefit and realize an advantage of a single solution/platform from a company that can manage functionality and eliminate manual processes as defined in both RFI #2016-004, Document Verification Services, and RFI #2016-005 SEP Electronic Verifications?</p>	<p>Yes, if a vendor can address the business problems outlined in both RFI #2016-004 and RFI#2016-005, the vendor is encouraged to describe the solution and their ability to integrate and provide a single solution to both business problems.</p>

<p>12. How are the people that are manually verifying, the QLEs currently identified in Attachment A, accomplishing that task? Please describe that manual process.</p>	<p>The SEP verification process is entirely manual process. The following is a summary of the process:</p> <ol style="list-style-type: none"> <li>1. Statistically valid sample of consumers enrolled during the SEP is selected.</li> <li>2. Consumers are contacted via mail with a request to provide documentation of the SEP QLE within 30 days.</li> <li>3. Documents may be uploaded to a SharePoint site (outside of CalHEERS).</li> <li>4. Phone call, email and mail (as appropriate) follow-up is initiated 15 days prior to the due date if a consumer has not responded to the request. Additional follow-up may occur as needed.</li> <li>5. A document received is reviewed by a designated group of staff to compare the document against a list of acceptable documents. Link of acceptable documents is here: <a href="http://www.coveredca.com/PDFs/SEP-Acceptable-Documents.pdf">http://www.coveredca.com/PDFs/SEP-Acceptable-Documents.pdf</a></li> <li>6. A consumer who submits a document on the list is cleared and remains enrolled in coverage.</li> </ol> <p>Note: The current process outlined above begins by selecting a statistically valid sample. In contrast, the RFI is requesting information about potential solutions that will verify qualifying life events in all applications for insurance coverage during the special enrollment period.</p>
<p>13. What systems are being used to perform the manual QLE verification? Are they Web based systems, terminal/green screen based systems, or is it a mix of machine based verifications and manual activity presumably phone calls etc..?</p>	<p>Manual activity only see response to Q#12.</p>
<p>14. If the answer from question 12 is mix of system, what is the ratio of machine based verifications to manual activity?</p>	<p>Manual activity only see response to Q#12.</p>
<p>15. What is the number of verifications that is envisioned? X number a week with spikes as high Y per minute/hour etc.</p>	<p>Please see Question and Answer #10 for detail regarding transaction volumes. Covered California envisions the number of verifications going forward will be at least the same as those identified in Answer #10 and likely higher. Covered California notes that loss of minimum</p>

	essential coverage (MEC) is the most selected QLE during special enrollment periods.
16. Are any of the verifications available as web services? In other words, are there verifications that are being done either manually, by machine or entirely manually that are known to be available as software interfaces of some kind? If so, what kind of interfaces? Please describe the known interfaces.	See question #8 for list of electronic verification sources. All of the verifications listed are available as real-time web services. In addition, there is a batch service used for annual verifications at renewal. This service, the RRV renewal service, is a batch service.
17. What are the activities that trigger a verification to occur? Is it only the consumer notifying you of an event? Are the other things that need to be monitored that could trigger the need for a verification to occur?	The activity that triggers a verification to occur is when a consumer applies for insurance coverage during the special enrollment period.