

## **NY State of Health Exchange Modernization Grant:**

### ***Project Narrative***

The NY State of Health Marketplace is pleased to submit this request for a Cooperative Agreement to support State Exchange Modernization. New York successfully launched its Marketplace (Exchange) on October 1, 2013, and as of July 2021, more than 6 million New Yorkers are enrolled in health insurance through the NY State of Health (NYSOH). During the COVID-19 public health emergency, NYSOH has served as a critical safety net where individuals who lost jobs and /or income can find and enroll in affordable, comprehensive health insurance.

Funding is requested to support Information Technology (IT) system development needs and consumer education that have resulted from new federal requirements under the American Rescue Plan Act of 2021 (ARPA). The goals of this project are to enable eligible New Yorkers to access ARPA's enhanced federal premium tax credits as seamlessly as possible, to ensure that eligible individuals are aware of the availability of these tax credits and how to enroll in coverage, and ultimately to increase enrollment levels among traditionally uninsured populations.

#### **I. Exchange Modernization**

NYSOH seeks funding for design, development and implementation activities required to deliver consumer relief measures related to the health insurance provisions of the ARPA as quickly as possible, and as changes are required to various aspects of New York's marketplace operations. Specifically, ARPA improves and expands premium assistance for current and new Qualified Health Plan (QHP) consumers, including to higher income individuals earning greater than 400 percent of the Federal Poverty Level (FPL) for the first time and provides increased

financial assistance to individuals who were approved to receive or received unemployment insurance benefits (UIB) in 2021 (ARPA Sections 2305, 9661 and 9663).

In accordance with the notice of funding opportunity for this cooperative agreement, NYSOH seeks reimbursement for a share of activities already completed (pre-award), as well as funding for activities yet to be executed (project period). Within those timeframes of distinction, NYSOH classifies activities according to two main categories, ARPA IT System Work and ARPA Consumer Education.

#### **A. Pre-Award Activities**

The pre-award time period is defined as March 15, 2021 through July 20, 2021, the anticipated submission date of this grant application. During this period, New York completed necessary IT system work to enable eligible New Yorkers access to enhanced tax credits as soon as possible under the law.

##### Pre-Award IT System Work

The first phase of IT system work, completed in early April 2021, required NY State of Health to connect to the updated Federal Data Services Hub Advance Computation Service in order to provide enhanced Advance Premium Tax Credits (APTC) to consumers currently eligible for APTC with incomes at or below 400 percent of FPL. NYSOH produced and disseminated updated eligibility notices informing consumers of their new APTC eligibility amounts. Subsequently, in May 2021, NY State of Health automatically applied the higher tax credits for eligible enrollees without requiring action on the part of the enrollee. NYSOH produced and disseminated updated consumer enrollment notices indicating the amount of APTC being applied toward lowering their monthly premiums, and instructed them to log into their NYSOH account or call the Customer Service Center with questions or to make changes.

During the pre-award period, NYSOH conducted outreach through direct email and through enrollment assistors, who contacted consumers who were eligible for enhanced APTC but not yet enrolled in a plan, to apprise them of the additional financial assistance available through NYSOH under ARPA and to assist them with claiming these credits and completing their enrollment.

The next phase of IT system work, completed in June 2021, entailed making changes to existing APTC eligibility rules to allow new and existing applicants with incomes above 400 percent of FPL be determined eligible for APTC if the premium of Second Lowest Cost Silver Plan in their county exceeds 8.5 percent of their income for plan years 2021 and 2022. As part of this process, NYSOH identified and redetermined eligibility for existing applicants who applied for financial assistance but were previously over income, and sent updated eligibility notices and emails to consumers who were newly APTC eligible informing them of new financial assistance available to them. NYSOH also emailed consumers with non-financial assistance applications, encouraging them to come back and update their applications to see if they may qualify for financial assistance.

In each phase of implementation, NYSOH's online shopping tool, the "Anonymous Plan Search and Premium Estimator," which is geared to consumers who have not yet started an application, was updated to reflect enhanced financial assistance available to consumers.

The final major phase of pre-award IT System Work addressed the provision of the ARPA that provides the maximum amount of APTC and Cost-Sharing Reductions (CSR) to individuals who received or were approved to receive UIB in 2021. NYSOH built a system utility that identifies consumers who have either attested to receiving UIB or for whom NYSOH's interface with the NY State Department of Labor data source indicates via web

service that the consumer is in receipt of UIB in 2021, and determines them eligible for the maximum available amount of APTC and CSR. NYSOH produced and disseminated updated consumer eligibility notices with their enhanced APTC amount and CSR levels, and also sent consumers emails informing them that to receive the cost sharing reductions, they need to enroll in a Silver level plan.

The milestones for the pre-award IT system work are: connecting to the new Federal Max APC Service; updating system eligibility rules for populations with incomes above 400% of FPL; building utilities to redetermine eligibility for members eligible for the ARPA benefits under sections 2305, 9663, and 9661; updating the anonymous plan search tool; and updating eligibility and enrollment notices. The measurable objective is the number of New Yorkers benefiting from the enhanced APTC through ARPA. As of July 15, 140,529 QHP enrollees are receiving enhanced APTC.

#### **B. Project Period IT System Work**

In addition to activities already completed, NYSOH seeks funding for ongoing IT System Work related to the ARPA. In Fall 2021 (September – November), NYSOH will need to implement changes to annual renewal eligibility determination processes to ensure that consumers receive the correct APTC amounts and renewal notices under the ARPA. NYSOH will redetermine eligibility for all currently enrolled consumers, including those in receipt of the enhanced financial assistance made available by the ARPA. Grant funding would support the IT system work pertaining to the updated redetermination process, as well as necessary updates to consumer notices due to ARPA.

The milestones for the project period IT system work will be redetermining eligibility for members with enhanced tax credits, and sending updated enrollment notices based on ARPA

changes. The measurable objective of the project period IT system work is that the enrollees redetermined eligible for APTC in 2022 will receive enhanced APTC amounts.

### **C. Pre-Award and Project Period Consumer Education**

NYSOH has engaged in a variety of education and outreach activities to increase consumer awareness of the enhanced financial assistance available under ARPA. These activities began in March 2021 and will continue throughout 2021 and 2022. Grant funds for consumer education are requested for the project period only; state special revenue funds will cover the cost of pre-award consumer education activities and the balance of costs of consumer education activities completed during the project period.

#### Consumer Materials

NYSOH developed a variety of consumer materials focused on the ARPA, including an informational page on its website with key information about how New Yorkers could benefit from the ARPA health insurance related provisions. In addition, NYSOH has developed consumer fact sheets, rack cards, posters, and inserts to share with consumers at outreach events and with numerous partner organizations across the state.

The milestone for consumer education is the development of consumer education materials. The measurable objective for consumer materials is the number of materials printed.

#### Translation

In compliance with federal requirements, NYSOH translates all consumer materials into New York's most commonly spoken languages. NYSOH processes all translation jobs through our contracted vendor, Language Line Solutions. Translation has been completed for all ARPA-related print publications, website text, presentations, social media posts, partner letters, consumer emails, and banner ads. Materials are translated into up to 26 languages; NYSOH's

website is translated into Spanish and Chinese; consumer emails and social media posts are translated into Spanish; and its advertising is produced in English, Spanish, Mandarin and Haitian Creole. We expect to continue translating ARPA-specific social media posts, consumer emails, and other text, as needed, throughout 2021 and 2022.

The milestone for translation is the submission of materials for translation. The measurable objective for translations is the number of resources translated.

### Advertising

NYSOH requests funding to cover a share of the costs of its paid advertising campaign to promote the ARPA benefits among potentially eligible New Yorkers. NYSOH launched an advertising campaign to increase public awareness of the enhanced federal premium tax credits available to lower the cost of QHP coverage, enrollment deadlines, how to enroll, and ultimately to drive increased enrollment in Marketplace plans. NYSOH's ARPA advertising campaign includes digital, television, radio, and print channels for the period of September 10, 2021 to January 31, 2022. Advertising would be targeted to demographic groups and geographic areas across New York State to reach individuals who are eligible for QHP coverage and premium tax credits. Ads would run in English, Spanish, Mandarin and Haitian Creole and would be heaviest during the Open Enrollment Period from November 1, 2021 to January 31, 2022.

The milestone for advertising was the development of advertisement materials. The measurable objectives are: number of digital ads produced and place, number of television, radio, and print advertising spots/runs.

## **II. Organizational Capacity**

NYSOH is housed within the New York State Department of Health. Its organizational structure includes Executive Leadership, and the following functional areas: Administration;

Counsel; Policy and Evaluation; Plan Management; Communications, Outreach and Marketing; and the Small Business Marketplace. NYSOH is closely integrated with the New York State Department of Health's Division of Systems (DOS) and Division of Eligibility and Marketplace Integration (DEMI), and a number of staff from these two Divisions are dedicated to the NYSOH program. As of July 20, 2021, there are 92 full-time Marketplace staff and 188 DOS and DEMI staff who work on information systems and eligibility and enrollment which benefit both the Marketplace and public programs. In total, there are 280 staff, including full-time Marketplace, Marketplace and Medicaid, and Systems staff.

NYSOH's IT system integrator is the CSRA State and Local Solutions, LLC (CSRA) which has held the contract to design, develop, operate, and enhance the NYSOH IT system since 2012. CSRA worked intensely to build the NYSOH Marketplace in time for open enrollment in October 2013 and the launch was widely considered to be one of the most successful in the nation. Since initial implementation, CSRA has successfully operated and enhanced the NYSOH system in a manner that has kept pace with policy developments and growing use of the Marketplace, helping the Department to achieve record enrollment numbers.

The NYSOH Marketplace has a strong organizational structure and dedicated leadership who will be leveraged to ensure that planned activities are executed and operated in a coordinated and efficient manner. The Department will apply proven management and coordination mechanisms that have resulted in the successful evolution and operation of the Marketplace since its inception.

The Department requires that its vendors adhere to System Development Life Cycle (SDLC) best practices and leverages established relationships with stakeholders to include affected system end users in identifying needs and completing user acceptance testing (UAT).

These practices, including rigorous documentation and approval of requirements; creation and monitoring of project management plans; regular reporting and management meetings to review all project progress; routine security reviews; and ensure new system development meets the functional needs of end users in addition to technical specifications.

The Department is supported in this oversight and coordination by a Quality Assurance and Independent Validation & Verification (QA) vendor that assists with deliverable review and monitoring progress. In keeping with the established NYSOH QA methodology, the vendor is responsible for monitoring compliance with Department approved work schedules, and independently evaluates project risks and issues. The overall status of the project and any QA findings are reported to the Department during regular review meetings, along with any suggested corrective actions. This process ensures that any activities that might not be on track for successful completion are promptly communicated and appropriately mitigated so that they do not endanger overall project success.

OpAD Media is responsible for implementing NYSOH advertising campaigns related to ARPA under this funding opportunity. OpAD Media a full-service media buying and planning firm composed of a team of media experts who understand local media needs and provide data-driven analytics with the industry's highest level of service and professionalism. They have worked with the New York State Department of Health for over fifteen years and annually execute more than 150 initiatives under the public health umbrella, including NYSOH Open Enrollment, Coronavirus and Vaccination with a heavy emphasis on reaching multi-lingual and ethnic communities. The OpAd Media Contract for NY State of Health is managed and overseen by the NYSOH Director of Communications (Marci Natale). Weekly and bi-weekly status and performance calls are held to evaluate budget, assets and performance and to ensure that the



media buy, which is being executed for various campaigns that run throughout the year, is consistent with approved media plans and budget flow-charts.

Language Line Solutions is NYSOH's vendor for the full spectrum of language access services. NYSOH translates written content in up to 26 languages. Marci Natale, NY State of Health Director of Communications, and Kelvin Sapp, NY State of Health Communications and Outreach Project Coordinator, will oversee these activities, working with the Department of Health's Public Affairs Group and the Department of Health's Language Access Coordinator. Translation requests are uploaded to an online system, LingoNet, through which NYSOH reviews and approves project estimates and timelines, downloads completed deliverables, and generates reports as needed. Completed translations are reviewed for consistency with NYSOH standards defined in our Style Guide and Branding Guidelines, and previously translated material that applies similar concepts.

The Exchange Modernization Project described in this funding request will be managed by the team described below:

- **Deputy Director, NY State of Health/Project Sponsor (Danielle Holahan)** to oversee project progress, provide executive management, and assist with risk management and issue resolution as needed.
- **New York State Medicaid and NYSOH Chief Information Officer/Project Director (Michael Thibdeau)** to oversee project progress and support the project manager in risk identification, mitigation strategy development, and issue resolution; support initial tier escalation of issues and approval of risk mitigation strategies.
- **Division of Systems NYSOH Bureau Director/Project Manager (Bill Kerr)** to oversee day-to-day project progress, supervising the activities of team leads and contractor staff;

actively monitor project issues and participate in the development of risk mitigation strategies and their implementation.

- **Division of Systems NYSOH Operations Management (Dori Blanchard)** to assist the Project Manager in overseeing and managing the day-to-day activities associated with NYSOH Design Development, and Implementation and operations under the system integrator contract, including overseeing the system integrator during all project phases.
- **Division of Systems NYSOH Technical Architecture Team** to support the teams described above, in addition to assisting the Project Manager, through advising on system design, requirements, testing, implementation, maintenance, and resolution of technical issues.
- **Director, NYSOH Policy and Evaluation (Sonia Sekhar)** to work with the Division of Systems NYSOH Bureau Director and Operations Manager to oversee the development of system requirements and deployment to ensure they meet state and federal requirements.
- **Director, NYSOH Communications (Marci Natale)** will oversee the advertising campaign, managing the OpAD Media contractor during all project phases, and will oversee the ARPA consumer education and outreach campaign.
- **Project Coordinator, NYSOH Communications and Outreach (Kelvin Sapp)** will oversee the activities of the translation services vendor to ensure all deliverables are met and will coordinate consumer outreach activities.