

March 27, 2015

Board of Directors  
Connect for Health Colorado  
3773 Cherry Creek N. Drive, Suite 1025  
Denver, Colorado 80209

Re: Interoperability Framework and Recommendations

Dear Connect for Health Colorado Board of Directors,

The undersigned organizations appreciate the work that both Connect for Health Colorado (C4HCO) and the Department of Health Care Policy and Financing (HCPF) have undertaken to fix the current problems with the shared eligibility system (SES). We have had regular conversations with multiple stakeholders who have assisted individuals with enrollment in Medicaid and C4HCO, and we recently solicited their views on the successes and challenges of the most recent open enrollment period. This letter reflects our concerns and suggestions about priorities moving forward.

We are very concerned that there simply is not sufficient time to implement and ensure adequate training on the proposed SES system upgrades. In our view, there are several priority fixes which should be completed while C4HCO and HCPF continue to explore a longer term solution, as referenced in the "Joint Recommendation for SES Upgrades" shared at the March 20<sup>th</sup> Board Operations Committee meeting. These fixes include:

1. Building the option to edit or delete an application. When a mistake has been made, consumers should be able to fix the error, or even delete and start over. Currently consumers are unable to go back and correct an error even if they know that their information was incorrectly entered. This was identified as a top priority by those people we spoke to who worked with SES.
2. Simplifying some of the questions on the SES.
  - a. SES questions regarding a consumer household are particularly confusing. Clear wording emphasizing that information is needed about the applicant's tax filing household and not the physical household would benefit consumers. This fix is currently identified as a medium or low priority; we believe it should be given a higher priority.
  - b. The current questions regarding customers' previous insurance status and possible individual mandate exemptions should be removed. Customers who answered these questions truthfully, even though they were attempting to purchase insurance to prevent a gap in coverage, may have received an incorrect financial assistance eligibility determination. This fix is also currently identified as a medium or low priority, but should be given higher priority.
  - c. Customers are confused by the question "Are you applying for Medical Assistance?" This question should be worded to ensure that consumers know they are in the right place to apply for Medicaid or for Advanced

Premium Tax Credits. This fix is currently identified as a very high priority.

Whatever solution the Board adopts, we strongly urge C4HCO and HCPF to actively solicit input from assistance sites throughout the process to implement changes in SES application flow. Now veterans of two open enrollment periods, health coverage guides and other assisters have extensive knowledge of troublesome sections of the process as well as a tool belt of workarounds that have been used to expedite eligibility determinations. Incorporating this knowledge will lead to a smoother application process for consumers.

Equally important, there must be sufficient time for testing and training on the system. In previous years, training for assisters has been done without complete access to the eligibility system that was used during the open enrollment period. All assisters need to be comfortable with the new system design and confident in their ability to reach a correct eligibility determination for customers. We urge C4HCO to set a firm date by which the SES and any other website designs will be completed, well in advance of the start of the next open enrollment period, to accommodate time for training. If it comes to the point of starting training on the SES upgrades or continuing to implement more fixes, we would prioritize training to create the best experience for customers and application sites during the open enrollment period.

Finally, given complex family situations, there will always be some consumers that do not receive a real time determination even with the best of IT systems. There are several ways to ensure that consumers nevertheless have an exceptional experience while their financial assistance application status is being resolved:

1. In the spirit of the 'No Wrong Door Policy', customers calling any call center should be able to have their issues meaningfully addressed. If a bifurcated process does need to exist, the assistance network and outside stakeholders need a clear delineation of where to go for help. With the uncertainty of the status of MAXIMUS as well as current conversations around C4HCO's call center, we urge C4HCO and HCPF to collaborate and release clear guidelines about where to direct consumers for assistance and even create a system that would allow for warm hand-offs.
2. Assistance sites need a secure method to communicate with a call center that allows them to exchange information about the customer's application. Without this ability, an application assister and the call center are unable to confirm that their computer screens show the same information.
3. Assistance sites should be able to check on the status of a customer's application. If an assistance site is able to periodically check on an application, this improves the ability of the customer to know when to plan to shop for insurance and frees an assister from scheduling an appointment when they are still unable to progress on the application.

In summary, we believe there are critical immediate fixes that should be implemented before open enrollment begins and longer-term fixes to the SES can be sufficiently deliberated, properly planned and implemented later. We are committed to continuing to partner with C4HCO and HCPF and submit feedback to improve the C4HCO customer experience.

Sincerely,

Colorado Consumer Health Initiative  
Colorado Center on Law and Policy  
Colorado Coalition for the Medically Underserved

cc: Gary Drews, C4HCO Interim CEO