AGENDA ITEM

☐ **For Possible Action**

☒ **Information Only**

Date: June 13, 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.

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VENDOR UPDATE

GETINSURED TECHNOLOGY PLATFORM

During development of the State Based Exchange (SBE) Transition project, a Go/No Go milestone was defined, dated May 31, 2019 and would allow for the halting of the project – if necessary - with little to no interruption to carriers currently doing business with the Silver State Health Insurance Exchange (SSHIX, often referred to as the "Exchange"). The Exchange is pleased to report to the Board of Directors that the vendor has successfully met the project criteria to allow the declaration of the SBE project a "GO."

One of the foundational challenges of this project is the migration of the application and enrollment data from the HealthCare.gov platform to the GetInsured (GI) platform. In order to move past the Go/No Go decision, the Exchange had to prove that the Centers for Medicaid & Medicare Services (CMS) could successfully migrate Nevada consumer data to SSHIX and that GI could consume the data and essentially populate our Exchange database with consumer application and enrollment data. To demonstrate success, the Exchange requested GI create a report that analyzed the two sets of migrated data and demonstrated that they were able to combine the application and enrollment data and match up specific information from CMS. In short, the Exchange was able to prove that CMS would be able to successfully migrate the application and enrollment data over to the GI technology platform so that GI could consume the data in order to build the basis for a fully functional SBE.

The Exchange and PMO have had a difficult time reaching an agreement with CMS regarding the timing of the data migration. CMS recently informed the Exchange that plans to allow consumer to make changes to their applications during the month of September and October would not be feasible and risked causing the two technology systems (theirs and ours) to become out of synch. After a fair amount of work on the part of the Exchange and GI timing for data migration has been solidified, as has the specifications around what consumers will be allowed to modify on their migrated user accounts prior to open enrollment. On September 4, 2019 consumers will be invited to NevadaHealthLink.com to claim their accounts and verify their information. Once logged in, consumers will be able to designate an agent/broker and will be encouraged to "opt in" to auto-renewal (which will take place starting October 15th). This is a slight change from allowing the consumers to make changes to their accounts as previously planned. The Exchange will maintain the September 4th soft-launch date as originally scheduled.

The current Project Dashboard Report, that is sent to the Exchange and GI from the PMO on a weekly basis, is back to presenting a Green status. As previously stated, it is not uncommon for a project of this size to be in a Yellow status or even dip periodically into Red. As more and more tasks go into play, more obstacles or challenges can arise. The colors are used as tools to heighten awareness of risks and issues, document them, and to ensure aggressive and appropriate mitigation.

Two low impact risks have been registered and reported and their mitigation is the reason for the return to Green status. The low impact risks are as follows:

Risk #1

Milestone # 4 (GI Test Environment), due 3/31/19, was delivered incomplete. This has directly affected the ability of the PMO to conduct User Acceptance Testing (UAT). The fully functional Test Environment is now expected 7/01/19.

GetInsured (GI) is taking a new approach in which the different environments for this project will be available. GI has set a release schedule for the Production System which will be delivered on June 10th. The release to a production system means GI will release updates to the Training environment and the UAT environment prior to Production. It is normal to have various enhancements to a system that is "staged" prior to being made available to the "Production" environment. This means that the UAT environment will be leveraged as a "Staging" environment, and serve a dual purpose of also being a UAT platform. These changes affect the systems that are currently linked to the contracted delivery dates to instead be linked to the release dates supporting production.

Key dates:

- **June 10 – 19.6 Release – Production System available**
- **July 15 – Brokers begin claiming accounts**
- **Sept. 4 – Consumers claim accounts**
- **Oct. 1 – Anonymous shopping available**
- **Oct. 15 – Auto-Renewal**
- **Nov. 1 – Open Enrollment Period Begins**

Although the key dates are essentially a deviation from contractual stipulations, this plan is a more focused and organized methodology to address and support the Production environment, which in turn mitigates risk.

Risk # 2

The Authority to Connect (ATC) to the Federal Data Services Hub (FDSH) has made solid progress with the completion of the Security Assessment Report by our vendor: SeNet. They have used the required MARS-E 2.0 standards to review the SSHIX System Security Plan. SeNet is currently in the process of writing their assessment and plans to deliver the assessment to the Exchange on June 7th. In turn, the Exchange will present the report to CMS for their review.

Along with the submission of the assessment report to CMS, SSHIX is required to submit documentation to the Internal Revenue System (IRS) for their approval to connect to the IRS to obtain and retain federal tax information. After considerable effort and review by Russell Cook, the Exchange's Information Systems Officer (ISO), the required documentation was submitted to the IRS for review.

The outstanding risk remains in CMS' and the IRS' hands; both entities must review submitted documentation and promptly process SSHIX's authority to connect to CMS and the IRS.

TESTING STATUS

The GI & SSHIX contract calls for the PMO to conduct UAT while GI is responsible for all other testing, however SSHIX has prioritized carrier testing of Electronic Data Interchange (EDI) to ensure the maintenance of strong relations with one of the agency's most important stakeholders.

In working with multiple other state exchanges, it has been my experience that EDI comes with a vendor-specific list containing explicit requirements. Chosen technology vendor, GI, is no different. Those requirements come in the form of a "Companion Guide" which was provided to the insurance carriers early in the process. Some carriers have required more time than others to adjust to new requirements and the Exchange has allowed for their requested needs within the scope of the project.

In an effort to support the carrier request to have more time within the EDI timeframe, the Exchange made adjustments by splitting EDI testing into three time periods:
1. 4/01/19 – 5/31/19 – original dates for EDI testing
2. 4/29-19 – 6/28/18 – allowing time for adjustments to the GI Companion Guide
3. 7/01/19 – 8/30/19 – for those insurers requiring to test with Plan Year 2020 data

While the EDI testing in general is progressing, the Exchange has identified some anomalies requiring unique solutions.

User Acceptance Testing (UAT) has required considerable re-engineering on the part of SSHIX. The PMO has developed "Use Cases" organized by role that describe the expected functionality, from there the PMO has developed "Test Cases" which are scenarios by which the system's response is tested. These "Use Cases" will also serve to support the Training and Implementation Specialist and the Technical Document Writer in their PMO roles as they develop training and reference material.

PMO Status

The Project Management Office has grown as planned, however the Security Specialist responsibilities have been shifted to the Exchange's ISO, Russell Cook. The Exchange hired a second Quality Analyst (QA) to work with our existing QA Lead on EDI and UAT testing. Recently, the Exchange hired a Training Implementation Specialist to create the necessary training documentation, both digital and paper based for onboarding brokers and enrollment assisters. Part of this work will be enhanced by the new Document Technical Writer position, who is being tasked with various technical writing requirements such as desk manuals and plan certification manuals. The entire team has hit the ground running and I believe we have engaged highly experienced and knowledgeable people who are more than well qualified for the challenges of this project. They have quickly demonstrated their added value to the PMO.

The project status is currently Green. The entire SSHIX staff and PMO feel more confident than ever of the success of this SBE Transition Project.