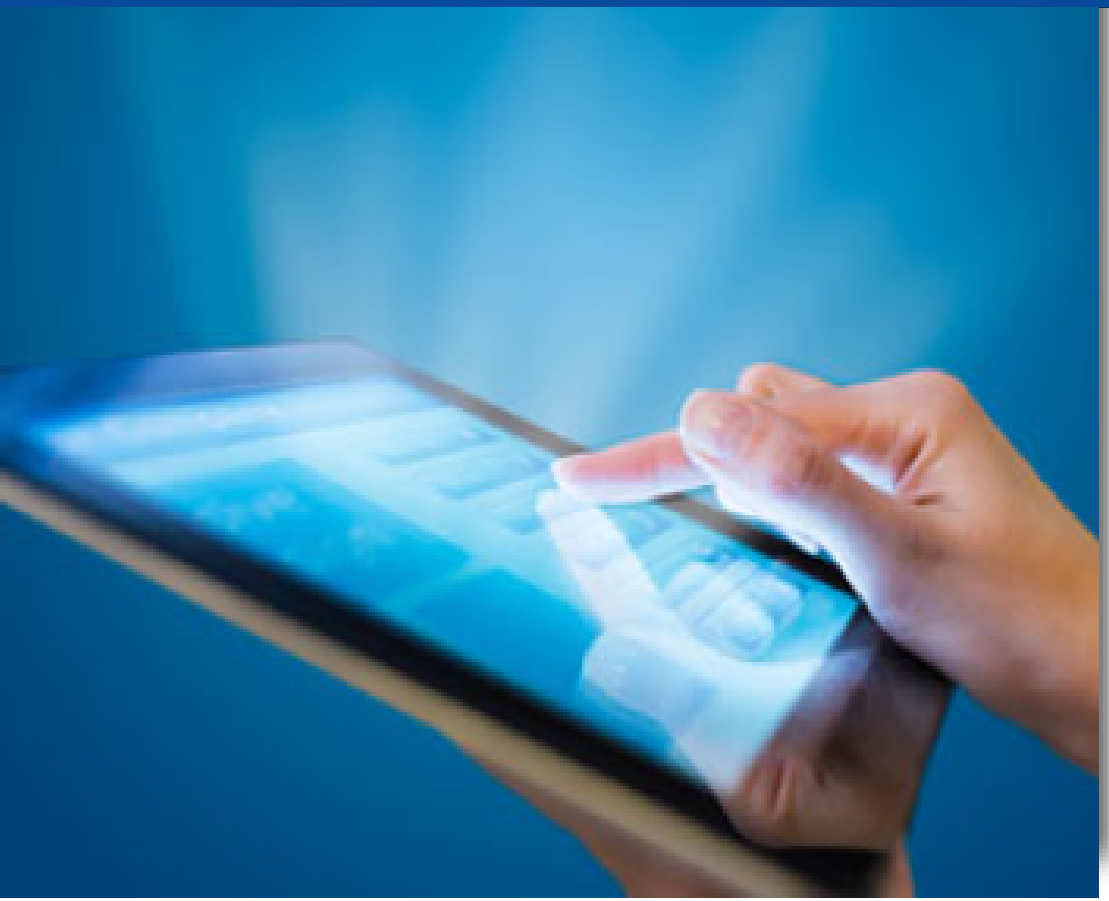
Using Private Partner Websites to Enroll Consumers in Marketplace Coverage



June 27, 2019

Centers for Medicare & Medicaid Services (CMS)
Center for Consumer Information & Insurance Oversight (CCIIO)

Disclaimer

The information provided in this presentation is intended only as a general informal summary of technical legal standards. It is not intended to take the place of the statutes, regulations, and formal policy guidance that it is based upon. This presentation summarizes current policy and operations as of the date it was presented. Links to certain source documents have been provided for your reference. We encourage learners to refer to the applicable statutes, regulations, and other interpretive materials for complete and current information about the requirements that apply to them.

This document generally is not intended for use in the State-based Marketplaces that do not use HealthCare.gov for eligibility and enrollment. Please review the guidance on our Agents and Brokers Resources webpage (http://go.cms.gov/CCIIOAB) and Marketplace.CMS.gov to learn more.

Unless indicated otherwise, the general references to "Marketplace" in the presentation only includes Federally-facilitated Marketplaces (FFMs) and State-based Marketplaces on the Federal Platform.

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Webinar Agenda

- Pathways to Assist Consumers Enrolling in Marketplace Coverage: HealthCare.gov and Private Partner Websites
- Overview of Enhanced Private Partner Website Pathway
- How Consumers Can Connect Private Partner Website Pathway Applications to HealthCare.gov Accounts
- Other Marketplace Updates
- Questions and Answers

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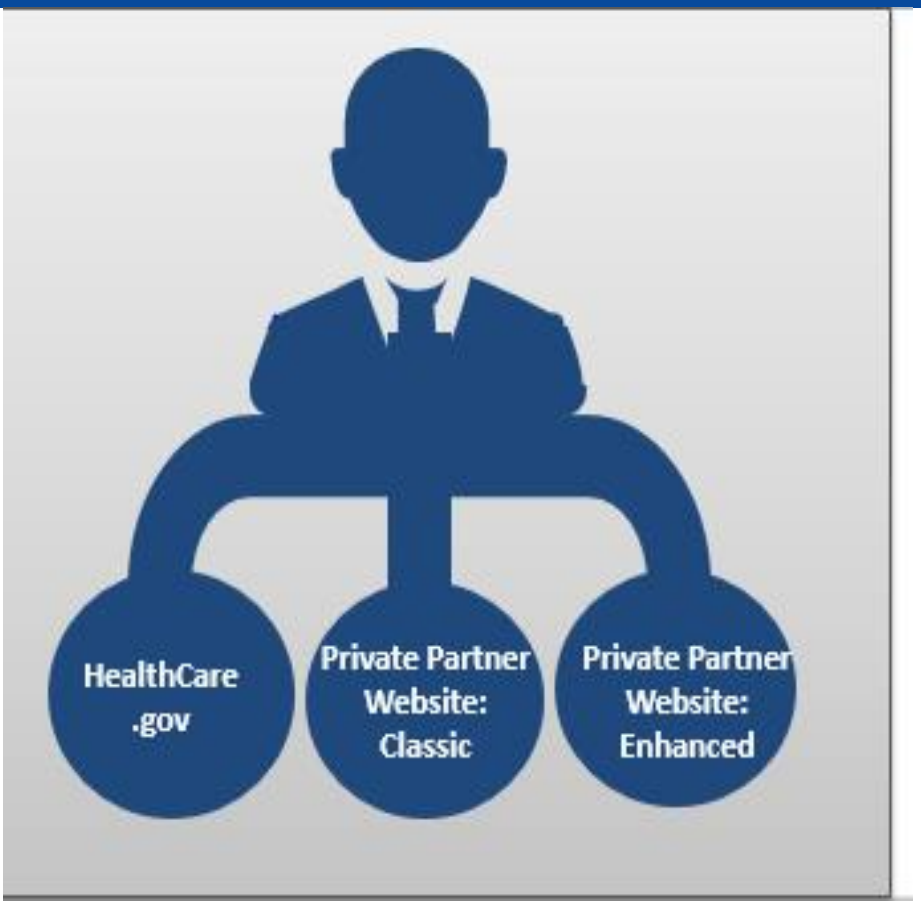


Pathways to Assist Consumers Enrolling in Marketplace Coverage: HealthCare.gov and Private Partner Websites

Marketplace Enrollment Pathways

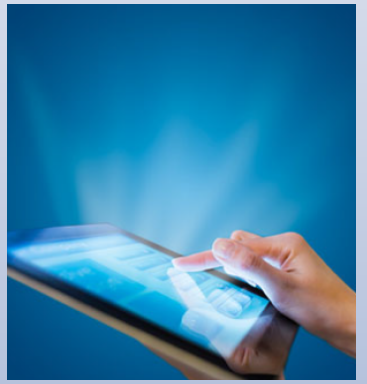
Agents and brokers registered with the Marketplace may assist consumers with enrollment in a Marketplace qualified health plan (QHP) through two pathways:

HealthCare.gov Pathway

Use HealthCare.gov and work "side-by-side" with consumers.

Private Partner Website Pathway

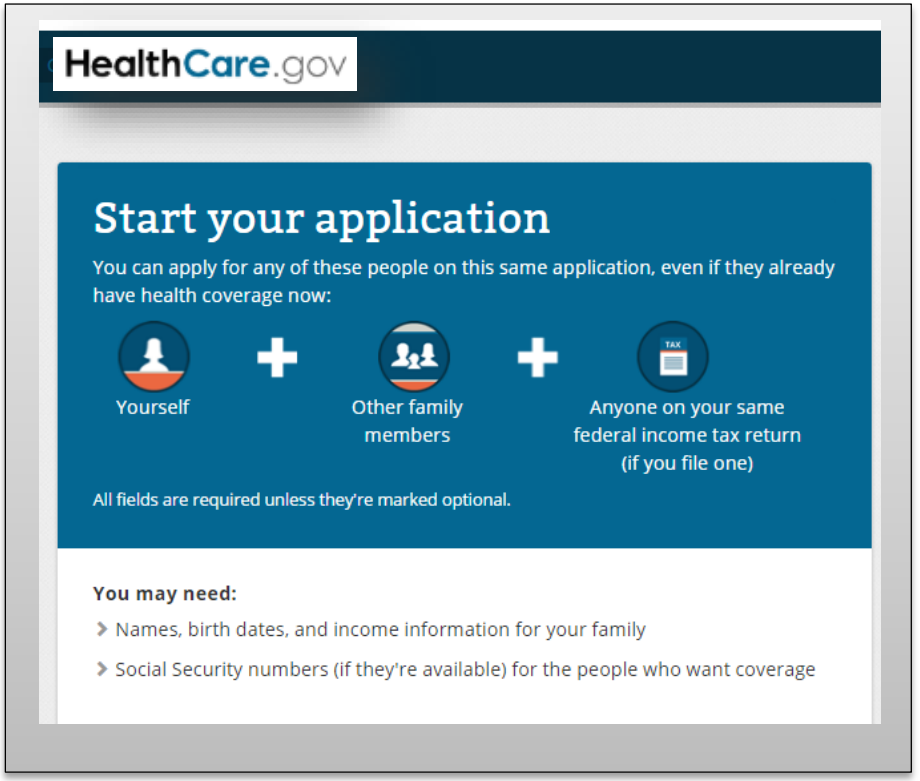
Use an approved private third-party (issuer or web-broker) website (also known as Direct Enrollment (DE)).



HealthCare.gov Pathway

When working side-by-side with consumers on HealthCare.gov, as in past years, there are two applications available. Screener questions are used to determine which application consumers can use.

- Most consumers with simple household scenarios will use a streamlined application.
- Selected consumers with additional, more complicated considerations for eligibility determinations will use a full application.



Private Partner Website Pathway

Issuers and web-brokers that are approved to participate in the Private Partner Website Pathway may offer different levels of service for agents and brokers assisting consumers.

Private Partner Website Pathway: Classic

- Agents and brokers begin on an issuer's or web-broker's website, redirect to HealthCare.gov to submit an application and get an eligibility determination, and then are redirected back to the private partner's website to complete enrollment.
- This functionality is also known as the Classic Direct Enrollment or the "Double Redirect" Pathway.

Private Partner Website Pathway: Enhanced

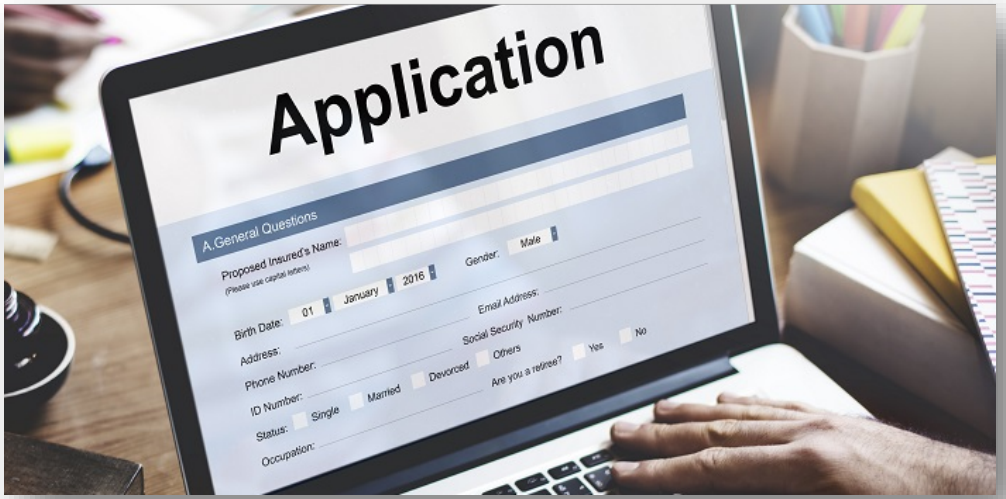
- Some approved partners offer enhanced functionality that includes fully integrated platforms that provide a range of custom features and capabilities, enabling agents and brokers to more easily assist clients with year-round policy and client relationship management.
- This functionality is also known as the Enhanced Direct Enrollment (EDE) Pathway.
- The Marketplace remains responsible for making eligibility determinations.

Using Private Partner Websites to Enroll Consumers in Marketplace Coverage

Overview of Enhanced Private Partner Website Pathway

Private Partner Website Pathway: Enhanced Customized, Partner-Hosted Application

- Issuers and web-brokers that are approved to offer the enhanced functionality host the application on their platforms.
- They may customize the Marketplace application, potentially simplifying and streamlining the questions that consumers are asked, as long as they do not alter the substance of the Marketplace application.
- The Marketplace remains responsible for making eligibility determinations.



Private Partner Website Pathway: Enhanced Application Functionality May Vary

Approved partners are able to offer three different levels of hosted application functionality based on the consumer and household scenarios they support through their respective EDE Pathways:

- **Simplified application**, which includes the minimum set of consumer scenarios that must be supported by an Enhanced Direct Enrollment Pathway
- **Expanded application,** which supports an expanded list of consumer support scenarios in addition to those covered by the simplified application, including full-time students, pregnant application members, naturalized U.S. citizens, and stepchildren
- **Complete application**, which supports all consumer scenarios, including application members living at different addresses, married couples filing separate tax returns, and more

Private Partner Website Pathway: Enhanced Application Functionality May Vary (Continued)

- Issuer or web-broker websites with enhanced capabilities will typically have screener questions to determine which consumers can be supported through their hosted application.
- If consumers cannot be assisted through an approved EDE partner's website because their circumstances are not supported by the hosted application, they will be redirected to the HealthCare.gov Pathway or a partner's Classic Private Partner Website Pathway.
  - After being redirected, these consumers may need to re-enter minimal information on the application.

Private Partner Website Pathway: Enhanced Year-Round Client Management Functions

- Private partners offering enhanced functionality may offer a range of client management functions for you to more easily assist consumers year-round. These capabilities may vary, but will generally include the ability to:
  - Complete and update the application
  - Upload documents to adjudicate data-matching issues (DMIs) and special enrollment period verification issues (SVIs)
  - View the status of DMIs and SVIs
  - Download Marketplace notices, such as the Eligibility Determination Notice (EDN) and Form 1095-A
  - Make initial binder payments
  - Submit enrollments

- To find out more about specific features, you should contact the issuer or web-broker directly.

Enrolling Through a Private Partner's Website (Enhanced)

- You may assist the consumer with creating an account on the issuer's or web-broker's website. However, the consumer's log-in credentials should not be shared with or used by you. Similarly, your log-in credentials to a private partner website should not be shared with or used by others.
- If you are assisting in person or over the phone, the consumer may not be required to create an account.

Enrolling Through a Private Partner's Website (Enhanced) (Continued)

- You assist the consumer with identity proofing.
- You must check the consumer's ID by reviewing approved documents on the consumer's first in-person visit and certify that you have done so.
  - If the consumer creates an account on the issuer's or web-broker's website after you verified his or her identity in person, and the issuer or web-broker tracks that the consumer's identity was verified, the consumer does not need to complete identity proofing again.
- A guide to documents that can be used for ID proofing can be found in Appendix A.

Enrolling Through a Private Partner's Website (Enhanced) (Continued)

- You assist the consumer with the application. The application asks for the same consumer information as on HealthCare.gov.
  - Consumers have the ultimate legal responsibility for completing their applications and attesting to the accuracy of the information contained therein.
  - If there is an existing Marketplace application, the consumer will update the existing application.
- For some partner websites, you may have to help the consumer complete a set of screening questions to verify the application functionality available on the EDE partner's website can support the consumer's circumstance.

Enrolling Through a Private Partner's Website (Enhanced) (Continued)

- The completed application is submitted to the Marketplace for an eligibility determination.
- Eligibility results are displayed on the partner's website, along with the EDN.

Enrolling Through a Private Partner's Website (Enhanced) (Continued)

- If the consumer is eligible to enroll in a QHP, you assist the consumer with selecting a plan on the partner's website.
- Some, but not all, partners may support enrollment in catastrophic coverage.

Enrolling Through a Private Partner's Website (Enhanced) (Continued)

- Some partners may offer functionality to redirect consumers to a separate payment website for the initial premium payment.

Enrolling Through a Private Partner's Website (Enhanced) (Continued)

- Information on DMIs or SVIs is available through the partner's website.
  - You will be able to view the status of DMIs and SVIs, and track them to resolution.
  - You may assist consumers with uploading documents to resolve a DMI or SVI through the partner's website.
- You will also be able to view notices related to DMIs, SVIs, and Form 1095-As.

Finding an Approved Private Partner

- You must use an approved issuer or web-broker to access the new, enhanced private partner enrollment and client management capabilities.
- You may find an issuer or web-broker that is approved to offer these services via the Private Partner Enrollment and Client Management Capabilities Directory.

Each Directory listing contains:

- Partner name
- State(s) in which the partner operates
- Level of service offered (e.g., classic functionality, simplified or expanded application capabilities)
- Service availability (i.e., year-round or only during the Open Enrollment Period)
- Issuer agent/broker contact information
- Information on whether a partner offers Small Business Health Options Program (SHOP) plans and/or stand-alone dental plans

- The Directory also has information on DE partners that only offer the Classic Private Partner Website Pathway (with the redirect to HealthCare.gov) and are interested in working with the agent and broker community.

How CMS Approves Private Partners

- Before any partners are approved, a third-party auditor conducts extensive security and privacy reviews and audits.
- CMS reviews:
  - The audit results to ensure compliance with nearly 300 CMS security and privacy standards;
  - The partner's system security plans and the analysis of their system testing protocols; and
  - The results of business logic audits, ensuring that a partner's system will accurately convey consumer information to the Marketplace that will be used to determine the consumer's eligibility.

- If a partner fails to meet any of these standards, CMS will immediately terminate the connection, stopping any consumers from entering the subject partner's enhanced application functionality pathway.

Improvements to the Enhanced Direct Enrollment Pathway

- CMS plans to continue to add more private partners to EDE so agents and brokers have more enrollment pathway choices to use when assisting consumers to enroll in Marketplace coverage.
- By the Open Enrollment period for plan year 2020, EDE will launch with new messaging capabilities that will make it easier to manage consumers year-round and communicate directly with consumers.

Appendix A: Approved Document Types for ID Proofing

Tier 1 – Documents that may be submitted alone for verification	Tier 2 – If individual does not have a Tier 1 document, submit two Tier 2 documents
• Driver's license issued by state or territory • School ID card with photograph • Voter registration card • U.S. military card or draft record • ID card issued by federal, state or local government • U.S. passport or U.S. passport card • Certificate of Naturalization (Form N-550 or N-570) or Certificate of Citizenship (Form N-560 or N-561) • Permanent Resident Card (Form I-551) • Employment authorization document that contains a photograph (Form I-766) • Foreign passport or identification card issued by a foreign embassy or consulate that contains a photograph • Military dependent ID card • Native American tribal document • U.S. Coast Guard Merchant Mariner card	• Birth certificate • Social security card • Marriage certificate • Divorce decree • Employer ID card • High school or college diploma or transcript • Property deed or title

Using Private Partner Websites to Enroll Consumers in Marketplace Coverage

How Consumers Can Connect Private Partner Website Pathway Applications to HealthCare.gov Accounts

Steps for a Consumer to Create a HealthCare.gov Account

Consumers whom you assist using the Classic or Enhanced Private Partner Website Pathways may not yet have a HealthCare.gov account and may wish to create one so they can access their Marketplace notices, upload documents, or update their application(s) directly.

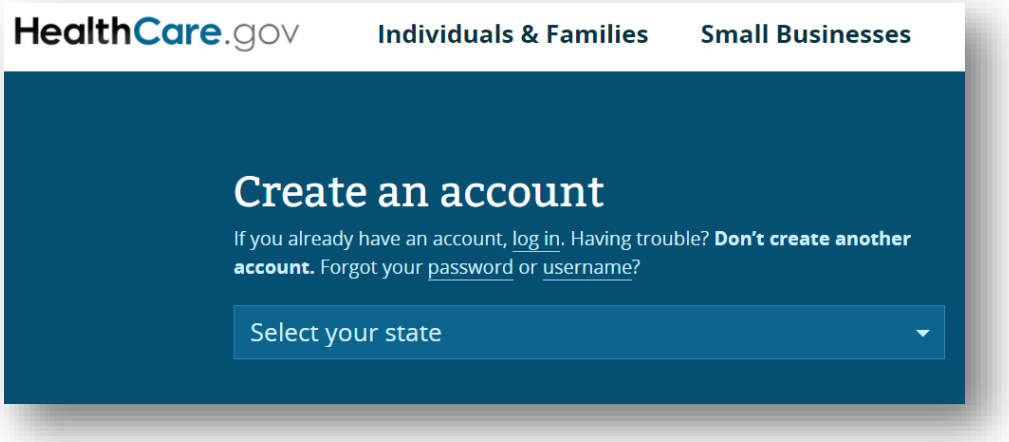
Private Partner Website Pathway: Classic

- You can access your clients' EDNs.
- Only consumers can access other Marketplace notices and Form 1095-As.
- Consumers can access their notices or forms only through HealthCare.gov or by mail.

Private Partner Website Pathway: Enhanced

- You can access your clients' Marketplace notices and Form 1095-As.
- Consumers may also create a private partner or HealthCare.gov account to access these notices and forms directly.

Steps for a Consumer to Create a HealthCare.gov Account (Continued)



Guide your clients in completing these steps to create a HealthCare.gov account:

1. Go to https://www.healthcare.gov/create-account.
2. Enter some basic information (e.g., name, address, email address).
3. Choose a username and password.
4. Create and answer security questions for added protection.
5. Select **Create Account**.
6. The client must verify his or her identity by answering questions based on information in his or her own credit report.

Steps for a Consumer to Create a HealthCare.gov Account (Continued)

To help your clients connect an enrollment completed via the Classic or Enhanced Private Partner Website Pathway to a HealthCare.gov account, guide them in following these simple steps:

1. After logging in to their HealthCare.gov account, consumers should select their name at the top-right corner of the page, and select **My Applications & Coverage**.
2. Select **Find my application**.
3. If these consumers have not verified their identity yet, they will need to verify their identity before being able to continue.
4. After successfully verifying their identity, consumers should click **Enter Application ID** to proceed to the application search page.
5. On the application search page, consumers should enter their Application ID, coverage year, and application state, and then select **Continue** to proceed with finding their application.

Using Private Partner Websites to Enroll Consumers in Marketplace Coverage

Other Marketplace Updates

Upcoming Activities

- The slides from this webinar will be available on the Registration for Technical Assistance Portal (REGTAP) at www.REGTAP.info and on the Agents and Brokers Resources webpage at http://go.cms.gov/CCIIOAB in the coming days.
- **Periodic webinars** will continue through 2019 to help you **enhance your knowledge** of Marketplace policies and **how you can continue to assist your clients** throughout the plan year.
- CMS will also host **monthly agent and broker Office Hours** for you to ask questions and share observations about your Marketplace participation.

Upcoming Events*   **Mark your calendars for these dates and times.**
Office Hours: Thursday, July 11 2-2:30 PM ET
Assister Webinar: Friday, July 12 2-3 PM ET
Assister Webinar: Friday, July 26 2-3 PM ET

**Final webinar topics will be announced prior to each session.*

Acronym Definitions

Acronym	Definition
CCIIO	Center for Consumer Information and Insurance Oversight
CMS	Centers for Medicare & Medicaid Services
DE	Direct Enrollment
DMI	Data Matching Issue
EDE	Enhanced Direct Enrollment
EDN	Eligibility Determination Notice
FFM	Federally-facilitated Marketplace
MLMS	Marketplace Learning Management System
QHP	Qualified Health Plan
REGTAP	Registration and Training Technical Assistance Portal
SHOP	Small Business Health Options Program
SVI	Special Enrollment Period Verification Issue