



Silver State Health Insurance Exchange

2310 South Carson Street, Suite 2 Carson City, NV 89701 T: 775-687-9939 F: 775-687-9932

www.nevadahealthlink.com/sshix

AGENDA ITEM

For Possible Action

Information Only

Date: February 14, 2019
Item Number: VI
Title: State Based Exchange Transition Update

PURPOSE

This agenda item is being submitted to provide the Board of Directors with an update on the progress of Nevada’s State Based Exchange Transition Project.

CONTENTS

PURPOSE	1
CONTENTS	1
PROJECT MANAGEMENT OFFICE UPDATE	1
VENDOR UPDATE.....	3
CARRIER UPDATE.....	3
PMO UPDATE	4

PROJECT MANAGEMENT OFFICE UPDATE

Project Status – For the first time in this project, the status is Yellow as a result of two issues that are dependent on the Centers for Medicare and Medicaid (CMS). While we are working collaboratively to resolve these issues and are hopeful that they will come to a resolution in the very near future, it is important for the board to know that these risks exist

It is not uncommon for a project of this size to go between a Green status and a Yellow status or even dip momentarily into Red. The colors are used as tools to heighten awareness of risks and issues to be mitigated. Two high impact risks have been registered and reported and are the reason for our current Yellow status:

- CMS’ Authority to Connect (ATC) target achievement dates, and:

- Final determination of the methodology to be used for migrating Application Data from the Federal Data Services Hub (FDSH) to the Silver State Health Insurance Exchange (SSHIX).

In Project Management terms, the ATC to the FDSH is on the critical path for this project. It is required in order for GetInsured (GI)/SSHIX to receive consumer data from the FDSH, which in our case is through the Division of Welfare and Supportive Services (DWSS) Proxy Server, which will be the SSHIX connection to the FDSH once the system is live. There are a number of steps that are required to be completed on the path to achieve the ATC. One is the creation of the System Security Report (SSP) for SSHIX. This will include documentation regarding security controls from GI, DWSS as well as SSHIX. Next, once ready for review, our SSP will be presented to an independent group to complete a Security Assessment Report (SAR) which is then presented to CMS for their review, ultimately giving us the Authority to Connect our system to their system.

Every State Based Exchange is required to conduct a security assessment based on the criteria of the Minimum Acceptable Risk Standards for Exchange (MARS-E, which defines 17 families of security controls in three classes). It is industry standard that this be completed by an independent, possibly contracted, group/vendor. In October /November of 2018 SSHIX conducted a Request for Proposal (RFP) and after thorough review of proposals from a number of possible vendors, SeNet received the highest score and was awarded the contract to conduct the assessment. The contract was approved by the Board of Examiners on 1-5-19 and the project kickoff was held 1-30-19.

One very attractive advantage of selecting SeNet was their ability to conduct the vast majority of the assessment remotely with our provided System Security Plan (SSP) so that they can review the document in their offices, resulting in tremendous savings on travel expenses.

Because of our unique configuration of having to share a single connection with DWSS to the FDSH due to CMS single Partner ID restrictions, we need to complete an SSP that includes controls within GI, DWSS as well as our own in SSHIX. Our Information Security Specialist is targeting 2-15-19 for the completion of the SSHIX SSP package for delivery to SeNet who in turn are targeting 4-16-19 to complete the assessment and deliver to us the Security Assessment Report (SAR) for our presentation to CMS, who require up to 90 days to review. This brings us close to August for a target CMS approval and ATC, which is challenging our project schedule.

The next risk being mitigated is the determination of the methodology to be followed to migrate consumer data. We have consumer data separated into three logical groups, Application Data, Enrollment Data and Agent/Broker Data. The Application Data has been the most challenging of the three. The requirement of the completed ATC prior to allowing any data transmitted via the DWSS proxy server as well as possible configuration modifications to the DWSS proxy server have complicated matters considerably. Our intention has always been to not burden DWSS with

large amounts of work for the initial transmissions of this data, a process that will only be conducted three times.

As of 2-05-19, at a meeting with representation from SSHIX, GI and CMS, a preferred path forward was agreed upon. CMS will propose to their leadership a temporary connection from the FDSH directly to GI, bypassing DWSS, with the ATC required only for the August and October scheduled transmission of Application Data and not required for the April/May test data transmission. This temporary connection would be time limited with no expectation of need in the future. This allows us to move forward and not involve DWSS for this aspect of the work, something they will greatly appreciate.

CMS has agreed to propose this methodology to the appropriate levels within their organizations with a high level of confidence it will be approved. We have set a target date for approval of 2-22-19, at which time failure to approve will cause us to fall back to an alternate method. When/if they approve this methodology, we will have mitigated both High Impact Risks and will return to a Green status for the project.

Vendor Update

The first vendor milestone for 2019 will be the acceptance of the Test Environment by 3-31-19. GI has been building this environment, preparing it for the project since late December 2018. Once delivered we will be in a position to begin Electronic Data Interchange (EDI) testing with the Carriers on 4-1-19 along with other testing that will be running concurrently. Apart from the Milestones, GI is hard at work giving attention to;

- Acquiring the plan year 2019 data from Carriers for testing proposes
- Working with our ISS to complete their SSP for inclusion to our SSP
- Working on test scenarios for Carrier EDI testing
- Reviewing their EDI Companion Guide for Carriers
- Preparing for Application, Agent Broker and Enrollment Data migration
- Coordinating with SERFF for connectivity & testing
- Working with DWSS to finalize Proxy Server connectivity
- Completing Account Transfer User Stories
- Working on the Consumer Assistance Center details

Carrier Update

SSHIX has scheduled regular monthly meetings with Carrier representatives with the goal of keeping them apprised of the project status and listening to their questions and concerns. We also have set up a series of meetings with the carrier identified technical teams to address specifics of the project. The three current focus areas are EDI testing, Reconciliation and Workbook /Policy Based Payments. We had our first technical meeting in January and our next meeting is scheduled for mid to late February where we will continue to discuss GI's EDI Companion Guide and start to discuss EDI Test Scenarios.

We have begun to gather approval from the Carriers to use their Plan Year 2019 SERFF data for testing purposes between GI and the Carriers.

PMO Update

What began with a Senior Project Manager (PM) and an Information Security Specialist (ISS) on 8-15-18 has now grown to include a Quality Assurance Lead (QA) tasked primarily with building and executing a User Acceptance Test (UAT) plan which starts 4-01-19 and continues through 6-21-19. We welcomed Stephen Ostien to the team on 1-03-19. Additional duties include providing validation and verification of both test methodologies as well as test result tracking and resolution by the Vendor. Steve is fully engaged with reviewing EDI test scenarios with GI and providing valuable insight and suggestions to improve the documentation that will be provided to the Carriers to support EDI testing.

We are currently scheduled to bring on our second QA staff and Document Technical Writer on 6-01-19 followed our third QA staff on 8-01-19. These dates could change to address specific needs should needs and funding allow.

Our ISS is very busy reviewing SSP control documents from our vendor GetInsured and from the DWSS as well as coordinating control documents provided by SSHIX. He is targeting completion of the SSP by 2-15-19 and will be a key contact for our MARS-E assessment vendor, SeNet.

The winter continues to be busy and the spring and summer are on schedule to be even busier. We look forward to getting back to a Green status and working to be able to stay there through Open Enrollment in December.