

# Eligibility and Enrollment Platform Summary

June 7, 2018



# Eligibility and Enrollment Platform Overview



## **Oregon currently uses the federal enrollment platform technology and call center**

- Known as the federally facilitated marketplace (FFM), used by Oregon since 2014 for plan year (PY) 2015
- Web-based application, eligibility, and enrollment system; database
- Handles call center support
- Starting PY 2017, the FFM charges a user fee paid by insurers that is embedded in consumers' premiums
- Calculated as a percentage of total premiums for qualified health plans (QHPs) and stand-alone dental plans sold through the FFM

# Eligibility and Enrollment Platform Overview



## Committee's interest in this topic

- Increasing fees have caused concern for the committee
- Fee assessed as a percentage of premium, increased FFM fees are passed to Oregon consumers in premium rate filings
- Limitations to Oregon QHP/SHOP enrollment self-determination and innovation presented by inflexible platform
- 50% increase in rate from 2017 illustrates cost jumps
- Rising FFM costs and changing technology landscape make an updated cost-benefit assessment of alternatives the logical next step

# Eligibility and Enrollment Platform History



- 2014-2015: Oregon moves to the FFM for PY 2015
  - Adopts state-based exchange (marketplace), federal platform model (SBE-FP or SBM-FP).
  - No charge to SBM-FP states for PY 2015 and 2016
  - To date, pure federally facilitated exchange states (FFE, no state-based components) have paid 3.5%
- March 2016: Final CMS 2017 Notice of Benefit and Payment Parameters (NBPP) rule released

# Eligibility and Enrollment Platform History



- Estimated cost for FFM at 1.5% in PY 2017: **\$10.6M**
- December 2016: Final 2018 NBPP sets user fee at 2% for SBM-FPs
- Estimated cost for FFM in PY 2018: **\$15.6M**
- April – Aug. 2017: CMS shortens open enrollment (OE) to end Dec. 15, halving enrollment period. Enrollment promotion spending reduced to \$10M from \$100M. No changes to fee.
- April 2018: Final 2019 NBPP increases fee to 3%
- Estimated cost for FFM in PY 2019: **\$28.4M**

# Eligibility and Enrollment Platform 2016 Marketplace RFP



## **2016 Marketplace SHOP/Enrollment technology RFP**

- An RFI for SHOP alone had been conducted in the spring of 2015
- Marketplace began an assessment of alternatives after a proposed 3% FFM user fee in the 2017 NBPP
- The RFP was issued in December 2015, seeking vendors for an enrollment technology solution only
- Four proposals were received by March 4, 2016 deadline, three met minimum requirements

# Eligibility and Enrollment Platform 2016 Marketplace RFP



**An advantages and disadvantages comparison showed mostly benefits to Oregon, but the primary deciding factor was cost**

- Forecast comparisons were made against an assumed ongoing 3% user fee for the federal technology platform
- The average proposed cost of the technology was **\$8.61M** per year. All three proposers were within \$0.4M of the average.
- **Added Oregon Marketplace costs:** estimated 80 additional FTE and associated costs needed to operate an Oregon-based technology, and additional publicity and publications support lost from FFM. Estimated in addition to existing budget forecast of \$11.9M: **\$13.2M**

# Eligibility and Enrollment Platform 2016 Marketplace RFP



**In May of 2016, after a decision from the advisory committee, the Marketplace decided against initiating a move to a state-based technology**

- With the additional staff needed, forecasts estimated \$30.7M in combined annual costs remaining with the federal platform, and \$33.8M annually to switch to a state-based technology
- At that time, these numbers were just under and just over 5% of total premium respectively, which is the statutory threshold for the total insurer assessment



# Eligibility and Enrollment Platform Present State



## What the federal technology platform does for Oregon

- Provides web-based application, enrollment, and cost estimation, tied to enrollee database
- Provides call center for live enrollment and application assistance, and post-enrollment support
- Handles enrollment data exchanges for application information verification and with insurance carriers for enrollee information
- Outreach and advertising support – which changed a great deal last year, and there is less certainty about this now

# Eligibility and Enrollment Platform Present State



## Benefits of using the FFM

- It works
  - Provides basic eligibility and enrollment functionality
  - No unplanned downtime during OE 2018 (serving slightly fewer enrollees in half the time from previous year)
- No Oregon FTE's dedicated just to enrollment support
- Oregon does not need a connection to the federal data hub for the Marketplace (there is one for OHP)
- Participating insurers are already connected to the FFM
- The FFM assumes the effort and risk of maintenance, and of making improvements and enhancements

# Eligibility and Enrollment Platform Present State



## Challenges to using FFM

- Accountability to Oregon taxpayers for cost
  - Lack of transparency into operational cost details
  - Unable to measure the actual value of services received compared to the fees paid
- User fees set as a percent of total premium
  - Fee is tied to premium rates, rather than cost to operate
  - No data to compare actual technology cost per enrollee against what is paid in fees

# Eligibility and Enrollment Platform Present State



## Challenges to using FFM

- No customization/inability to implement state-specific features
  - COFA or similar programs
  - Open enrollment, SEPs, termination guidelines
- Lack of knowledgeable call center staff
  - Hundreds of Marketplace, agent, and assister staff hours spent helping consumers navigate the FFM call center for escalated cases, application error resolution, unique circumstances
  - Poor customer service experiences frustrate Oregon consumers

# Eligibility and Enrollment Platform Present State



## Challenges to using FFM

- No control over length of time to correct data/system errors
- No oversight capability to help manage churn between OHP and/or small group coverage
- No control over frequency and types of enrollment metrics, or data that can be accessed by Marketplace staff

# Eligibility and Enrollment Platform



## Discussion