

Federally Facilitated Exchanges and Application Interfaces An Overview for Discussion Purposes



25 January 2013

Web-Broker API: Technical Validation Session

Overview

- Presenters today:
 - Peter Nakahata and Andrew Rumin CCIIO, CMS
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- Purpose: Provide walkthrough of API design, and receive technical comments from industry experts
- Background and context for the web-broker API
- Overview solution approach
- Consumer workflow
- Key Interaction Scenarios
- Receive feedback and answer questions



Background

- Consumers can shop for Health Insurance on the FFE, or on a Web-Broker or Issuer's website
- To extent permitted by a state, HHS intends to work with webbrokers that meet applicable requirements to help consumers select QHPs online.
- API allows for consumer to approach web-broker website and:
 - receive an eligibility determination from FFE;
 - select QHP on the web-broker's website; and
 - enroll in a QHP through the FFE.



Background – Federal Rules (45 CFR 155.220)

- Like other agents/brokers, web-brokers must be registered with FFE, receive training, be licensed and execute an agreement with HHS.
- Web-broker specific requirements:
 - Meet all standard for disclosure/display of QHP information;
 - Provide consumers the ability to view all QHPs offered through the Exchange;
 - Not provide financial incentives (e.g. rebates/giveaways);
 - Display all QHP data provided by Exchange;
 - Maintain audit trails for 10 years minimum;
 - Provide consumers with ability to withdraw and use Exchange website.
- CMS will likely specify additional expectations.



Solution Approach

- FFE will expose its business services to Partner Websites for Eligibility determination, Searching and comparing QHPs, Enrollment, Disenrollment and reporting changes
- Eligibility determination for financial assistance requires access to FTI. IRS regulations prohibit access to FTI from Web Broker/ Issuer systems.
 - Consumer will be routed to the FFE website for collecting personal and financial information (Cannot use a web service since Partner Websites are not allowed collect or display FTI)
 - FFE will also capture pre-enrollment attestations directly from the consumer
- Given the above, the FFE API will include HTTP redirects and web services
 - Account creation, Application submission, Eligibility determination and attestations would be performed on the FFE via HTTP redirect
 - QHP shopping, enrollment, enrollment changes and disenrollment would be performed through web services
 - All web services will be exposed through the Data Services Hub



Consumer Workflow





Key Interaction Scenarios

Scenario #	Scenario Title
1	New QHP Enrollment (with or without financial assistance)
2	Consumer returns to continue shopping
3	Consumer reports changes impacting eligibility
4	Consumer reports changes not impacting eligibility
5	Consumer reports changes resulting in Disenrollment
6	FFE Initiated Disenrollment
7	Voluntary Disenrollment by consumer



Interaction Scenario #1 – New Consumer



New QHP Enrollment (with or without financial assistance)



Interaction Scenario #2 – Returning Customer





Consumer returns to continue shopping

Interaction Scenario #3 – Changes (1)



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Consumer reports changes impacting eligibility

Income, Addition or removal of household members



Interaction Scenario #4 – Changes (2)



Demographic changes, Income (if within same eligibility range)



Interaction Scenario #5 – Changes (3)



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- **Consumer reports changes leading to Disenrollment**
- Eligible for Medicaid/CHIP, Lost eligibility for QHP, Lost eligibility for APTC/CSR₁₂

Interaction Scenario #6 – Disenrollment (1)



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FFE Initiated Disenrollment



Interaction Scenario #7 – Disenrollment (2)



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Voluntary Disenrollment by Consumer



Interfaces

Interface	Description
Transfer Consumer to FFE for Account Creation and Eligibility Determination	This HTTP redirect interface will transfer the consumer from the Partner Website to the FFE for account creation and eligibility determination. This will establish a link between the consumer's accounts on the Partner Website and the FFE.
Transfer Consumer back to Web Broker/Issuer	This HTTP redirect interface will transfer the consumer from the FFE to the Partner website after completion of the eligibility determination process. This interface will also be used in other situations such as on the consumer's intent to return or exceptions such as failure to create an FFE account due to failure in RIDP. The FFE will transfer the consumer to the Return URL provided by the partner website while transferring the consumer to the FFE.
Transfer Consumer to FFE to Continue Application	This HTTP redirect interface will transfer a returning consumer from the Partner website to the FFE. In this case the consumer would have already created accounts on the Partner website and the FFE and the link would have been established. The consumer will continue from the last step they were at during the previous session.
Transfer Consumer to FFE for Enrollment Attestations	This HTTP redirect interface will transfer the consumer from the Partner website to the FFE to collect pre-enrollment attestations.



Interfaces (Contd.)

Interface	Description
Fetch Household/ Eligibility Details	This FFE Web service will return details of all members in household requesting coverage along with their eligibility for financial assistance. Eligibility information returned will include Medicaid/CHIP eligibility and eligibility for APTC/CSR. Demographic information for the members required for enrollment will also be included.
Fetch List of QHPs	This FFE web service will return a list of QHPs that match the search criteria specified by the consumer on the Partner website. Search criteria could include household composition, premium cost range and any special health coverage requirements.
Fetch QHP Details	This FFE web service will return detailed plan information for a QHP selected by the consumer on the Partner web site.
Fetch Side by Side Compare of QHPs	This FFE web service will return a tabulated response with a side by side comparison of a list of selected QHPs on a variety of factors such as cost, coverage area and benefits.



Interfaces (Contd.)

Interface	Description
Submit Enrollment	This FFE web service will process an enrollment request from the Partner website. The information included in this request will be used for sending the 834 enrollment transaction to the issuer.
Submit Enrollment Change	This FFE web service will process an enrollment change request from the Partner website. Enrollment change requests include:
	Adding or Removing a member
	Changing QHPs
	Change in eligibility status
	The information included in this request will be used for sending the 834 enrollment change transaction to the issuer.
Submit Disenrollment	This FFE web service will process a disenrollment request from the Partner website. The partner website will invoke this service for FFE initiated disenrollments, Consumer reported changes resulting in disenrollments and voluntary disenrollments by the consumer
	The information included in this request will be used for sending the 834 dis- enrollment transaction to the issuer.



Questions and Comments

 Questions/comments and open discussion from industry experts

