



# FINANCE & OPERATIONS COMMITTEE

Potential Impact of Proposed Changes  
February 27th, 2017

# Potential impacts of CMS proposed rule changes

Item	Technology / Operational implications	Customer/Stakeholder implications
<p>6-week Open Enrollment from 11/1 – 12/15</p>	<ul style="list-style-type: none"> <li>• \$ System performance: greater load on the system and higher batch volumes from SES implies need to work on performance challenges</li> <li>• \$ Data fixes: reduced time window for resolving customer issues implies need to make system changes to prevent/simplify fixes to data</li> <li>• ↓RTEs / ↑ROPs: implied by greater load on SES/FDSH</li> <li>• Recruiting, staffing, training, and space planning challenges for SC and MA Site</li> <li>• Contractual call center volumetrics and hours of operation determinations</li> </ul>	<ul style="list-style-type: none"> <li>• Potentially high volume of customers missing the enrollment deadline due to unplanned system defects, understaffing in the service center, and telephone outages</li> <li>• Creates more limited capacity for HCG and Broker appointments</li> <li>• Creates limited timeframe for market messaging and communications to stakeholders</li> </ul>

# Potential impacts of CMS proposed rule changes

continued

Item	Technology / Operational implications	Customer / Stakeholder implications
SEP eligibility and pre-enrollment verifications	<ul style="list-style-type: none"> <li>• \$ Verification project: potential need to “pend” enrollments and respond to carrier verification input implies new workflow project</li> <li>• \$ Technology support and/or carrier operational support to support enrollment and LCE changes</li> <li>• Potential staffing implications</li> </ul>	<ul style="list-style-type: none"> <li>• Decision point to follow HHS rules or create state-based solution needed</li> <li>• Determination of roles/responsibilities between C4HCO and Carriers</li> <li>• Potential confusion from Brokers, Assistants, Consumer Advocates around inconsistent processes, documentation, and timelines between Carriers</li> </ul>
SEP restrictions to ensure customers stay within metal tier through LCEs		
Restrictions on marriage SEP		
Non-payment of premium modifies guaranteed availability rules		
Plan Actuarial Value changes	<ul style="list-style-type: none"> <li>• \$ Plan Management modifications</li> </ul>	Harder to differentiate between metal tiers. Carrier retention.

# Potential impacts of a reduced plan submission schedule

Item	Technology / operational implications	Customer / Stakeholder implications
<p>Risk of proposed FFM plan submission schedule being applied to Colorado</p>	<ul style="list-style-type: none"> <li>• Risk: High degree of coordination required across C4, DOI and carriers to ensure conformance to schedule</li> <li>• Risk: Limited opportunities for pre-11/1 production validation</li> <li>• \$ Plan Management modifications to improve efficiency of the QA, data load and operational processes</li> </ul>	<ul style="list-style-type: none"> <li>• Risk that renewal letters will not be processed timely or with accurate plan/carrier/APTC information</li> <li>• Risk of short notice for Carrier exits or limitations in QHPs offered or geographies served, resulting in consumer confusion</li> </ul>

# Potential impacts of proposed state bill “Financial Relief Defray Individual Hlth Plan Cost”

<b>Details</b>	<b>Technology implications</b>	<b>Customer/Stakeholder implications</b>
Exchange to administer program to provide additional financial assistance for customers between 400-500% of FPL	<ul style="list-style-type: none"><li>• \$ Technology Implication. High-level design work in progress. July 1<sup>st</sup> deadline implies disruption to release schedule</li></ul>	<ul style="list-style-type: none"><li>• Could attract more enrollments to the exchange</li><li>• Limited implementation timeframe could imply the need for a partially manual solution</li></ul>

# Cost & budget impact is in progress

- We are currently evaluating the cost impact against what we can achieve within our existing contracts
- Initial planning is in the early stages
- In the short term (within current fiscal year) we do not expect to exceed our procurement limits
- Events may supersede this
- We will report out at the next board meeting