

Arkansas Federally-facilitated Exchange (FFE) Partnership

Monthly Report – May 19- June 22, 2012

General Update

Administrative highlights during this reporting period included:

- Approval was obtained on June 15, 2012 from the Arkansas Legislative Council of our Miscellaneous Federal Grant (MFG) appropriation request, required for spending CCIIO Level One funds during SFY 2012-2013;
- Early discussions with Medicaid, DHS County Operations, ACHI, CCIIO, and subject matter expert consultants continue regarding potential strategies to decrease churning between Medicaid and Exchange populations/plans;
- The Division is preparing three rules for adoption by the Arkansas Insurance Department related to needs for implementation of the FFE-Partnership in Arkansas. Rules topics are Essential Health Benefits, Qualified Health Plans, and Network Adequacy (a regulation on In-Person Assistants--Navigators, Agents and Brokers, and Enrollment Assistants-- is expected in the future). The current goal is to have the rules published by Friday, June 29, to allow for a 30 day comment period followed by a public hearing on the proposed rules on Tuesday, July 31, 2012;
- Statewide community meetings are tentatively scheduled for July 18, 2012. The Commissioner and the AHBEPD Director will present two broadcasts from Little Rock on that date, one in the morning and one in the afternoon. The agenda of each meeting will be the same with each broadcast going to three external locations. A media campaign is under development to notify the public of the seven meeting locations: Little Rock, Monticello, Hope, Forrest City, Batesville, Fayetteville and Fort Smith (or possibly Russellville). The agenda for these meetings will include the status of the Arkansas Federally-Facilitated Exchange Partnership, updates on the Supreme Court ruling, discussion of the three rules pending public comment, and public Q & A;
- A review of the AHBEPD website pages on the Arkansas Insurance Department's website was begun for purposes of planning updates and enhancements. Recommendations are expected to be complete in July and changes coordinated within the Department for implementation;
- Key external communications during the month included presentations to:
 - May 31st - NAIFA Statewide Meeting – Panel on FFE-Partnership (Bradford, Crone)
 - June 5th – MidSouth Summer School on Alcohol and Other Drug Problems – Policy Panel: Health Benefits Exchange Partnership in Arkansas (Cindy Crone)
 - June 14th – National Rate Review Conference in Little Rock – Exchange-Rate Review Collaboration at the State Level (Cindy Crone)
 - June 21st – Health Benefits Exchange Partnership in Arkansas – Downtown Civitan Club (Cindy Crone); and

Interviews with:

- Alison Sider of Arkansas Democrat-Gazette (Commissioner Bradford);
- Urban Institute and Georgetown University (Commissioner Bradford, Cindy Crone) for CCIIO;

- Finalization of official name for the Division as the *Arkansas Health Benefits Exchange Partnership Division* (AHBEPD).

CCIIO/CMS Update

Grantee meeting in Washington, D.C. was attended by Cindy Crone, Sheena Olsen (AR Medicaid), Bruce Donaldson, Zane Chrisman, Will Roark, Carder Hawkins, David Sodergren (First Data), Rich Albertoni (PCG), and Fred Forrer (PCG). Arkansas team members also attended an “office-hours” meeting in follow-up to the May 17-18 Planning Review meeting in Bethesda. Key issues for the “office-hours” meeting were Navigator Grantee process (state vs. federal), Wellness benefits and USPTF Services A & B definitions, pediatric dental benchmark options, and on-going operations funding for AR operated functions of the FFE – Partnership...

In-Person Assisters (IPAs). IPA is the umbrella term CCIIO uses to refer to those individuals that facilitate enrollment into Exchanges: Navigators, Agents and Brokers, and Enrollment Assisters (EA). The Division learned on Wednesday, June 13, 2012 that the FFE Navigator Program grants will be awarded by DHHS, not by the states. However, 1311 grant funds can be used by states to directly contract for or hire Enrollment Assisters (EAs) under the In-Person Assister (IPA) program. Funds for development and first year operations of a state’s EA program can be requested as soon as August 15 under a new Funding Opportunity Announcement (FOA) expected to be announced in July 2012. Arkansas will need to be ready to request funds August 15 in order to have an adequate supply of EAs available by July 2013 in order to meet our enrollment goals.

Essential Health Benefits (EHBs). CCIIO provided the State with federal clarification about pediatric dental plan benchmark alternatives (stand alone plans and Medicaid plans are *not* alternative benchmarks) and that Wellness benefit benchmarks (Preventive Services A & B benefits) must meet the same guidelines as for all benchmarks (e.g., selected EHB benchmark is to be based on selected plan benefits as implemented Jan-March, 2012, unless minimal essential benefit is absent, or the benefits must be paid at 100% state dollar).

The AHBEPD initiated dialogue with Arkansas Department of Health (ADH) about more clearly defining Preventive A & B Services for Arkansas in collaboration with Arkansas Insurance Department (AID). Non-grandfathered plans in Arkansas began offering expanded preventive services toward meeting USPHSTF Preventive A & B Services in 2010. Although this interagency work will not guide initial EHB definitions, it could be used for later Essential Health Benefits (EHB) determinations or even active purchasing considerations for 2014. The Centers for Disease Control has also been involved in these early discussions.

Blueprint Application. The AHBEPD staff is participating in a series of 10 webinars hosted by CCIIO and focusing on the Exchange Blueprint Application that is due from AR no later than November 16, 2012 in order for our state to obtain approval for implementation of Arkansas-operated components of the FFE Partnership Model. Arkansas is planning to submit our Blueprint in September 2012 in order to qualify for federal review and technical assistance prior to the deadline.

CCIIO has advised the AHBEPD to prepare for our first Design Review (Plan Management), a step on the way to FFE Partnership approval. Guidance for Design Review requirements is expected by the first

week of July. Successful completion of this Design Review will also serve to simplify the Exchange Blueprint Application in those areas that requirements are deemed to be the same or similar as advised by CCIIO.

CCIIO-Arkansas Leadership Meetings. On Wednesday, June 20, the first of recurring weekly meetings was held between AHBEPD staff and our CCIIO Project Officer, Emily Pedneau. This meeting time will be used to facilitate weekly discussions regarding new or pending CCIIO questions. A monthly meeting between State Health Leaders and CCIIO-CMS Leaders is scheduled to begin the last week of June.

Key upcoming events –

- CCIIO Arkansas Marketplace Report, July 12, 2012, Arkansas Insurance Department
- Issuance of new CCIIO Exchange FOA
- Issuance of Guidance for Design Review
- Revised Blueprint Document for FFE-Partnership Model
- Various CMS and CCIIO Technical Assistance Webinars on Exchange Development

Steering Committee/Advisory Committee Updates

Steering Committee membership. New appointments by Commissioner Bradford to the Arkansas FFE-Partnership Steering Committee are Edward Anderson of Johnson Regional Medical Center, Jim Couch of QualChoice of Arkansas, and Herb Sanderson of AARP-Arkansas.

May Steering Committee Recommendations. The Commissioner accepted both May 2012 recommendations of the Steering Committee as initially recommended by the Consumer Assistance Advisory Committee: Defining Navigators and Navigator Eligibility.

During May, the Steering Committee recommended that the Commissioner select one of the three largest small group plans by enrollment as Arkansas's benchmark plan. Research related to this selection continues with data being obtained from CCIIO, two actuaries regarding projections of State costs if a benchmark plan without IVF coverage is selected, and from consideration of the overall projected consumer premium impact if the plan with IVF is selected.

June Advisory Committee Recommendations. Both Advisory Committees completed their reviews of scheduled June topics. The Consumer Assistance Advisory Committee completed their Steering Committee recommendations regarding Navigator Certification/Recertification/Decertification and forwarded for June 28th Steering Committee discussion. The Plan Management Advisory Committee held two meetings in June related to the two month topic area of Active Purchaser vs. Open Market (including role of quality standards). Recommendations for this topic area will not be made until following the July Plan Management meetings.

The Consumer Assistance Advisory Committee formed a subcommittee initially tasked with in-depth community assessments to assist with recruitment of Navigator entities and individual Navigators across Arkansas. This Subcommittee has met twice and will likely expand its scope to quickly consider the broader Enrollment Assister Program for Arkansas. Based on the new Navigator Grant information from

CCIIO and additional clarification expected from CCIIO the week of June 25th regarding the new Enrollment Assister state option, there will likely be a change in the topic area from Navigator Grant requirements to IPA Training for the Consumer Assistance Advisory Committee consideration during the month of July.

Stakeholder Engagement Model Update. AHBEPD finalized Version 2 (V2) of the Stakeholder Engagement Model document to include Section 2 - Arkansas FFE Partnership Stakeholder Engagement Model Updates. The additions are Section 2.1 – Meeting Schedules and Attendance and Section 2.2 - Recommendation Tracking Documentation Process Flow. Section 2.1 includes guidance regarding the use of a proxy when a member is unable to attend. Section 2.2 provides a process flow to track the monthly topic area through the cycle of review, recommendation and acceptance from the staff/consultants to the Advisory Committee to the Steering Committee to the Commissioner and back to all committee members with the final results of Commissioner decision-making.

Key upcoming events –

- Steering Committee meeting (6/28)
- Consumer Assistance Advisory Committee meeting (July 13 – likely IPA Training) and Subcommittee meetings (June 29th, July 7)
- Plan Management Advisory Committee meetings (July 6, July 13 – Active Purchaser vs. Open Market continued from June)

Procurement Update

The AHBEPD published a Request for Information on Friday, June 8, 2012 to receive information from interested parties on providing the anticipated IT solution services for supporting the Navigator program in Arkansas. The deadline for responses was Friday, June 22, 2012 at 2:00 pm. A total five responses were received for evaluation. During the response period, updates were received from CCIIO that the “Navigator” program grants will be administered by DHHS and that states may apply for 1311 grant funds for the operation of a state administered “Enrollment Assister” program. Details received thus far indicate the scope of services requested in our “Navigator” RFI will closely align with the objectives for the state administered “Enrollment Assister” program. The next steps regarding the use of the RFI response information will be determined upon receipt of CCIIO’s guidance for the state administered EA program.

Key upcoming events –

- Evaluation of Navigator RFI responses;
- Determination of alignment (or not) between Navigator and broader IPA IT needs;
- Defining next steps in In-Person Assister (IPA) IT Program vendor selection.

Exchange Staff Update

The AHBEPD filled the remaining staff position when Tangelia Clary-Marshall accepted the Administrative Analyst position in mid-June.

The Exchange Planning team has completed a necessary inter-agency agreement with ACHI for Quality Assessment Consultation (Level One funds).

The AHBEPD Bi-weekly Status Meetings were held on June 7th and June 21st and attended by the AHBEPD staff, contracted vendors, and other resources engaged through intra-agency and interagency agreements. Meetings are used to discuss overall project status across all project components and for monitoring of project activities against the project work plan. Project risks and issues are reviewed during these meetings for pending resolutions or ongoing monitoring as appropriate.

We completed scheduling of a monthly progress/consultation meeting to be attended by State and Federal leadership. The first meeting is scheduled for June 26 (Tuesday).

Key upcoming events –

- Installation of new phone system for the Division on June 29th;
- In-service training for staff on the use of the federal repository tools CALT and SERVIS.

Key Risks/Issues

Below is a summary of submitted/open risks for the report period.

Risk	Category	Response Strategy	Status
The Federal Funding model coupled with the State of Arkansas spending authorization model creates the need for multiple spending approval cycles plus introduces the possibility of available federal funds without the authority to spend.	Organizational	Evaluate impact of CCIIO review process on the release of IT funds from CCIIO Develop subsequent Grant requests well in advance of the end of current grant monies allocation	Open
The guidance for the In Person Assistance (IPA) program will not be received from CMS in a timely fashion, impacting the ability of Arkansas to develop an accurate and viable business model prior to the grant request deadlines.	Organizational	Escalate the priorities for obtaining state information needed for IPA design to allow for as much time as possible to focus on aligning with required aspects once guidance is received. Regular/frequent communications with CCIIO State Representative	Open

Key Meetings/Milestones Completed

Meeting/Milestone	Type	Date
CCIIO Exchange Grantee Conference	CCIIO/CMS Conference	05/21/2012- 05/23/2012
May Steering Committee Meeting	Steering Committee	05/24/2012
June Plan Management Advisory Committee Meetings – Open Market vs. Active Purchaser & Quality Measures; Basic Health Plan and f/u on EHBs and Open Market vs. Active Purchaser Model	Advisory Committee	06/08/2012 06/19/2012
June Consumer Assistance Advisory Committee Meeting – Navigator Certification	Advisory Committee	06/08/2012
June Consumer Assistance Advisory Committee Subcommittee on Community Assessment	Advisory Committee - Subcommittee	06/07/2012 06/21/2012

Key Meetings/Milestones Upcoming

Meeting/Milestone	Type	Date
Monthly progress/consultation meeting	State and Federal Leadership	06/26/2012
Publication of Proposed Rules	General Public	06/29/2012
Plan Management Advisory Committee	Advisory Committee	07/06/2012 07/13/2012
Consumer Assistance Advisory Committee and Consumer Assistance Advisory Brainstorm Session	Advisory Committee	07/13/2012 06/29/2012 and TBA
CCIIO Marketplace Demonstration	State and Federal Leadership	07/12/2012
Community Meetings	General Public	07/18/2012
Public Hearing of Proposed Rules	General Public	07/31/2012