USE

**Colorado Health Benefit Exchange (COHBE)**



**PM - 001 Certify Carrier**

**Use Case**

**Version 1.0**

**October 23, 2012**



REVISION HISTORY

|  |  |  |  |
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# Use Case: Certify Carrier

## Goal

The goal of the Certify Carrier Use Case is to have Carriers reviewed by COHBE for certification in the Exchange.

This Use Case completes successfully when COHBE has reviewed the Carrier for certification in the Exchange.

## Brief Description

The Colorado Health Benefits Exchange agency and the Division of Insurance (DOI) will work closely together as Carriers are considered for participation inside and outside the Exchange. COHBE will send an email to the Carrier inviting them to submit certification data by a specific date. Carriers will use the login and password provided in the email to log into the Carrier Portal and enter their certification information which will be used to certify the Carrier.

COHBE staff will manually review the certification items and approve, reject, or fatally reject them, with notes made in the workflow. If all items are approved, the workflow checklist will be updated, the database status for the record that houses the certification information will be updated to approved and the Carrier will receive an approved notification.

## Requirements Traceability

The following requirements are covered within this Use Case:

* PM015: The System will provide workflows for the certification of carriers to participate in the Exchange.
* PM200: The Exchange shall allow Carriers to appeal carrier and plan certification status.  This can be manual (backoffice) process.
* PM150: The System shall be configured to support the plan management business processes identified in CMS Plan Management Blueprint; Exchange Business Architecture Supplement
  + Blueprint Item 4.3: The Exchange uses a plan management system(s) or processes that support the collection of QHP issuer and plan data; facilitate the QHP certification process; manage QHP issuers and plans; and integrate with other Exchange business areas, including the Exchange Internet Web site, call center, quality, eligibility and enrollment, and premium processing

## Primary Actor

### COHBE

The Colorado Health Benefit Exchange (COHBE) staff will be responsible for reviewing the information on the Carrier and certifying them to participate in the Exchange. They will initiate the process by asking the Carrier to submit certification details.

## Secondary Actor

### Insurance Carrier

After establishing an account on the Exchange, the Carrier can log into the Carrier Portal to submit the Carrier Certification data. The Carrier may also be referred to as an Issuer.

### Carrier Portal/Exchange

The Carrier Portal in the Exchange is the primary source of all Plan Management activities. The Exchange will receive the data from the Carrier and will start the workflow process for certifying Carriers.

## Pre-Conditions

The Use Case of Create Carrier Account must be executed prior to the Carrier logging into the Carrier Portal to submit certification details.

The Colorado Health Benefits Exchange will set a deadline date for Carriers to have their certifications complete each year. It may change from year to year. It is likely to be in the spring or summer of each year.

## Successful Post-Conditions

The Carrier is certified in the Exchange and ready to submit QHP’s.

## Triggers

Based on communications from COHBE, the Back Office will send an email to the Carrier to set up an account on the Carrier Portal (Create Carrier Account Use Case) if one does not exist and to submit certification data.

## Assumptions

It is assumed that all Carriers will be invited to submit certification data after January 2, 2013 and that they will be required to submit data by a specific date (i.e., March 31, 2013) if they wish to be considered for inclusion in the 2014 plan year.

Certification needs to be complete before plan data are submitted for consideration. If SERFF sends data to the Exchange before the Carrier Certification is complete, no action will be taken on the plan data until the Carrier Certification process is complete.

COHBE’s goal is to have all Carriers Certification reviews completed no later than a specific date (i.e., April 30, 2013).

COHBE will not have the capability to alter certification information submitted by the Carrier.

# Flow of Events

The Business Process Activity diagram below, shows the COHBE processes for the Certify Carrier Use Case. The steps numbered on the diagram below have detailed explanations in the sections that follow.



## Basic (Main) Flow – Certify Carrier

The basic flow for this Use Case starts with COHBE informing the Carrier to submit certification data. Once data is received by COHBE, the certification process begins to approve all the certification items prior to the certification deadline. After all items have been approved, the workflow checklist is updated, saved to the database and the Carrier is notified that their certification has been approved.

### Send Email to Start Carrier Certification

An email is sent by COHBE to invite the Carrier to submit certification data. Proceed to Step 2.1.2, Receive Email.

### Receive Email

The Carrier receives the email inviting them to participate with login and password credentials to access the Carrier Portal to enter the Carrier Certification information. After logging into the Carrier Portal, proceed to Step 2.1.3, Enter Certification Data on the Carrier Portal.

### Enter Certification Data on the Carrier Portal

The Carrier enters data on certification items and submits once they have completed the online form in the Carrier Portal. Carriers may upload documentation over time (days or sessions). Only after all items needed for certification are uploaded will the Carrier hit the Submit button. After successful submission, proceed to Step 2.1.4, Create/Update Carrier Certification Data. See Section 5.1.1 for Business Rules related to the data items.

### Create/Update Carrier Certification Record

The certification data is stored in the Carrier Portal database. The clock for the COHBE reviewer to finish (not just start) reviewing the Carrier Certification will begin at this point. Proceed to Step 2.1.5, Send Notification to Review Carrier Certification.

### Create Carrier Review Worklist

The COHBE reviewer(s) receives a notification that the certification information needs to be reviewed. Proceed to Step 2.1.6, Does Certification Need to be Escalated?.

### Is Escalation Needed?

If the COHBE reviewer begins the certification process before an escalation is needed, proceed to Step 2.1.7, Review Each Carrier Certification Item. If a COHBE reviewer does not begin the certification process (Process Rule, 5.2.1), a manager will be notified that work has not begun for the certification process (Alternate Flow 3.1).

### Review All Carrier Certification Items

The COHBE reviewer(s) will review each item submitted by the Carrier. After reviewing workflow items, reviewers can accept or reject each item independently. If any item is rejected, the flow goes into the Alternate Flow at Step 3.2.1.

### Are Any Items Rejected?

After Step 2.1.7 is complete, a check will be done for any item that is rejected (Alternate Flow, Step 3.2). If no items are rejected, proceed to Step 2.1.9, Approve All Workflow Checklist Items.

### Approve All Workflow Checklist Items

After the review process is complete and all items on the checklist are approved, the workflow form will be updated to “approved” for all items. Proceed to Step 2.1.10, Approve Carrier Certification Record.

### Approve Carrier Certification Record

The record created in Step 2.1.4 will be updated to “approved” as part of the Carrier Certification. Proceed to Step 2.1.11, Notify Carrier of Certification Acceptance.

### Notify Carrier of Certification Acceptance

After all certification items have been approved, a formal notification will be sent to the Carrier which will document the date and time the notification was sent. Proceed to Step 2.1.12, Receive Carrier Certification Acceptance.

### Receive Carrier Certification Acceptance

The Carrier receives a formal notice with information regarding the certification approval.

### Next Steps

The user can proceed to next steps such as:

* Certifying Plans in the Exchange
* Go through the appeals process for rejected Carrier Certifications

# Alternate Flows

## Escalation

The Alternate Flow is entered when workflow items are ready to be worked on, but one or more reviewer has not reviewed the assigned work list items before escalation is needed. Each section entered by the Carrier may require a different reviewer.

### Manager Handles Escalation

If a reviewer for the Carrier Certification does not begin the review process before the escalation is needed, a supervisor will be notified as part of the escalation process. Actions by the escalation manager will allow the review process (See Basic Flow, Step 2.1.7) to begin. This escalation may also apply if the work is started before the escalation period, but the work has not been finished by the finish deadline.

## Not All Certification Items Are Accepted

The Alternate Flow is entered when some or all certification items are rejected. The rejections may allow for re-work by the Carrier (non-fatal). Other items may be rejected and cannot be fixed by the Carrier. These are fatal rejections (which need to be noticed by certified mail). If the Rejection is fatal, proceed to Alternate Flow Step 3.3.1, Notify Carrier of Rejection by Certified Mail. If the rejection is non-fatal, proceed to Alternate Flow Step 3.2.2, Update Workflow Checklist for Rejected Items.

### Is Rejection Fatal?

The system will check to see if the rejection is fatal or non-fatal. If the Rejection is fatal, proceed to Alternate Flow Step 3.3.1, Notify Carrier of Rejection. If the rejection is non-fatal, proceed to Alternate Flow Step 3.2.2 Update Workflow Checklist for Rejected Items.

### Update Workflow Checklist for Rejected Items

When items that have been rejected can be resubmitted, the workflow checklist item will be updated as rejected and the system will proceed to Step 3.2.3, Update Carrier Certification Record.

### Update Carrier Certification Record

The Carrier certification record will be updated with a status of rejected for each section (item) that has been rejected. One or more sections may be rejected and each section that is rejected will have the status updated to “rejected” in the database. It is possible to have both “accepted” and “rejected” items on the same carrier record. After the status is updated, proceed to Step 3.2.4, Email to Carrier with Rejection and Request Updates.

### Email to Carrier with Rejection and Request Updates

The reviewer will use the system to send an email to the Carrier with the section(s) that was rejected and need to be updated. In the email, the reviewer will note the due date for the response for each item rejected. Proceed to Step 3.2.5, Receive Notice to Modify.

### Receive Notice to Modify

Carrier will receive the email to make updates to the specific sections/items that were rejected. A timer begins to track the response time from the Carrier based on the due date set in the previous Step (3.2.4, Email to Carrier). The work will be done by the Carrier where they originally entered the certification data on the Carrier Portal (See Basic Flow, Step 2.1.3) after the system evaluates if the deadline has passed.

### Has Deadline Passed?

If the date has passed for all certification work to be completed, or if the reviewer set due date has passed, the system will go on to the Full Rejection Alternate Flow (Section 3.3.1). If the deadline has not passed, the Carrier is allowed to do the updates in the Carrier Portal by resuming the basic flow at Step 2.1.3, Enter Certification Data on the Carrier Portal.

## Deadline Passed/Fatal Rejection

The Alternate Flow is entered when the deadline for a Carrier to be certified has passed or the rejection is fatal.

### Notify Carrier of Rejection by Certified Mail

A Carrier will be formally notified of a fatal rejection (Alternate Flow, Step 3.2). This Step is a “fatal” rejection to distinguish it from only one section or item being rejected. In this case, either all items are rejected, or a section is so flawed it cannot be fixed, or the calendar date deadline has passed. In each case, the rejection is of the full certification request.

### Is there an Appeal?

Rejected Carriers can decide whether to appeal a Carrier rejection by COHBE. The Carrier will make a decision to appeal a rejection or accept the COHBE decision to reject the certification application (see Alternate Flow, Step 3.3.3 or see Exception Flow, Step 4.1).

### Appeals Process

If the Carrier decides to appeal the COHBE decision, they will have the option to appeal the decision to reject the certification application. The CGI back office will perform appeals after COHBE case worker has reviewed the appeal from a carrier. The appeals process will be defined in the appeals use case.

# Exception Flows

## Carrier Withdraws Certification

At any point in the certification process, prior to the Carrier approval, the Carrier may withdraw the application for Carrier Certification. This may be through an active notification to COHBE (telephone, email, or mail communication) or passive (failure to respond). Either will result in the workflow being terminated.

# Specifications

## Business Rules

### Carrier Basic Information Screen Rules

The Carrier Portal Screen for basic information will contain the following fields:

| Field | Required/Optional/Conditional/Rules |
| --- | --- |
| Legal Name of Carrier | Required, Letters, numbers, special characters, and embedded spaces |
| Name to Display in Exchange | Required, default to Legal Name, allow to be changed, Letters, numbers, special characters, embedded spaces |
| Approver Contact First Name | Required, changeable |
| Approver Contact Middle Name/Initial | Optional, changeable |
| Approver Contact Last Name | Required, changeable |
| Approver Contact Email | Required, name@domain.extension |
| Approver Contact Backup Email | Optional, name@domain.extension |
| Approver Contact Address 1 | Required, Letters, numbers, special characters, embedded spaces |
| Approver Contact Address 2 | Optional, Letters, numbers, special characters, embedded spaces |
| Approver Contact City | Required, Letters, no numbers or special characters |
| Approver Contact State | Required, Valid State Code |
| Approver Contact Zip | Required, Numbers |
| Approver Contact Main Phone | Required, 999-999-9999 |
| Approver Contact Second Phone | Optional, 999-999-9999 |
| Marketing Contact First Name | Required, changeable |
| Marketing Contact Middle Name/Initial | Optional, changeable |
| Marketing Contact Last Name | Required, changeable |
| Marketing Contact Email | Required, name@domain.extension |
| Marketing Contact Backup Email | Optional, name@domain.extension |
| Marketing Contact Address 1 | Required, Letters, numbers, special characters, embedded spaces |
| Marketing Contact Address 2 | Optional, Letters, numbers, special characters, embedded spaces |
| Marketing Contact City | Required, Letters, no numbers or special characters |
| Marketing Contact State | Required, Valid State Code |
| Marketing Contact Zip | Required, Numbers |
| Marketing Contact Main Phone | Required, 999-999-9999 |
| Marketing Contact Second Phone | Optional, 999-999-9999 |
| Rating Contact First Name | Required, changeable |
| Rating Contact Middle Name/Initial | Optional, changeable |
| Rating Contact Last Name | Required, changeable |
| Rating Contact Email | Required, name@domain.extension |
| Rating Contact Backup Email | Optional, name@domain.extension |
| Rating Contact Address 1 | Required, Letters, numbers, special characters, embedded spaces |
| Rating Contact Address 2 | Optional, Letters, numbers, special characters, embedded spaces |
| Rating Contact City | Required, Letters, no numbers or special characters |
| Rating Contact State | Required, Valid State Code |
| Rating Contact Zip | Required, Numbers |
| Rating Contact Main Phone | Required, 999-999-9999 |
| Rating Contact Second Phone | Optional, 999-999-9999 |
| National Association of Insurance Carriers (NAIC) Number | Format of 99999 |
| “I certify the information is true and correct” Checkbox | Required when clicking the Submit Button |
| Terms and Conditions checkbox  T & C may include the following:  Agree that COHBE may inquire about the carrier from other agencies  Agree to comply with COHBE Marketing Requirements  Agree to comply with the False Claims Act  Agree to…. (details to be determined with detail design work) | Required when clicking the Submit Button |
| For COHBE Use Only:  Reviewer Name | Conditional |
| Review Begin Date | Conditional |
| Review End Date | Conditional |
| Certification Status | Conditional: In Process, Certified, Rejected, Appealed, Denied, Withdrawn |

Information on this page can be saved while in process.

Apply Rules once the Submit Button is clicked.

Note on screen the date of last submission (for checking against calendar year deadline for Carrier Certification).

Other Rules?

### Carrier Certification Upload Menu Screen Rules

The Carrier Portal Screen for uploading the certification documents will contain the following fields:

| Field | Required/Optional/Conditional/Rules |
| --- | --- |
| Accreditation Entity  “NCQA, URAC” checkbox | Required, at least one of the checkboxes must be chosen |
| Accreditation Status  “Accredited, Transition” | Required, at least one of the checkboxes must be chosen |
| CAHPS Rating | Required, two digit field, number between 0 and 99 |
| Quality Ratings  “CAHPS Summary”  “HEDIS Summary” | At least one file is required, upload of multiple PDF files allowed (no need to verify that it is a PDF as opposed to .jpg or .doc etc.) |
| Complaint Data  Single field with percent sign | Required, two digit field, number between 0 and 99 |
| Transparency Disclosure  “Disclosures for Claims Payment and Out of Network Policy” | At least one file is required, upload of multiple PDF files allowed (no need to verify that it is a PDF as opposed to .jpg or .doc etc.) |
| Licensure and Solvency:  “The Carrier is properly licensed and is solvent” | Required, checkbox must be chosen |
| Medical Loss Ratio:  Single field with percent sign | Required, two digit field, number between 0 and 99 |
| Marketing Materials | At least one file is required, upload of multiple PDF files allowed (no need to verify that it is a PDF as opposed to .jpg or .doc etc.) |

Information on this page can be saved while in process.

Apply Rules once the Submit Button on the Basic Info page is clicked.

Note on screen the date of last submission (for checking against calendar year deadline for Carrier Certification).

## Process Rules

### Escalation Rules

Two levels of escalations may take place if the reviewer does not begin the certification review:

If Reviewer takes longer than a set number of days, then an email will be sent to the Plan Manager for follow up

The review is expected to be finished within configurable number of calendar days (to be configured each review year).

The first level escalation will happen if the review is not started in a configurable number of days.

If the Plan Manager takes longer than a set number of days to ensure the review begins, an email will be sent to the Chief Operating Officer (COO)

The second level escalation is set if the review has not begun in a configurable number of days.

### Has Deadline Passed?

Workflow will determine if the calendar date deadline for the Carrier to be certified has passed. If the deadline has passed, an email notification will be sent to the Carrier informing them the certification has been rejected.

### Rejected Workflow Items

Rejected workflow items will be routed to another process to determine if the rejected items result in a fatal rejection or if the rejection can be updated by the Carrier.

### Type of Rejection

Fatal rejection will result in an email notification to the Carrier. If rejection can be fixed, the work list item will be updated to rejected and a notification will be sent to the Carrier requesting the Carrier to update a fix to the item.

### Appeal Fatal Rejection

Carriers can decide to go through an appeals process for the fatal rejection after they have been notified by certified mail. Appeals will be logged in the workflow, but the workflow will not have a process for the appeals.

## Workflow

### Worklist Definitions

#### Certify Carrier Worklist

Task Name: COHBE Staff Review Carrier Certification

Worklist Name: Carrier Certification Checklist

Task Type: COHBE Staff Normal Checklist

Sort Criteria: First In, First Out

SLA Watch: User Configurable

SLA Warning: User Configurable

Escalation:

If Reviewer takes longer than a set number of days, The Reviewer Escalation Worklist is started.

Escalation Worklist: Reviewer Follow Up an email will be sent to the Reviewer’s supervisor for follow up

Escalation Worklist: Carrier Follow Up an email will be sent to the COHBE reviewer for follow up

Task Actions: Note: This is a set of manual reviews and multiple people may be reviewing the items. The system will need to be able to record the results of the review on the screen.

Basic Carrier information – Systematic Check instead of back office

Is the information complete?

Accept? Reject? Fatally Reject?

Reason for Rejection

Accreditation Status -

Look up Accreditation Status

If not found, email the accreditation entity for confirmation?

Accept? Reject? Fatally Reject?

Reason for Rejection

Complaint Data

Enter data one DOI releases complaint ratio

Accept? Reject? Fatally Reject?

Reason for Rejection

Transparency Disclosures

Claims Payment and Financial Disclosure

Out of Network Policy Disclosure

Are the disclosures complete and in plain language?

Accept? Reject? Fatally Reject?

Reason for Rejection

Licensure and Solvency

Look up the NAIC number to confirm licensure and solvency.

Accept? Reject? Fatally Reject?

Reason for Rejection

Medical Loss Ratio (MLR) statistics

Verify MLR via web look up

Accept? Reject? Fatally Reject?

Reason for Rejection

Quality Ratings

Verify CAHPS data with NCQA

Verify HEDIS data with NCQA

Accept? Reject? Fatally Reject?

Reason for Rejection

Marketing Materials

Review Marketing Materials for compliance and clarity

Accept? Reject? Fatally Reject?

Reason for Rejection

Log each review decision on Workflow

Update Carrier Status

## UI Screen Details

### Carrier Certification Landing Page

Carrier Portal will need UI screens to be developed.

Fields to be created for the Carrier Certification Basic Information Screen can be found in Section 5.1.1. Fields for the Carrier Certification Menu Screen can be found in Section 5.1.2.

### Carrier Certification Workflow Checklist Page(s)

What fields are needed to note the decision made about the certification items for a Carrier?

It is assumed that, at a minimum, the Certification Item with an Accept, Reject, and Fatally Reject box to check (or radio button) as well as a text box for the reason for rejection or fatal rejection will be on the page.

## Communications

### Imaging Requirements

Uploaded documents will be part of imaging requirements. See Section 5.1.2 Process Rules for items to be uploaded.

### Form Requirements

There are no form requirements for the Certify Carrier Use Case.

### Notices Requirements

Email notices are sent electronically by the System.

Certified Mail will be required for fatal rejections.

### Other Communication Requirements

There are no Other Communication needs for the Certify Carrier Use Case.

## Interfaces

### Interfaces

There are no Interfaces for the Certify Carrier Use Case.

## Reporting

### Carrier Certification Reporting

There are special reporting needs for the Certify Carrier Use Case

Number of carriers contacted?

Number of carriers that set-up accounts and when (time element)?

Number of carriers that were certified and when?

Number of carriers that were not certified and the reason Category (status code)?

Number of carriers on system

Number of carriers in process (by stage/acct. manager)

Average time to certify

Number of carriers that started application and didn’t complete

Time through process

Number of appeals (results)

Person completing steps

Time to complete steps

Response time to issues

Process reports, who has what tasks on hand, where are carriers “stuck”?

## User Security

### COHBE Security Requirements

Are there special security needs for the Certify Carrier Use Case?

Assumptions:

We will have multiple types and levels of carrier entities

We will have multiple levels of security privileges

The mapping of the above two will define security roles

Every carrier will have at least 1 “Administrator” with senior security privileges:

This person and role must be authorized by COHBE

This role thereafter may authorize additional accounts (persons and roles) within that carrier, who must have subordinate security privileges

COHBE -Plan Reviewer (3)

COHBE Plan Manager (singleton) (2)

COHBE COO (Chief Operating Officer) (singleton) (1)

COHBE Cannot modify carrier or plan data

COHBE Cannot modify carrier or plan metadata

Possible Security Scenarios:

Carriers can enter and modify data on the Carrier Portal Carrier Certification screens. They cannot delete information.

Reviewers cannot modify data on the Carrier Certification screens. They can enter and modify data on the workflow tools screens.

Supervisors can add, change, or delete data on the Carrier Certification screens with confirming prompts (You are about to Add Data. Are you sure?).

Administrator of Carriers

Account is created as Legal Entity

Funcitonal roles can be defined later

Security privilege hierarchy

## Activity Log and Audit Trail

### Activity Log

Workflow updates must include the user who made the update and a date/time stamp for approvals and rejections.

### Audit Trail Log

On the Workflow Checklist pages, each time a field is modified, an audit trail is needed to note when the change was made and by whom.

# Future Release Notes

* Recertification will be addressed as a future release if needed, including a notation of the Plan Year being certified.
* A potential release is the automation of the manual processes described here.
* In the future, the quality data for the Carrier may need to be more structured. This may involve more fields, or fields with drill-down capability.

# Appendix A - Glossary

| Term | Definition |
| --- | --- |
| Approval | “Approval“ is a determination by a statutory authority that a proposed action (such as a sale) or object (such as an insurance plan) complies with legal requirements and may proceed or be used. |
| Back Office | In this use case, Back Office indicates either the COHBE staff or CGI Back Office staff. Until there is more federal guidance about how structured the data submissions will be for certification items, it is unclear which group will need to take responsibility. Until known, assume the Back Office staff means a COHBE person assigned for reviewing Carriers. |
| Carrier | The insurance company that is offering to do business in the Exchange. Colorado Revised Statutes at Title 10 define Carrier further. |
| Certification | “Certification” is a determination by COHBE or other government-authorized entity that an action or object complies with policy and may proceed or be used. In this context, the carrier or plan is certified for use in the Exchange. |
| COHBE | Colorado Health Benefit Exchange |
| DBA | Doing Business As, the name a business is known by |
| DOI | Division of Insurance within the Colorado Department of Regulatory Agencies |
| DORA | Department of Regulatory Agencies |
| Issuer | The federal term for the insurance company that is offering to do business in the Exchange. The term is used throughout PPACA and regulation. 45 CFR 144.103: Health insurance issuer or issuer means an insurance company, insurance service, or insurance organization (including an HMO) that is required to be licensed to engage in the business of insurance in a State and that is subject to State law that regulates insurance (within the meaning of section 514(b)(2) of ERISA). This term does not include a group health plan. |
| SERFF | System for Electronic Rates and Form Filing (SERFF) |