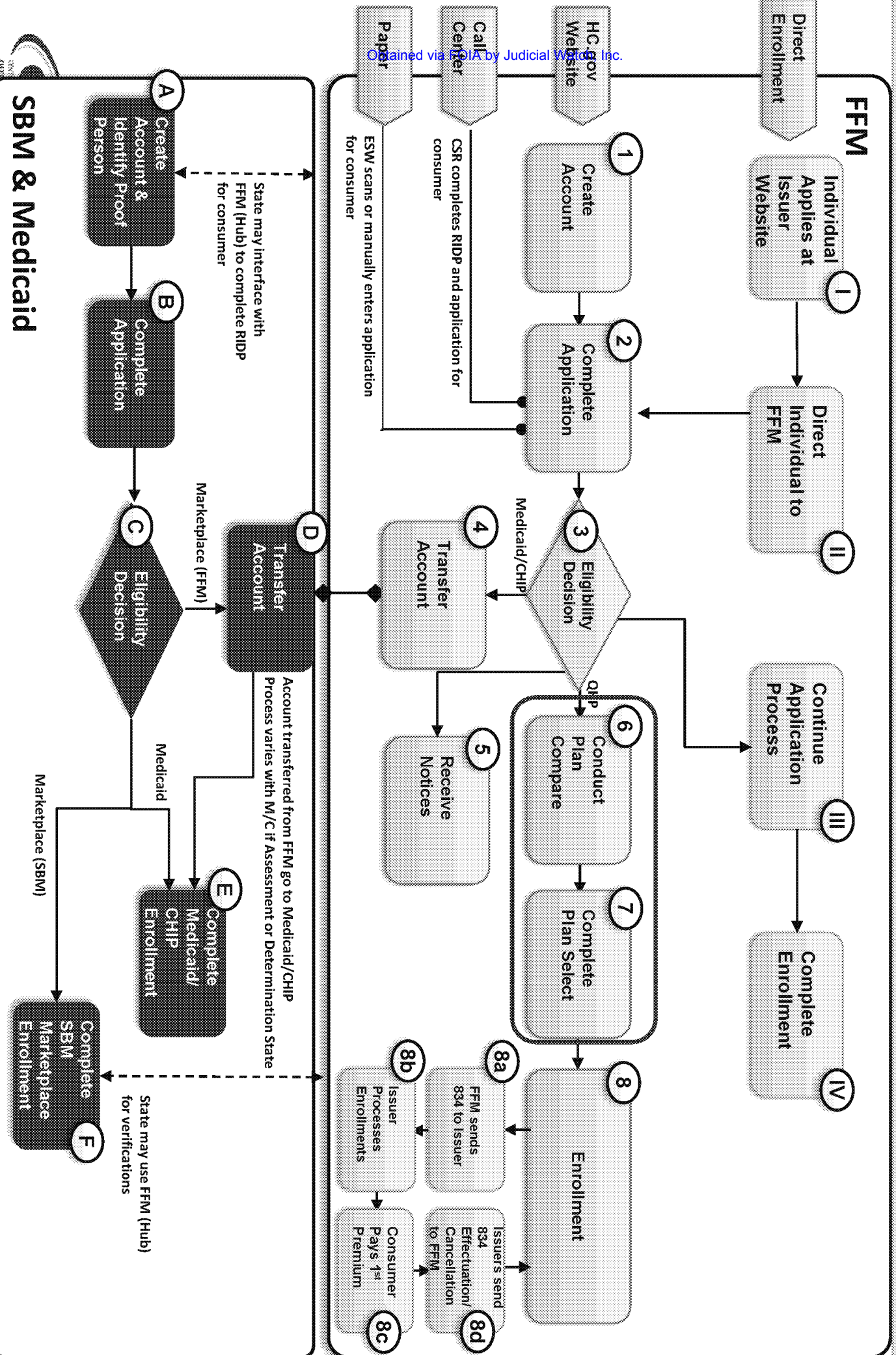


Topic: Plan Compare and Plan Select



- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Overview

6

Conduct Plan Compare

7

Complete Plan Select

Business Process Step: Plan Compare and Plan Select

Summary: Compare eligible plans and select a plan for enrollment

Systems (or major external partners) Impacted

| System | Impacted (Yes/No) | Brief Comments |
|-------------------|-------------------|--|
| FFM | Yes | Marketing names for issuers/plans are retrieved by FFM for Plan Compare. HIOS is the system of record. |
| DSH | No | |
| MIDAS | No | |
| HIOS | Yes | |
| EIDM/RIDP | No | |
| RBS | No | |
| Enterprise Portal | No | |
| Edge Server | No | |
| HC.gov | No | |
| LMI | No | |
| NAIC SERFF | No | |
| OPM | No | |
| States | No | |
| Federal | No | |
| Other (specify) | No | |

- **10/1 Open Enrollment**
- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- *Plan Compare & Plan Select*
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- Appeals & SHOP

Development Status

Conduct
Plan
Compare

**Complete
Plan Select**

FFN

[illegible][illegible]

- **10/1 Open Enrollment**
- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- *Plan Compare & Plan Select*
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- Appeals & SHOP

Development Status

6 Conduct Plan Compare

7 Complete Plan Select

Hub

[illegible][illegible]

- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- *Plan Compare & Plan Select*
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- Appeals & SHOP

**Complete
Plan Select**

[illegible]

- **10/1 Open Enrollment**
- **Session I: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- *Plan Compare & Plan Select*
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- Appeals & SHOP

Testing Status

6

Conduct Plan Compare

7

Complete Plan Select

FFM (Independent Testing)

| Test Case Status | | | | |
|-------------------|---------------------|-------------------|-------------------|--|
| Test Case Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed | |
| ~450 | Not Started | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

| Defect Summary | | | |
|----------------|----------------|----------|--|
| Defect Level | Nbr of Defects | Comments | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Test Data Status

Obtained via FOIA by Judicial Watch, Inc.



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
 This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- *Plan Compare & Plan Select*
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- Appeals & SHOP

10/1 Open Enrollment

Testing Status

6 Conduct Plan Compare

7 Complete Plan Select

UAT and External Testing

| Test Case Status | | | | |
|--------------------------|--------------------|---------------------|-------------------|-------------------|
| External Partner | Test Cases Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed |
| Direct Enrollment Issuer | 45 | Not Started | | |
| FFM Issuer | 6 | Not Started | | |
| SBM States | 10 | Not Started | | |
| | | | | |

| Defect Summary | | | |
|----------------|--|----------------|----------|
| Defect Level | | Nbr of Defects | Comments |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Test Data Status

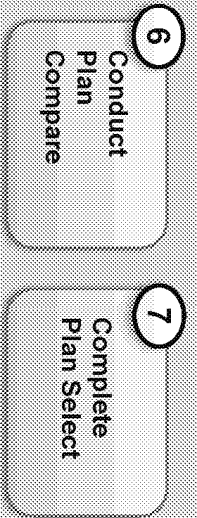


- 10/1 Open Enrollment

 - Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select*
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Demonstration

/Walkthrough



Guidance

1. For UI components, perform a demonstration or screen walkthrough.

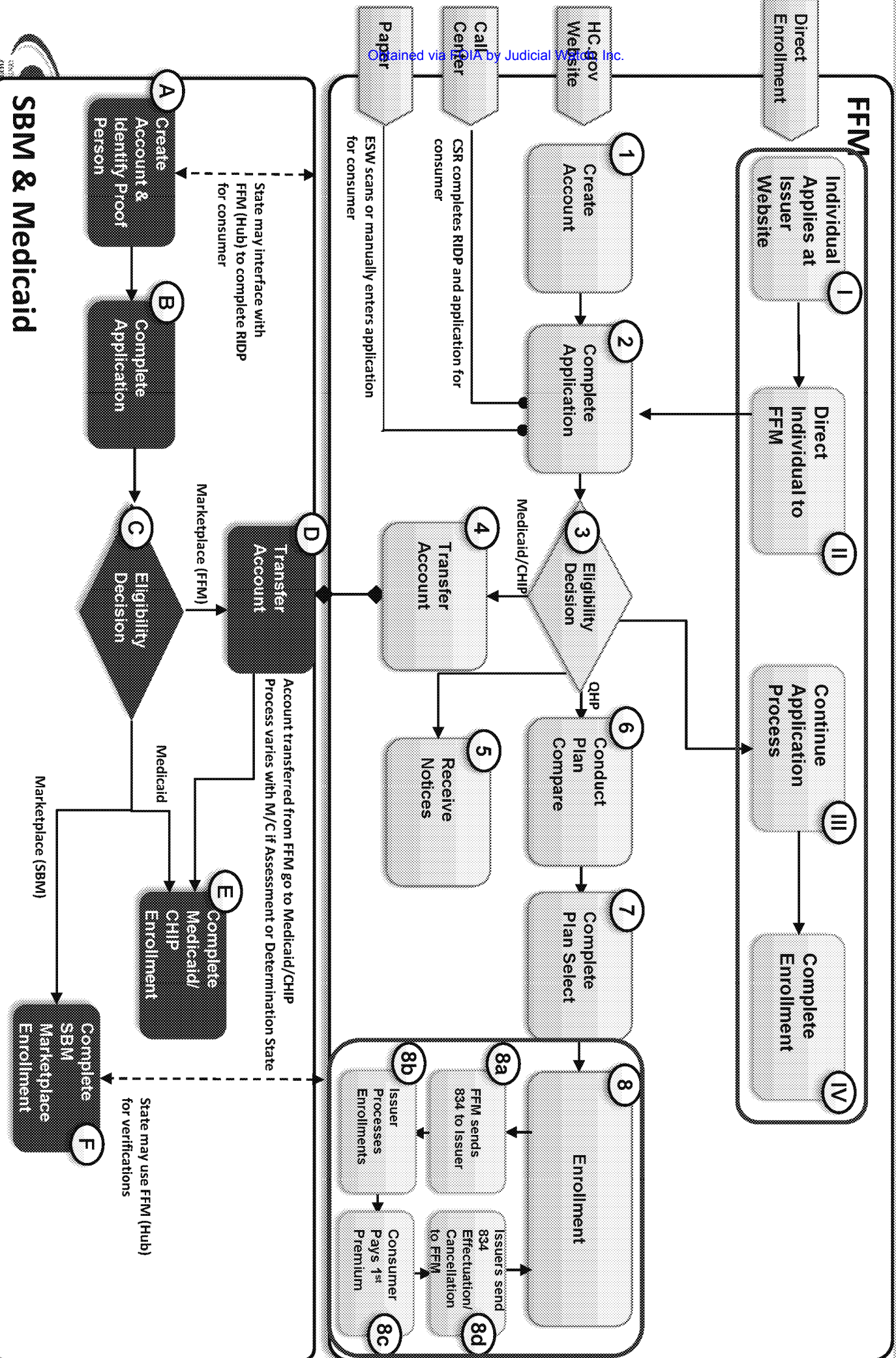
2. For other functions without a UI, illustrate and walkthrough the functional/data flow.

Obtained via FOIA by Judicial Watch, Inc.



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
 This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

Topic: Enrollment and Direct Enrollment



- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Overview

8

Enrollment

Business Process Step: Enrollment and Direct Enrollment

Summary: Interact with issuers to send/receive initial enrollments, cancelations, terminations and enrollment changes as well as provide capabilities for issuers to redirect consumers from their websites to the FFM for QHP/APTC eligibility determination

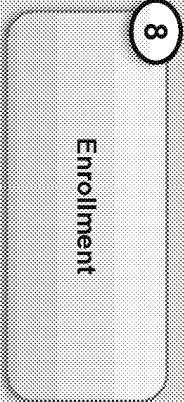
Systems (or major external partners) Impacted

| System | Impacted (Yes/No) | Brief Comments |
|-------------------|-------------------|---|
| FFM | Yes | Issuers receive and send enrollment transactions through the DSH. DHS hosts Direct Enrollment services used by issuers. |
| DSH | Yes | |
| | | |
| | | |
| MIDAS | No | |
| HIOS | No | |
| EIDM/RIDP | No | |
| RBS | No | |
| Enterprise Portal | No | |
| Edge Server | No | |
| HC.gov | No | |
| LMI | No | |
| NAIC SERFF | No | |
| OPM | No | |
| States | No | |
| Federal | No | |
| Issuer Websites | Yes | Consumers will be redirected to/from FFM from the issuer's website for Direct Enrollment |

- 10/1 Open Enrollment

 - Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Stakeholders/Users & Volume Forecast



Relevant Stakeholders & Users

- DSH
- Issuers
- Individual Consumers

Volume (assumptions)

- FFM Individ. Exchange Initial Enrollments – 5,950,000
- FFM Individ. Exchange Enrollment Cancellations/Terminations/Up dates/etc – 1,428,000
- FFM Average Applications/Hour – 26,010
- Peak FFM Applications/Hour – 65,025
- Assuming 30 minutes per average application, ~32K concurrent users during peak

Obtained via FOIA by Judicial Watch, Inc.



71

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- *Enrollment & Direct Enrollment*
- Operational Reporting/Analytics
- Appeals & SHOP

Development Status

Enrollment

FFN

[illegible]

Artifacts/Evidence (provide a link)

Scope / CR Issues?

Risks (provide CALT ID/link)

Obtained via FOIA by Judicial Watch, Inc.



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is not authorized to receive the information. Unauthorized disclosure may result in prosecution.

72
may only and must not be disseminated, distributed, or copied to persons
law.

Enrollment

Obtained via FOIA by Judicial Watch, Inc.

[illegible]

- 8 Enrollment

[illegible]

CMS
CENTERS FOR MEDICARE & MEDICAID
OFFICE OF INFORMATION SERVICES

- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- *Enrollment & Direct Enrollment*
- Operational Reporting/Analytics
- Appeals & SHOP

Integration Status



Enrollment

| Integration / Interface (end point – to – end point) | Requirements & Design Complete and Delivered | Development Status Complete and Delivered | Artifacts/Evidence (provide a link) |
|---|---|--|--|
| FFM-DSH | Yes | No (7/31) | |
| FFM-Issuer Websites | Yes | No (7/31) | |
| | | | |
| | | | |

[illegible]

- **10/1 Open Enrollment**
- **Session I: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- **Enrollment & Direct Enrollment**
- Operational Reporting/Analytics
- Appeals & SHOP

Testing Status

8

Enrollment

FFM (Independent Testing)

| Test Case Status | | | | |
|-------------------|---------------------|-------------------|-------------------|--|
| Test Case Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed | |
| ~450 | Not Started | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

| Defect Summary | | | |
|----------------|----------------|----------|--|
| Defect Level | Nbr of Defects | Comments | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Test Data Status

Obtained via FOIA by Judicial Watch, Inc.



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
 This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- **10/1 Open Enrollment**
- **Session I: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- *Enrollment & Direct Enrollment*
- Operational Reporting/Analytics
- Appeals & SHOP

Testing Status

8

Enrollment

Hub (Independent Testing)

| Test Case Status | | | | |
|--|-----------------------|-------------------|-------------------|--|
| Test Case Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed | |
| H20 R6 – Internal Testing Only | Internal Testing Only | | | |
| H67 R6 – No Test Data, Internal Testing Only | Internal Testing Only | | | |
| H68 R6 – No Test Data, Internal Testing Only | Internal Testing Only | | | |
| | | | | |

Obtained via FOIA by Judicial Watch, Inc.

Test Data Status

- No test data developed for H67 (Fetch Eligibility) or H68 (Enrollment)



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
 This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- **10/1 Open Enrollment**
- **Session I: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- **Enrollment & Direct Enrollment**
- Operational Reporting/Analytics
- Appeals & SHOP

Testing Status

8

Enrollment

UAT and External Testing

| Test Case Status | | | | |
|--------------------------|--------------------|---------------------|-------------------|-------------------|
| External Partner | Test Cases Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed |
| Direct Enrollment Issuer | 45 | Not Started | | |
| FFM Issuer | 6 | Not Started | | |
| SBM States | 10 | Not Started | | |
| | | | | |

| Defect Summary | | | |
|----------------|--|----------------|----------|
| Defect Level | | Nbr of Defects | Comments |
| | | | |
| | | | |
| | | | |
| | | | |

Test Data Status



| |
|--|
| 10/1 Open Enrollment |
| <ul style="list-style-type: none"> • Session I: Readiness to Support Business Processes • My Account and Application • Eligibility, Notices, Account Transfer • Plan Compare & Plan Select • <i>Enrollment & Direct Enrollment</i> • Operational Reporting/Analytics • Appeals & SHOP |

Demonstration /Walkthrough

8

Enrollment

Obtained via FOIA by Judicial Watch, Inc.

Guidance

1. For UI components, perform a demonstration or screen walkthrough.

2. For other functions without a UI, illustrate and walkthrough the functional/data flow.



Topic: Operational Reporting and Analytics

FFM

1

2

3

4

Direct
Enrollment

HC.gov
Website

Call
Center

Paper

Obtained via FOIA by Judicial Watch, Inc.

A

SBIM & Medicare

Operational Reporting and Analytics
MMI/Executive reports from MIDAS
E&E day 1 metrics for CCIO
SHOP PM related metrics

3c

3d

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Overview

Reporting and Analytics

Business Process Step: Reporting and Analytics

Summary: MIDAS will provide the analytics for all market place data.

For 10/1, the deliverables include, the Health Insurance Marketplace Management Information Dashboard (HIMMID), E&E Day 1 metrics and SHOP PM metrics The metrics are based on data from Plan Management, Enrollment, Enrollment Data store and DSH.

Systems (or major external partners) Impacted

| System | Impacted (Yes/No) | Brief Comments |
|-------------------|-------------------|---|
| FFM | Yes | Data will be pulled into MIDAS from FFM. Connectivity should be established |
| DSH | Yes | Data will be pulled into MIDAS from FFM. Connectivity should be established |
| MIDAS | Yes | Reports will be generated from MIDAS |
| HIOS | | |
| EIDM/RIDP | | |
| RBIS | | |
| Enterprise Portal | | |
| Edge Server | | |
| HC.gov | | |
| LMI | | |
| NAIC SERFF | | |
| OPM | | |
| States | | |
| Federal | | |
| Other (specify) | | |

Obtained via FOIA by Judicial Watch, Inc.



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- 10/1 Open Enrollment

 - Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - *Operational Reporting/Analytics*
 - Appeals & SHOP

Stakeholders/Users & Volume Forecast

Reporting and Analytics

Relevant Stakeholders & Users

- Office of Enterprise Management (OEM)
- Internal CCIO business users: HIMMID, E&E and SHOP groups
- Internal CMS CISG users

Volume

- To be determined
- Data volumes are directly related to FFM and DSH volumes

Define how you are defining “transaction” and then expected transaction volume per timeframe.

Obtained via FOIA by Judicial Watch, Inc.



- 10/1 Open Enrollment
- **Session I: Readiness to Support Business Processes**
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - *Operational Reporting/Analytics*
 - Appeals & SHOP

Architecture Overview

Reporting and Analytics

MIDAS Web Portal

Obtained via FOIA by Judicial Watch, Inc.

NotResp

10/1 Open Enrollment

- Session 1: Readiness to Support Business Processes
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- Appeals & SHOP

Reporting and Analytics

Development Status

MIDAS

| Function/Service/Module | Requirements & Scope Complete & Delivered (Y/N) | Design Completed & Delivered (Y/N) | Development Completed & Delivered (Y/N) | Internal Developer Testing Completed (Y/N) |
|---|--|------------------------------------|--|--|
| Content Pump: Data pull from FFM/DSH to MIDAS | Y | Y | Y | Y |
| Flattening of XML data | Y | Y | In Progress | N |
| MMI metrics/Dashboard | N –baselining using 7/8/13 version | Y | N | N |
| E&E day 1 metrics | Y | Y | N | N |
| SHOP PM metrics | Y – Initial Scope defined but re-baselining with source data availability | N | N | N |
| | | | | |
| | | | | |
| Artifacts/Evidence (provide a link) | Scope / CR Issues? | | Risks (provide CALT ID/link) | |
| BRD, Models, Master Maps are completed for Sprint 1 of MMI metrics. They are checked into SVN | Metrics from HIMMID group are yet to be finalized – Baselining with 7/8/13 version | | Mismatch of data(XML) from data definitions (XSD): NotResp | |
| | Data Structures from Source systems are yet to be finalized; There continue to be significant differences between each version of data definitions MIDAS receives from FFM | | Performance testing environment unavailable from source systems: NotResp | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- *Operational Reporting/Analytics*
- Appeals & SHOP

Integration Status

Reporting and Analytics

| Integration / Interface (end point – to – end point) | Requirements & Design Complete and Delivered | Development Status Complete and Delivered | Artifacts/Evidence (provide a link) |
|---|---|--|--|
| FFM – MIDAS Integration | Y | N – issues in Prod Prime | |
| DSH – MIDAS integration | Y | N – issues in Prod Prime | |
| OEM – MIDAS integration | N | N – Design TBD | |
| | | | |

[illegible]

- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- *Operational Reporting/Analytics*
- Appeals & SHOP

Testing Status

Reporting and Analytics

MIDAS

| Test Case Status | | | |
|-------------------|---------------------|-------------------|-------------------|
| Test Case Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

| Defect Summary | | | | |
|----------------|--|----------------|--|----------|
| Defect Level | | Nbr of Defects | | Comments |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Obtained via FOIA by Judicial Watch, Inc.

Test Data Status



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
 This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- **10/1 Open Enrollment**
- **Session I: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- *Operational Reporting/Analytics*
- Appeals & SHOP

Testing Status

Reporting and Analytics

UAT and External Testing

| Test Case Status | | | | |
|------------------|--------------------|---------------------|-------------------|-------------------|
| External Partner | Test Cases Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed |
| Reporting - TBD | | | | |
| Analytics - TBD | | | | |
| | | | | |
| | | | | |

| Defect Summary | | | |
|----------------|----------------|----------|--|
| Defect Level | Nbr of Defects | Comments | |
| | | | |
| | | | |
| | | | |
| | | | |

Test Data Status



| |
|---|
| 10/1 Open Enrollment |
| <ul style="list-style-type: none"> Session I: Readiness to Support Business Processes My Account and Application Eligibility, Notices, Account Transfer Plan Compare & Plan Select Enrollment & Direct Enrollment Operational Reporting/Analytics Appeals & SHOP |

Demonstration /Walkthrough

Reporting and Analytics

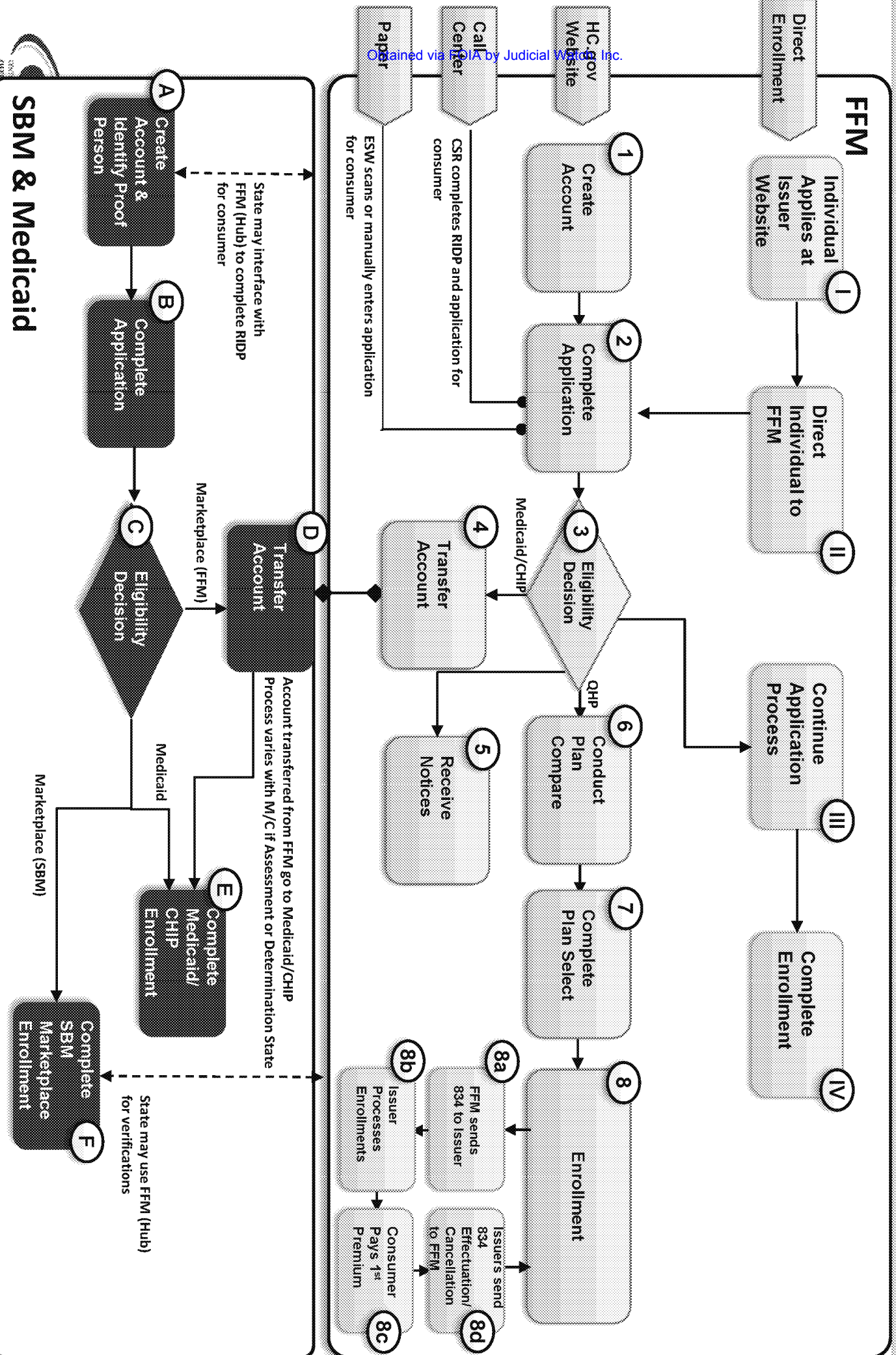
Obtained via FOIA by Judicial Watch, Inc.

Guidance

- For UI components, perform a demonstration or screen walkthrough.
- For other functions without a UI, illustrate and walkthrough the functional/data flow.



Topic: Appeals and SHOP



- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Overview

Appeals and SHOP

Business Process Step: Appeals and SHOP

Summary: Functionality for Employers and Employees to complete an online application and select a QHP for enrollment as well as capabilities for consumers to appeal their eligibility determination(s)

Systems (or major external partners) Impacted

| System | Impacted (Yes/No) | Brief Comments |
|-------------------|-------------------|--|
| FFM | Yes | Provide SHOP and appeal functionalities |
| DSH | Yes | Determine employee eligibility (e.g., Indian status) |
| MIDAS | Yes | Report on application status and outcomes |
| HIOS | Yes | FFM will retrieve marketing names for issuers/plans from HIOS (system of record) |
| EIDM/RIDP | Yes | Authentication of Employer/Employees |
| RBS | No | |
| Enterprise Portal | No | |
| Edge Server | No | |
| HC.gov | Yes | Integration of content, headers, footers, notifications through GovDelivery |
| LMI | No | |
| NAIC SERFF | No | |
| OPM | No | |
| States | No | |
| Federal | Yes | Verification information provided to FFM via the DSH |
| Other (specify) | No | |

Obtained via FOIA by Judicial Watch, Inc.



- Session 1: Readiness to Support Business Processes
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- Appeals & SHOP

Stakeholders/Users & Volume Forecast

Appeals and SHOP

Relevant Stakeholders & Users

- Employers
- Employees
- Issuers

Volume (assumed for SHOP)

- FFE SHOP. Exchange Initial Enrollments -- 1,700,000
- FFE SHOP Exchange Enrollment Cancellations/Terminations/Up dates/etc -- 408,000
- FFM Average Applications/Hour -- 7,431
- Peak FFM Applications/Hour -- 15,606

Obtained via FOIA by Judicial Watch, Inc.



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

Session I: Readiness to Support Business Processes

- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- *Appeals & SHOP*

Appeals and SHOP

[illegible][illegible]

- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- *Appeals & SHOP*

Development Status

Appeals and SHOP

Hub

[illegible][illegible]

- ## Appeals and SHOP

Status

[illegible]

Risks (provide CALT ID/link)

[illegible]

- **10/1 Open Enrollment**
- **Session I: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- *Appeals & SHOP*

Development Status

Appeals and SHOP

HC.gov

[illegible][illegible]

Session I: Readiness to Support Business Processes

- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- *Appeals & SHOP*

Appeals and SHOP

[illegible]

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Testing
Status

Appeals and SHOP

FFM (Independent Testing)

| Test Case Status | | | | |
|-------------------|---------------------|-------------------|-------------------|--|
| Test Case Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed | |
| Appeals TBD | | | | |
| SHOP - TBD | | | | |
| | | | | |
| | | | | |

| Defect Summary | | | |
|----------------|----------------|----------|--|
| Defect Level | Nbr of Defects | Comments | |
| | | | |
| | | | |
| | | | |
| | | | |

Test Data Status



- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Testing
Status

Appeals and SHOP

Hub (Independent Testing)

| Test Case Status | | | | |
|-------------------|---------------------|-------------------|-------------------|--|
| Test Case Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

| Defect Summary | | | |
|----------------|----------------|----------|--|
| Defect Level | Nbr of Defects | Comments | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Test Data Status



- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Testing Status

Appeals and SHOP

MIDAS (Independent Testing)

| Test Case Status | | | | |
|-------------------|---------------------|-------------------|-------------------|--|
| Test Case Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

| Defect Summary | | | |
|----------------|----------------|----------|--|
| Defect Level | Nbr of Defects | Comments | |
| | | | |
| | | | |
| | | | |
| | | | |

Test Data Status



- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Testing Status

Appeals and SHOP

HC.gov

| | | | | |
|-------------------|---------------------|-------------------|-------------------|--|
| Test Case Status | | | | |
| Test Case Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

| | | | |
|----------------|----------------|----------|--|
| Defect Summary | | | |
| Defect Level | Nbr of Defects | Comments | |
| | | | |
| | | | |
| | | | |
| | | | |

Test Data Status



- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics

Appeals & SHOP

Appeals and SHOP

| Test Case Status | | | | |
|------------------|--------------------|---------------------|-------------------|-------------------|
| External Partner | Test Cases Planned | Test Cases Executed | Test Cases Passed | Test Cases Failed |
| Appeals TBD | | | | |
| SHOP - TBD | | | | |
| | | | | |
| | | | | |

Test Data Status

| |
|---|
| 10/1 Open Enrollment |
| <ul style="list-style-type: none"> • Session I: Readiness to Support Business Processes • My Account and Application • Eligibility, Notices, Account Transfer • Plan Compare & Plan Select • Enrollment & Direct Enrollment • Operational Reporting/Analytics • Appeals & SHOP |

Demonstration /Walkthrough

Appeals and SHOP

Obtained via FOIA by Judicial Watch, Inc.

- Guidance
1. For UI components, perform a demonstration or screen walkthrough.
 2. For other functions without a UI, illustrate and walkthrough the functional/data flow.



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
 This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- **Session 1: Readiness to Support Business Processes**
- My Account and Application
- Eligibility, Notices, Account Transfer
- Plan Compare & Plan Select
- Enrollment & Direct Enrollment
- Operational Reporting/Analytics
- *Appeals & SHOP*

Risk & Workaround Planning

Appeals and SHOP

Scenario Handling

[illegible]

Obtained via FOIA by Judicial Watch, Inc.

Describe what happens when...

- Non Happy Path Scenarios (e.g., data sources are down, unable to RIDP a consumer)
- Functionality is deferred or downscoped functionality
- External partners not ready



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

Appendix – Architecture Overview



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - *My Account and Application*
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

23

Complete Application Eligibility Decision



Individual Application Flow (Eligibility)

NotResp

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - *My Account and Application*
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

1

Create Account Account Management

Obtained via FOIA by Judicial Watch, Inc.

NotResp



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

3

Eligibility Decision

Obtained via FOIA by Judicial Watch, Inc.

NotResp

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

3

Eligibility Decision

Obtained via FOIA by Judicial Watch, Inc.

NotResp

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

4

Account Transfer

Referrals from FFM to Medicaid/CHIP

Obtained via FOIA by Judicial Watch, Inc.

NotResp



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

| |
|--|
| 10/1 Open Enrollment |
| • Session I: Readiness to Support Business Processes |
| • My Account and Application |
| • Eligibility, Notices, Account Transfer |
| • Plan Compare & Plan Select |
| • Enrollment & Direct Enrollment |
| • Operational Reporting/Analytics |
| • Appeals & SHOP |

Architecture Overview

Referrals from Medicaid/CHIP to FFM

Obtained via FOIA by Judicial Watch, Inc.

NotResp



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

8

Enrollment

Obtained via FOIA by Judicial Watch, Inc.

NotResp



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - *Enrollment & Direct Enrollment*
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

Direct Enrollment

Obtained via FOIA by Judicial Watch, Inc.

NotResp



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - *Appendix & SHOP*

Architecture Overview

SHOP
Employer/
Employee

Obtained via FOIA by Judicial Watch, Inc.

NoResp



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:
This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the fullest extent of the law.

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - *My Account and Application*
 - *Eligibility, Notices, Account Transfer*
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

Call Center
(Individual
Market)

Obtained via FOIA by Judicial Watch, Inc.

NotResp

2017 RELEASE UNDER E.O. 14176

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - *Appendix & SHOP*

Architecture Overview

Call Center
(SHOP)

Obtained via FOIA by Judicial Watch, Inc.

NotResp



NOT AUTHORIZED TO RECEIVE THE INFORMATION. UNAUTHORIZED DISCLOSURE MAY RESULT IN PROSECUTION TO THE FULLEST EXTENT OF THE LAW.

- 10/1 Open Enrollment
- **Session I: Readiness to Support Business Processes**
 - My Account and Application
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - *Enrollment & Direct Enrollment*
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

Agents/
Brokers
(Individual
Market Only)

Obtained via FOIA by Judicial Watch, Inc.

NotResp

- 10/1 Open Enrollment
- Session I: Readiness to Support Business Processes
 - *My Account and Application*
 - Eligibility, Notices, Account Transfer
 - Plan Compare & Plan Select
 - Enrollment & Direct Enrollment
 - Operational Reporting/Analytics
 - Appeals & SHOP

Architecture Overview

Side By Side
Assisters

Obtained via FOIA by Judicial Watch, Inc.

NotResp

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 12/5/2013 6:01:17 PM
To: Alexander, David (CMS/OIS) [NotResp]
CC: [NotResp]
[NotResp] Wills, Theodora (CMS/OEM) [NotResp]
[NotResp] Reinhold, Leslie A. (CMS/OEM)
[NotResp] Fryer, Teresa M. (CMS/OIS)
[NotResp]
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

Leslie will need to handle that.

From: Alexander, David (CMS/OIS)
Sent: Thursday, December 05, 2013 12:59 PM
To: Schankweiler, Thomas W. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Wills, Theodora (CMS/OEM); Reinhold, Leslie A. (CMS/OEM); Fryer, Teresa M. (CMS/OIS)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

Tom – I hate to be a pain, but these need to be put into the template format (see attached).

Thanks

David Alexander, CISSP

410-786-3001

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Thursday, December 05, 2013 12:33 PM
To: Reinhold, Leslie A. (CMS/OEM); Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Wills, Theodora (CMS/OEM)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

All,

Here is the write up to close out 25244 in []

Data.healthcare.gov

11/19 - Socrata investigated their platform for any signs of malicious activity. First, the activity referred to is the public user profile search API which doesn't reveal any private user information that could be exploited. Second, there is no connection or integration between Socrata platform user accounts and healthcare.gov user accounts. They are completely separate. Third, Socrate has been monitoring and there are no indications of any malicious activity targeting the Socrata platform or data.healthcare.gov.

Please close this as a False Positive -99

Thanks,

Tom

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Thursday, December 05, 2013 11:42 AM
To: Reinhold, Leslie A. (CMS/OEM); Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Wills, Theodora (CMS/OEM)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

The one for Balaji is no the 25244. If that the healthcare.data.gov then I has sent you the threads on that from OC and you were going to write it up.

From: Reinhold, Leslie A. (CMS/OEM)
Sent: Thursday, December 05, 2013 11:39 AM
To: Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)
Subject: Re: HHS Request: IT Response Plans for 2 Tickets

Tom it's on that printout we looked at on Tuesday it's the last 2, the NotResp hat Balagi wrote up and [data.gov](#). I know we discussed the [data.gov](#) one. Write up what the deal is with that if we are closing it let me know.

Thanks

On Dec 5, 2013, at 11:33 AM, "Fryer, Teresa M. (CMS/OIS)" <Teresa.Fryer@cms.hhs.gov> wrote:
Ellen,

What is #25244, Tom has indicated he does not know what this is and you have indicated that both tickets are for Marketplace.

Teresa

From: Ambrosini, Ellen M. (CMS/OEM)
Sent: Wednesday, December 04, 2013 6:58 PM
To: Fryer, Teresa M. (CMS/OIS); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)
Cc: Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)
Subject: HHS Request: IT Response Plans for 2 Tickets
Importance: High

Good evening, Teresa-

We met with HHS today and they are requesting several HHS Response Plans on several tickets. Therefore, please complete a Response Plan (template attached) for the below two IT tickets from the Marketplace:

- [NotResp] 24913, [NotResp] # INC000002589982 (see below for status)
- [NotResp] 25244, N/A [NotResp] ticket as this was entered by CMS IRT.

We will be preparing a Response Plan for several tickets covering an issue regarding potential PII violations and will ask you to review / input the IT section, as necessary.

All of these plans are due to the Department before COB on Friday, December 6th. We asked for an extension today and was told that the information is required on Friday.

Please let me know if you have any questions.

Thank you,

Ellen M. Ambrosini

Acting Director, Division of Privacy Policy

Privacy Policy Compliance Group, Office of E-Health Standards & Services

Centers for Medicare & Medicaid Services

7500 Security Boulevard

Baltimore, Maryland 21244

410-786-6918

<image001.jpg>

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Schankweiler, Thomas W. (CMS/OIS)

Sent: Tuesday, December 03, 2013 1:02 PM

To: Reinhold, Leslie A. (CMS/OEM)

Subject: Fw: INC000002589982

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [<mailto:balajimanikandan.ramamoorthy@cgifederal.com>]

Sent: Tuesday, December 03, 2013 12:31 PM

To: Schankweiler, Thomas W. (CMS/OIS); Warren, Kevin (CMS/OIS); Lyles, Darrin V. (CMS/OIS); sbanks@foregroundsecurity.com <sbanks@foregroundsecurity.com>

Cc: FFM Security Defects <FFMSecurityDefects@cgifederal.com>; Martin, Rich (CGI Federal)

<Rich.Martin@cgifederal.com>; Promisel, Andrew L (CGI Federal) <andy.promisel@cgifederal.com>; Alford, Justin (CGI Federal) <justin.alford@cgifederal.com>

Subject: INC000002589982

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] the URL that provides the EligibilityNotice.pdf. If the [NotResp] on the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into [HealthCare.gov](https://www.healthcare.gov), a user could script a [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp]. All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

Message

From: Schankweiler, Thomas W. (CMS/OIS); [NotResp]
[NotResp]
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 12/5/2013 5:33:08 PM
To: Reinhold, Leslie A. (CMS/OEM); [NotResp]
[NotResp]; Fryer, Teresa M. (CMS/OIS); [NotResp]
CC: Ambrosini, Ellen M. (CMS/OEM); [NotResp]
[NotResp]; Alexander, David (CMS/OIS); [NotResp]
[NotResp]; Wills, Theodora (CMS/OEM); [NotResp]
[NotResp]
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

All,

Here is the write up to close out 25244 in [NotResp]

Data.healthcare.gov

11/19 - Socrata investigated their platform for any signs of malicious activity. First, the activity referred to is the public user profile search API which doesn't reveal any private user information that could be exploited. Second, there is no connection or integration between Socrata platform user accounts and healthcare.gov user accounts. They are completely separate. Third, Socrate has been monitoring and there are no indications of any malicious activity targeting the Socrata platform or data.healthcare.gov.

Please close this as a False Positive -99

Thanks,

Tom

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Thursday, December 05, 2013 11:42 AM
To: Reinhold, Leslie A. (CMS/OEM); Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Wills, Theodora (CMS/OEM)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

The one for Balaji is no the 25244. If that the healthcare.data.gov then I has sent you the threads on that from OC and you were going to write it up.

From: Reinhold, Leslie A. (CMS/OEM)
Sent: Thursday, December 05, 2013 11:39 AM
To: Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Reinhold, Leslie

A. (CMS/OEM); Wills, Theodora (CMS/OEM)

Subject: Re: HHS Request: IT Response Plans for 2 Tickets

Tom it's on that printout we looked at on Tuesday it's the last 2, the **NotResp** that Balagi wrote up and [data.gov](#). I know we discussed the [data.gov](#) one. Write up what the deal is with that if we are closing it let me know.

Thanks

On Dec 5, 2013, at 11:33 AM, "Fryer, Teresa M. (CMS/OIS)" <Teresa.Fryer@cms.hhs.gov> wrote:
Ellen,

What is #25244, Tom has indicated he does not know what this is and you have indicated that both tickets are for Marketplace.

Teresa

From: Ambrosini, Ellen M. (CMS/OEM)

Sent: Wednesday, December 04, 2013 6:58 PM

To: Fryer, Teresa M. (CMS/OIS); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)

Cc: Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)

Subject: HHS Request: IT Response Plans for 2 Tickets

Importance: High

Good evening, Teresa-

We met with HHS today and they are requesting several HHS Response Plans on several tickets. Therefore, please complete a Response Plan (template attached) for the below two IT tickets from the Marketplace:

- **NotResp** # 24913, **NotResp** # INC000002589982 (see below for status)
- **NotResp** # 25244, N/A **NotResp** ticket as this was entered by CMS IRT.

We will be preparing a Response Plan for several tickets covering an issue regarding potential PII violations and will ask you to review / input the IT section, as necessary.

All of these plans are due to the Department before COB on Friday, December 6th. We asked for an extension today and was told that the information is required on Friday.

Please let me know if you have any questions.

Thank you,

Ellen M. Ambrosini

Acting Director, Division of Privacy Policy

Privacy Policy Compliance Group, Office of E-Health Standards & Services

Centers for Medicare & Medicaid Services

7500 Security Boulevard

Baltimore, Maryland 21244

410-786-6918

<image001.jpg>

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Tuesday, December 03, 2013 1:02 PM
To: Reinhold, Leslie A. (CMS/OEM)
Subject: Fw: INC000002589982

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]
Sent: Tuesday, December 03, 2013 12:31 PM
To: Schankweiler, Thomas W. (CMS/OIS); Warren, Kevin (CMS/OIS); Lyles, Darrin V. (CMS/OIS); sbanks@foregroundsecurity.com <sbanks@foregroundsecurity.com>
Cc: FFM Security Defects <FFMSecurityDefects@cgifederal.com>; Martin, Rich (CGI Federal) <Rich.Martin@cgifederal.com>; Promisel, Andrew L (CGI Federal) <andy.promisel@cgifederal.com>; Alford, Justin (CGI Federal) <justin.alford@cgifederal.com>
Subject: INC000002589982

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] the URL that provides the EligibilityNotice.pdf. If the [NotResp] on the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into HealthCare.gov, a user could script a [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp]. All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
 on behalf of [NotResp]
Sent: 12/3/2013 1:52:09 PM
To: Youd, Hank (CMS/CTR) [NotResp]
 [NotResp] Warren, Kevin (CMS/OIS)
 [NotResp]
CC: Villar, Manuel (CMS/CTR) [NotResp]
 [NotResp]
Subject: FW: Security Items that Need Attention

Kevin and Hank,

We need to work on this in the afternoon.

Kevin you setup a meeting from noon-1pm please.

Hank, in preparation for the meeting I need a report (spreadsheet or something) of what these remedy incidents are and if they are currently open or closed.

Thanks,

Tom

From: Coutts, Todd (CMS/OIS)
Sent: Tuesday, November 26, 2013 3:48 PM
To: Schankweiler, Thomas W. (CMS/OIS); Kane, David (CMS/OIS); Michael Finkel
Cc: Warren, Kevin (CMS/OIS); Fletcher, John A. (CMS/OIS); Van, Hung B. (CMS/OIS); Grothe, Kirk A. (CMS/OIS); Lyles, Darrin V. (CMS/OIS); 'Venky Natarajan' (vnatarajan@qssinc.com) (vnatarajan@qssinc.com); lynn.goodrich@cgifederal.com; Thomas.Kirk@gss-cgi.com; 'Ramamoorthy, Balaji Manikandan (CGI Federal)' (balajimanikandan.ramamoorthy@cgifederal.com); Outerbridge, Monique (CMS/OIS)
Subject: Security Items that Need Attention

QSSI and CGI,

I am writing to highlight several security incidents that need your attention. As they are security issues, please consider the [NotResp] ticket your authorization to act. I am only sending the [NotResp] numbers to avoid transmitting too much detail. By tomorrow, please communicate back to use their status (closed, in process, etc) and at least a tentative date for resolution.

1. These are the two that Tom Schankweiler raised today.
 - INC000002589982
 - artf161265 INC2598675

2. Additionally, we identified several open tickets in [NotResp]
 - 2614246

- 2614253
- 2614255
- 2614297
- 2614299
- 2614303
- 2614304
- 2614305
- 2614307
- 2614309
- 2614310
- 2614311
- 2614313
- 2614316
- 2614317
- 2614318
- 2614319
- 2614320
- 2614321
- 2614322
- 2614323
- 2614324
- 2614325
- 2614326
- 2614328
- 2614329
- 2614330
- 2614331
- 2614332
- 2614327
- 2614333
- 2614334
- 2614335
- 2614336
- 2614337
- 2614338
- 2614339
- 2614340
- 2614341

Todd Coutts

Centers for Medicare & Medicaid Services

Office of Information Services

301-492-5139 (office) | (b)(6) mobile) | todd.couts1@cms.hhs.gov

7700 Wisconsin Ave Bethesda MD 20814 | Location: 9308

From: Schankweiler, Thomas W. (CMS/OIS)

Sent: Tuesday, November 26, 2013 12:41 PM

To: Coutts, Todd (CMS/OIS); Kane, David (CMS/OIS); Michael Finkel

Cc: Warren, Kevin (CMS/OIS); Fletcher, John A. (CMS/OIS); Van, Hung B. (CMS/OIS); Grothe, Kirk A. (CMS/OIS); Lyles, Darrin V. (CMS/OIS)

Subject: INC000002589982 Need details regarding

NotResp

Todd,

I would like to escalate this ticket NC000002589982 as being high risk on the defect list. I know that a bunch of security risk have recently appeared on the list but I wanted to let you know this one is considered high priority. In total we now have two tickets that are considered high priority. Contact me if you have any questions.

Thanks,

Tom

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]

Sent: Tuesday, November 26, 2013 10:52 AM

To: Schankweiler, Thomas W. (CMS/OIS); Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal); Alford, Justin (CGI Federal); Martin, Rich (CGI Federal)

Subject: RE: artf160711 / INC000002589982 Need details regarding

NotResp

Hi Tom,

We promoted the code fix into production. Apparently the security enforcement is turned off.

The **NotResp** documents (notices) that are saved are not having the proper meta data populated to turn on the enforcements. So in addition to the fix that has been rolled in the following actions needs to occur.

1. Do a manual batch job to update the meta data for all the existing notices.
2. Have the developers fix the code so that any new notices that are saved has the proper metadata for enforcement.

These 2 action items are being coordinated internally right now. We don't have an ETA yet.

Thanks

Balaji M. Ramamoorthy

From: Schankweiler, Thomas W. (CMS/OIS) [mailto:thomas.schankweiler@cms.hhs.gov]

Sent: Tuesday, November 26, 2013 10:42 AM

To: Ramamoorthy, Balaji Manikandan (CGI Federal); Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: artf160711 / INC000002589982 Need details regarding

NotResp

Balaji, Adam, and Kevin

I am looking for an update on this ticket. Can someone provide be a status of where we are with this item? Has it been corrected? Is the situation still occurring?

Thanks,

Tom

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]

Sent: Wednesday, November 06, 2013 12:39 PM

To: Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: RE: Need details regarding [NotResp]

Hi Adam,

There are multiple instances of [NotResp] We expect [NotResp] guarantees for the uniqueness across [NotResp]. We did go this route to see if there were duplicates.

So far the root cause has not been determined for the notices. In this particular instance we did see that the username were closely identical between the user1 and user2. There was a special character "-" at the end (and that was the only difference). We are also looking into the [NotResp] to see how it behaves and whether it has to be tweaked.

Thanks

Balaji M. Ramamoorthy

From: Willard, Adam (CMS/CTR) [mailto:Adam.Willard@cms.hhs.gov]

Sent: Wednesday, November 06, 2013 12:05 PM

To: Ramamoorthy, Balaji Manikandan (CGI Federal)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: RE: Need details regarding [NotResp]

Is [NotResp] just 1 instance or are there several instances in production? If there are multiple systems generating a [NotResp] there could be collisions.

What was the analysis from the Users who said they saw someone's Notice instead of theirs. Was there any check to see if the [NotResp] for that user and the other user was the same?

Adam Willard (Contractor)
703-354-2229 x513 (Direct)
410-218-7352 (Mobile)
Adam.Willard@cms.hhs.gov

CMS [NotResp] Security Team
Consumer Information & Insurance Systems Group (CIISG)
Centers for Medicare & Medicaid Services (CMS)

[NotResp]

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [balajimanikandan.ramamoorthy@cgifederal.com]

Sent: Wednesday, November 06, 2013 11:47 AM

To: Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: RE: Need details regarding [NotResp]

Hi Adam,

The eligibility notices are stored in [NotResp] and the URI's for the notices are stored against the user record in [NotResp]

The [NotResp] for the PDF document itself is generated by [NotResp] and it is sufficiently random.

We did identify this issue internally and it is in the list of high priority items to be fixed. I will track down on the ETA for the fix and let you know.

I agree that in the meantime to see if the rate control can be applied to this specific URL.

Thanks

Balaji M. Ramamoorthy

From: Willard, Adam (CMS/CTR) [mailto:Adam.Willard@cms.hhs.gov]

Sent: Wednesday, November 06, 2013 9:37 AM

To: Ramamoorthy, Balaji Manikandan (CGI Federal)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal)

Subject: Need details regarding [NotResp]

Importance: High

Balaji,

I noticed this morning that it is possible for anyone to run a [NotResp] healthcare.gov to obtain the results of their eligibility.

I need to know where you are grabbing the file from [NotResp] or something else). Is that system publicly accessible?

We need to know if there is anyway to put in permission checking of the workspace url [NotResp] against the list of possible GUIDs for a user.

I sent Shima ([NotResp]) my eligibility URL and she was able to see my results in PDF format.

We are looking into a Rate Control for the [NotResp] to block or limit access to this screen if several attempts are made over X period of time.

Adam Willard (Contractor)
703-354-2229 x513 (Direct)
410-218-7352 (Mobile)
Adam.Willard@cms.hhs.gov

[NotResp]
CMS_esp_Security Team
Consumer Information & Insurance Systems Group (CIISG)
Centers for Medicare & Medicaid Services (CMS)

[NotResp]

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
 [NotResp]
 on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 12/5/2013 4:30:03 PM
To: Fryer, Teresa M. (CMS/OIS) [NotResp]
 [NotResp] Ambrosini, Ellen M. (CMS/OEM) [NotResp]
 [NotResp]; Alexander, David (CMS/OIS) [NotResp]
 [NotResp]
CC: Reinhold, Leslie A. (CMS/OEM) [NotResp]
 [NotResp] Wills, Theodora (CMS/OEM) [NotResp]
 [NotResp]
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

I don't know what 25244 so I have no comment on it.

[NotResp] # 24913, [NotResp] # INC000002589982 (see below for status)
 Next milestone is to have obtain an update on 12/9.

Issue:

An authenticated user can craft [NotResp] against the URL that provides the EligibilityNotice.pdf. If the [NotResp] on the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into HealthCare.gov, a user could script a [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp] All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

From: Fryer, Teresa M. (CMS/OIS)
Sent: Wednesday, December 04, 2013 7:40 PM
To: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)
Cc: Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)
Subject: Re: HHS Request: IT Response Plans for 2 Tickets

Tom,

This is yours for action. Please copy David on your responses.

Teresa

From: Ambrosini, Ellen M. (CMS/OEM)
Sent: Wednesday, December 04, 2013 06:57 PM
To: Fryer, Teresa M. (CMS/OIS); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)
Cc: Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)
Subject: HHS Request: IT Response Plans for 2 Tickets

Good evening, Teresa-

We met with HHS today and they are requesting several HHS Response Plans on several tickets. Therefore, please complete a Response Plan (template attached) for the below two IT tickets from the Marketplace:

- **NotResp** # 24913, **NotResp** # INC000002589982 (see below for status)
- **NotResp** # 25244, N/A **NotResp** ticket as this was entered by CMS IRT.

We will be preparing a Response Plan for several tickets covering an issue regarding potential PII violations and will ask you to review / input the IT section, as necessary.

All of these plans are due to the Department before COB on Friday, December 6th. We asked for an extension today and was told that the information is required on Friday.

Please let me know if you have any questions.

Thank you,

Ellen M. Ambrosini
Acting Director, Division of Privacy Policy
Privacy Policy Compliance Group, Office of E-Health Standards & Services
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244
410-786-6918



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Tuesday, December 03, 2013 1:02 PM
To: Reinhold, Leslie A. (CMS/OEM)
Subject: Fw: INC000002589982

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]
Sent: Tuesday, December 03, 2013 12:31 PM
To: Schankweiler, Thomas W. (CMS/OIS); Warren, Kevin (CMS/OIS); Lyles, Darrin V. (CMS/OIS); sbanks@foregroundsecurity.com <sbanks@foregroundsecurity.com>
Cc: FFM Security Defects <FFMSecurityDefects@cgifederal.com>; Martin, Rich (CGI Federal) <Rich.Martin@cgifederal.com>; Promisel, Andrew L (CGI Federal) <andy.promisel@cgifederal.com>; Alford, Justin (CGI Federal) <justin.alford@cgifederal.com>
Subject: INC000002589982

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] against the URL that provides the EligibilityNotice.pdf. If the [NotResp] in the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into HealthCare.gov, a user could script a [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp]. All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

Message

From: Schankweiler, Thomas W [NotResp]
[NotResp]
Sent: 12/3/2013 6:01:51 PM
To: Reinhold, Leslie A. (CMS/OEM) [NotResp]
[NotResp]
Subject: Fw: INC000002589982

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]
Sent: Tuesday, December 03, 2013 12:31 PM
To: Schankweiler, Thomas W. (CMS/OIS); Warren, Kevin (CMS/OIS); Lyles, Darrin V. (CMS/OIS); sbanks@foregroundsecurity.com <sbanks@foregroundsecurity.com>
Cc: FFM Security Defects <FFMSecurityDefects@cgifederal.com>; Martin, Rich (CGI Federal) <Rich.Martin@cgifederal.com>; Promisel, Andrew L (CGI Federal) <andy.promisel@cgifederal.com>; Alford, Justin (CGI Federal) <justin.alford@cgifederal.com>
Subject: INC000002589982

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] against the URL that provides the EligibilityNotice.pdf. If the [NotResp] on the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into HealthCare.gov, a user could script a [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp] All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.

2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 12/11/2013 7:05:43 PM
To: Fender, Rebecca (CMS/CCSQ) [NotResp]
Lyles, Darrin V. [NotResp]
[NotResp] Coutts, Todd (CMS/OIS) [NotResp]
[NotResp]
CC: Grothe, Kirk A. (CMS/OIS) [NotResp]
[NotResp] Outerbridge, Monique (CMS/OIS) [NotResp]
[NotResp] Coutts, Todd (CMS/OIS) [NotResp]
[NotResp]
Michael Finkel [mfinkel@qssinc.com]
Subject: RE: Response Needed: Reactivation of Notice Link

Thanks much

From: Fender, Rebecca (CMS/CCSQ)
Sent: Wednesday, December 11, 2013 2:04 PM
To: Schankweiler, Thomas W. (CMS/OIS); Lyles, Darrin V. (CMS/OIS); Coutts, Todd (CMS/OIS)
Cc: Grothe, Kirk A. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Coutts, Todd (CMS/OIS); Michael Finkel
Subject: RE: Response Needed: Reactivation of Notice Link

Tom,

Wanted to provide a brief status update. We are working on the concerns with the links. I should have a more thorough update by COB. I didn't want us to lose track of this issue.

Becky

Becky Fender PMP®
CMS
Cell 443-517-7037
Office 410-786-1006

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Wednesday, December 04, 2013 2:48 PM
To: Fender, Rebecca (CMS/CCSQ); Lyles, Darrin V. (CMS/OIS); Outerbridge, Monique (CMS/OIS)
Cc: Grothe, Kirk A. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Coutts, Todd (CMS/OIS); Michael Finkel
Subject: RE: Response Needed: Reactivation of Notice Link

Becca,

I cannot approve this at this time. ntil the [NotResp] fix is fully implemented and proven to be working. See the lingering issues that are listed below.

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] the URL that provides the EligibilityNotice.pdf. If the [NotResp] on the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into HealthCare.gov, a user could script [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp]. All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

From: Fender, Rebecca (CMS/CCSQ)

Sent: Wednesday, December 04, 2013 2:45 PM

To: Lyles, Darrin V. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique (CMS/OIS)

Subject: FW: Response Needed: Reactivation of Notice Link

Importance: High

Tom/Darrin we need approval on this ASAP.

Becky Fender PMP®

CMS

Cell NotResp

Office 410-786-1006

From: Walker, Benjamin L. (CMS/CCIIO)
Sent: Wednesday, December 04, 2013 2:43 PM
To: Fender, Rebecca (CMS/CCSQ)
Subject: Fw: Response Needed: Reactivation of Notice Link
Importance: High

From: McVeigh, Colin T. (CMS/CCIIO)
Sent: Tuesday, December 03, 2013 04:51 PM
To: Walker, Benjamin L. (CMS/CCIIO); Block, Lauren M. (CMS/CCIIO); Kane, Elizabeth M. (CMS/CCIIO); Camera, Ariella A. (CMS/CCIIO); Schankweiler, Thomas W. (CMS/OIS)
Subject: RE: Response Needed: Reactivation of Notice Link

Tom please see below. We need direction from security/privacy and are trying to move this as quickly as possible.

Thanks!

Colin McVeigh
Center for Consumer Information and Insurance Oversight
301.492.4263

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: McVeigh, Colin T. (CMS/CCIIO)
Sent: Tuesday, December 03, 2013 11:26 AM
To: Walker, Benjamin L. (CMS/CCIIO); Block, Lauren M. (CMS/CCIIO); Kane, Elizabeth M. (CMS/CCIIO); Camera, Ariella A. (CMS/CCIIO); Schankweiler, Thomas W. (CMS/OIS)
Subject: RE: Response Needed: Reactivation of Notice Link

Hi Tom,

There is a privacy/security issue detailed below which we'd like you to weigh in on. At this point, we think the best course of action is to reactive the notice link.

Thanks!

Colin McVeigh
Center for Consumer Information and Insurance Oversight
301.492.4263

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Walker, Benjamin L. (CMS/CCIIO)

Sent: Tuesday, December 03, 2013 10:29 AM

To: Mcveigh, Colin T. (CMS/CCIIO); Block, Lauren M. (CMS/CCIIO); Kane, Elizabeth M. (CMS/CCIIO); Camera, Ariella A. (CMS/CCIIO)

Subject: Re: Response Needed: Reactivation of Notice Link

I support re-activating it. I think Tom Schankweiler needs to weigh in.

From: Mcveigh, Colin T. (CMS/CCIIO)

Sent: Tuesday, December 03, 2013 10:17 AM

To: Block, Lauren M. (CMS/CCIIO); Walker, Benjamin L. (CMS/CCIIO); Kane, Elizabeth M. (CMS/CCIIO); Camera, Ariella A. (CMS/CCIIO)

Subject: Response Needed: Reactivation of Notice Link

Hi all,

More than a month ago we received reports that consumers were seeing other consumer's notices through a link on the application that should have taken them to their own determination notice. After receiving those reports, CGI decided to deactivate the problematic link.

Since then, a number of related fixes have been made although none directly addressing this particular notice issue. Additionally, CGI has never been able to recreate this issue in lower environments because of the way those environments are configured and how they are accessed internally. Our CGI development lead (Stephen Wass) believes that this issue is likely fixed at this point. However, since it was not something that could be reproduced here we cannot be sure. At this point, CGI needs CMS guidance regarding whether or not to reactivate the link.

Lauren, I'm not sure who has the authority to make this call but I was hoping you might be able to push it in the right direction. I've laid out some pros and cons regarding reactivating the link or keeping it inactive below.

Activating the Link

- Consumers can receive the link and their notice as designed.
- Developers believe it is likely resolved.
- Because we have not been able to reproduce the issue in lower environments, activating the link and then listening for 'noise' on this issue may be the most effective way to determine whether it is fixed or not.
- The issue may not be fixed and privacy risks may surface.

Keeping Link Inactive

- This would negate privacy risks above.
- Consumers would lose one avenue through which they can learn about their determination.
- Since this defect has not been reproducible on our end, it will be difficult to confirm whether or not the defect is actually fixed without actually activating the link in production.

If anyone else has any other information to add to this issue please feel free.

Thanks!

Colin McVeigh
Center for Consumer Information and Insurance Oversight
301.492.4263

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
 [NotResp]
 on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 12/5/2013 4:41:45 PM
To: Reinhold, Leslie A. (CMS/OEM) [NotResp]
 [NotResp] Fryer, Teresa M. (CMS/OIS) [NotResp]
CC: [NotResp]
 Ambrosini, Ellen M. (CMS/OEM) [NotResp]
 [NotResp] Alexander, David (CMS/OIS) [NotResp]
 [NotResp] Wills, Theodora (CMS/OEM) [NotResp]
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

The one for Balaji is no the 25244. If that the healthcare.data.gov then I has sent you the threads on that from OC and you were going to write it up.

From: Reinhold, Leslie A. (CMS/OEM)
Sent: Thursday, December 05, 2013 11:39 AM
To: Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)
Subject: Re: HHS Request: IT Response Plans for 2 Tickets

Tom it's on that printout we looked at on Tuesday it's the last 2, the [NotResp] that Balagi wrote up and data.gov. I know we discussed the data.gov one. Write up what the deal is with that if we are closing it let me know.

Thanks

On Dec 5, 2013, at 11:33 AM, "Fryer, Teresa M. (CMS/OIS)" <Teresa.Fryer@cms.hhs.gov> wrote:
 Ellen,

What is #25244, Tom has indicated he does not know what this is and you have indicated that both tickets are for Marketplace.

Teresa

From: Ambrosini, Ellen M. (CMS/OEM)
Sent: Wednesday, December 04, 2013 6:58 PM
To: Fryer, Teresa M. (CMS/OIS); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)
Cc: Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)
Subject: HHS Request: IT Response Plans for 2 Tickets
Importance: High

Good evening, Teresa-

We met with HHS today and they are requesting several HHS Response Plans on several tickets. Therefore, please complete a Response Plan (template attached) for the below two IT tickets from the Marketplace:

- [NotResp] # 24913 [NotResp] # INC000002589982 (see below for status)
- [NotResp] # 25244, N/A [NotResp] ticket as this was entered by CMS IRT.

We will be preparing a Response Plan for several tickets covering an issue regarding potential PII violations and will ask you to review / input the IT section, as necessary.

All of these plans are due to the Department before COB on Friday, December 6th. We asked for an extension today and was told that the information is required on Friday.

Please let me know if you have any questions.

Thank you,

Ellen M. Ambrosini

Acting Director, Division of Privacy Policy

Privacy Policy Compliance Group, Office of E-Health Standards & Services

Centers for Medicare & Medicaid Services

7500 Security Boulevard

Baltimore, Maryland 21244

410-786-6918

<image001.jpg>

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Schankweiler, Thomas W. (CMS/OIS)

Sent: Tuesday, December 03, 2013 1:02 PM

To: Reinhold, Leslie A. (CMS/OEM)

Subject: Fw: INC000002589982

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [<mailto:balajimanikandan.ramamoorthy@cgifederal.com>]

Sent: Tuesday, December 03, 2013 12:31 PM

To: Schankweiler, Thomas W. (CMS/OIS); Warren, Kevin (CMS/OIS); Lyles, Darrin V. (CMS/OIS); sbanks@foregroundsecurity.com <sbanks@foregroundsecurity.com>

Cc: FFM Security Defects <FFMSecurityDefects@cgifederal.com>; Martin, Rich (CGI Federal)

<Rich.Martin@cgifederal.com>; Promisel, Andrew L (CGI Federal) <andy.promisel@cgifederal.com>; Alford, Justin (CGI Federal) <justin.alford@cgifederal.com>

Subject: INC000002589982

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] against the URL that provides the EligibilityNotice.pdf. If the [NotResp] on the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into [HealthCare.gov](https://www.healthcare.gov), a user could script [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp]. All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 12/9/2013 7:27:47 PM
To: Alexander, David (CMS/OIS) [NotResp]
Subject: FW: HHS Request: IT Response Plans for 2 Tickets

David,

Here you go, do you need something further to complete the HHS form?

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Thursday, December 05, 2013 12:33 PM
To: Reinhold, Leslie A. (CMS/OEM); Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Wills, Theodora (CMS/OEM)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

All,

Here is the write up to close out 25244 in [NotResp]

Data.healthcare.gov

11/19 - Socrata investigated their platform for any signs of malicious activity. First, the activity referred to is the public user profile search API which doesn't reveal any private user information that could be exploited. Second, there is no connection or integration between Socrata platform user accounts and healthcare.gov user accounts. They are completely separate. Third, Socrate has been monitoring and there are no indications of any malicious activity targeting the Socrata platform or data.healthcare.gov.

Please close this as a False Positive -99

Thanks,

Tom

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Thursday, December 05, 2013 11:42 AM
To: Reinhold, Leslie A. (CMS/OEM); Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Wills, Theodora (CMS/OEM)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

The one for Balaji is no the 25244. If that the healthcare.data.gov then I has sent you the threads on that from OC and you were going to write it up.

From: Reinhold, Leslie A. (CMS/OEM)

Sent: Thursday, December 05, 2013 11:39 AM

To: Fryer, Teresa M. (CMS/OIS)

Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)

Subject: Re: HHS Request: IT Response Plans for 2 Tickets

Tom it's on that printout we looked at on Tuesday it's the last 2, [NotResp] that Balagi wrote up and data.gov. I know we discussed the data.gov one. Write up what the deal is with that if we are closing it let me know.

Thanks

On Dec 5, 2013, at 11:33 AM, "Fryer, Teresa M. (CMS/OIS)" <Teresa.Fryer@cms.hhs.gov> wrote:
Ellen,

What is #25244, Tom has indicated he does not know what this is and you have indicated that both tickets are for Marketplace.

Teresa

From: Ambrosini, Ellen M. (CMS/OEM)

Sent: Wednesday, December 04, 2013 6:58 PM

To: Fryer, Teresa M. (CMS/OIS); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)

Cc: Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)

Subject: HHS Request: IT Response Plans for 2 Tickets

Importance: High

Good evening, Teresa-

We met with HHS today and they are requesting several HHS Response Plans on several tickets. Therefore, please complete a Response Plan (template attached) for the below two IT tickets from the Marketplace:

- [NotResp] # 24913, [NotResp] # INC000002589982 (see below for status)
- [NotResp] # 25244, N/A [NotResp] ticket as this was entered by CMS IRT.

We will be preparing a Response Plan for several tickets covering an issue regarding potential PII violations and will ask you to review / input the IT section, as necessary.

All of these plans are due to the Department before COB on Friday, December 6th. We asked for an extension today and was told that the information is required on Friday.

Please let me know if you have any questions.

Thank you,

Ellen M. Ambrosini
Acting Director, Division of Privacy Policy

Privacy Policy Compliance Group, Office of E-Health Standards & Services
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244
410-786-6918

<image001.jpg>

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Tuesday, December 03, 2013 1:02 PM
To: Reinhold, Leslie A. (CMS/OEM)
Subject: Fw: INC000002589982

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]
Sent: Tuesday, December 03, 2013 12:31 PM
To: Schankweiler, Thomas W. (CMS/OIS); Warren, Kevin (CMS/OIS); Lyles, Darrin V. (CMS/OIS); sbanks@foregroundsecurity.com <sbanks@foregroundsecurity.com>
Cc: FFM Security Defects <FFMSecurityDefects@cgifederal.com>; Martin, Rich (CGI Federal) <Rich.Martin@cgifederal.com>; Promisel, Andrew L (CGI Federal) <andy.promisel@cgifederal.com>; Alford, Justin (CGI Federal) <justin.alford@cgifederal.com>
Subject: INC000002589982

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] the URL that provides the EligibilityNotice.pdf. If the [NotResp] on the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into HealthCare.gov, a user could script a [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp]. All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] or all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
 [NotResp]
 on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 12/5/2013 4:36:50 PM
To: Fryer, Teresa M. (CMS/OIS) [NotResp]
 [NotResp] Ambrosini, Ellen M. (CMS/OEM) [NotResp]
 [NotResp] Alexander, David (CMS/OIS) [NotResp]
CC: Reinhold, Leslie A. (CMS/OEM) [NotResp]
 [NotResp] Wills, Theodora (CMS/OEM) [NotResp]
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

Ellen,

Last I had from Leslie on this is she was going to work with HHS to get more details as it is listed on a spreadsheet that she sent me as an "IT Flaw was reported in healthcare.gov. This flaw (if exploited) allows anyone to access and edit records in the health care system. " Other than that title, I have not information in what it is in reference too.

Tom

From: Fryer, Teresa M. (CMS/OIS)
Sent: Thursday, December 05, 2013 11:34 AM
To: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)
Cc: Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

Ellen,

What is #25244, Tom has indicated he does not know what this is and you have indicated that both tickets are for Marketplace.

Teresa

From: Ambrosini, Ellen M. (CMS/OEM)
Sent: Wednesday, December 04, 2013 6:58 PM
To: Fryer, Teresa M. (CMS/OIS); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)
Cc: Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)
Subject: HHS Request: IT Response Plans for 2 Tickets
Importance: High

Good evening, Teresa-

We met with HHS today and they are requesting several HHS Response Plans on several tickets. Therefore, please complete a Response Plan (template attached) for the below two IT tickets from the Marketplace:

- [NotResp] # 24914 [NotResp] # INC000002589982 (see below for status)

- [NotResp] 25244, N/A [NotResp] ticket as this was entered by CMS IRT.

We will be preparing a Response Plan for several tickets covering an issue regarding potential PII violations and will ask you to review / input the IT section, as necessary.

All of these plans are due to the Department before COB on Friday, December 6th. We asked for an extension today and was told that the information is required on Friday.

Please let me know if you have any questions.

Thank you,

Ellen M. Ambrosini

Acting Director, Division of Privacy Policy

Privacy Policy Compliance Group, Office of E-Health Standards & Services

Centers for Medicare & Medicaid Services

7500 Security Boulevard

Baltimore, Maryland 21244

410-786-6918



INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Schankweiler, Thomas W. (CMS/OIS)

Sent: Tuesday, December 03, 2013 1:02 PM

To: Reinhold, Leslie A. (CMS/OEM)

Subject: Fw: INC000002589982

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [<mailto:balajimanikandan.ramamoorthy@cgifederal.com>]

Sent: Tuesday, December 03, 2013 12:31 PM

To: Schankweiler, Thomas W. (CMS/OIS); Warren, Kevin (CMS/OIS); Lyles, Darrin V. (CMS/OIS); sbanks@foregroundsecurity.com <sbanks@foregroundsecurity.com>

Cc: FFM Security Defects <FFMSecurityDefects@cgifederal.com>; Martin, Rich (CGI Federal)

<Rich.Martin@cgifederal.com>; Promisel, Andrew L (CGI Federal) <andy.promisel@cgifederal.com>; Alford, Justin (CGI Federal) <justin.alford@cgifederal.com>

Subject: INC000002589982

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] the URL that provides the EligibilityNotice.pdf. If the [NotResp] on the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into HealthCare.gov, a user could script a [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp] All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
 on behalf of [NotResp]
 Schankweiler, Thomas W. (CMS/OIS)
Sent: 12/4/2013 7:48:12 PM
To: Fender, Rebecca (CMS/CCSQ) [NotResp]
 Lyles, Darrin V. (CMS/OIS) [NotResp]
 [NotResp] Outerbridge, Monique (CMS/OIS) [NotResp]
CC: Grothe, Kirk A. (CMS/OIS) [NotResp]
 [NotResp] Outerbridge, Monique (CMS/OIS) [NotResp]
 [NotResp] Coutts, Todd (CMS/OIS) [NotResp]
 [NotResp]
Subject: RE: Response Needed: Reactivation of Notice Link

Becca,

I cannot approve this at this time. until the [NotResp] fix is fully implemented and proven to be working. See the lingering issues that are listed below.

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] the URL that provides the EligibilityNotice.pdf. If the [NotResp] in the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into HealthCare.gov, a user could script a [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp]. All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

From: Fender, Rebecca (CMS/CCSQ)

Sent: Wednesday, December 04, 2013 2:45 PM

To: Lyles, Darrin V. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique (CMS/OIS)

Subject: FW: Response Needed: Reactivation of Notice Link

Importance: High

Tom/Darrin we need approval on this ASAP.

Becky Fender PMP®

CMS

Cell [b)(6)]

Office 410-786-1006

From: Walker, Benjamin L. (CMS/CCIIO)

Sent: Wednesday, December 04, 2013 2:43 PM

To: Fender, Rebecca (CMS/CCSQ)

Subject: Fw: Response Needed: Reactivation of Notice Link

Importance: High

From: Mcveigh, Colin T. (CMS/CCIIO)

Sent: Tuesday, December 03, 2013 04:51 PM

To: Walker, Benjamin L. (CMS/CCIIO); Block, Lauren M. (CMS/CCIIO); Kane, Elizabeth M. (CMS/CCIIO); Camera, Ariella A. (CMS/CCIIO); Schankweiler, Thomas W. (CMS/OIS)

Subject: RE: Response Needed: Reactivation of Notice Link

Tom please see below. We need direction from security/privacy and are trying to move this as quickly as possible.

Thanks!

Colin McVeigh
Center for Consumer Information and Insurance Oversight
301.492.4263

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Mcveigh, Colin T. (CMS/CCIIO)
Sent: Tuesday, December 03, 2013 11:26 AM
To: Walker, Benjamin L. (CMS/CCIIO); Block, Lauren M. (CMS/CCIIO); Kane, Elizabeth M. (CMS/CCIIO); Camera, Ariella A. (CMS/CCIIO); Schankweiler, Thomas W. (CMS/OIS)
Subject: RE: Response Needed: Reactivation of Notice Link

Hi Tom,

There is a privacy/security issue detailed below which we'd like you to weigh in on. At this point, we think the best course of action is to reactive the notice link.

Thanks!

Colin McVeigh
Center for Consumer Information and Insurance Oversight
301.492.4263

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Walker, Benjamin L. (CMS/CCIIO)
Sent: Tuesday, December 03, 2013 10:29 AM
To: Mcveigh, Colin T. (CMS/CCIIO); Block, Lauren M. (CMS/CCIIO); Kane, Elizabeth M. (CMS/CCIIO); Camera, Ariella A. (CMS/CCIIO)
Subject: Re: Response Needed: Reactivation of Notice Link

I support re-activating it. I think Tom Schankweiler needs to weigh in.

From: Mcveigh, Colin T. (CMS/CCIIO)
Sent: Tuesday, December 03, 2013 10:17 AM
To: Block, Lauren M. (CMS/CCIIO); Walker, Benjamin L. (CMS/CCIIO); Kane, Elizabeth M. (CMS/CCIIO); Camera, Ariella A. (CMS/CCIIO)
Subject: Response Needed: Reactivation of Notice Link

Hi all,

More than a month ago we received reports that consumers were seeing other consumer's notices through a link on the application that should have taken them to their own determination notice. After receiving those reports, CGI decided to deactivate the problematic link.

Since then, a number of related fixes have been made although none directly addressing this particular notice issue. Additionally, CGI has never been able to recreate this issue in lower environments because of the way those environments are configured and how they are accessed internally. Our CGI development lead (Stephen Wass) believes that this issue is likely fixed at this point. However, since it was not something that could be reproduced here we cannot be sure. At this point, CGI needs CMS guidance regarding whether or not to reactivate the link.

Lauren, I'm not sure who has the authority to make this call but I was hoping you might be able to push it in the right direction. I've laid out some pros and cons regarding reactivating the link or keeping it inactive below.

Activating the Link

- Consumers can receive the link and their notice as designed.
- Developers believe it is likely resolved.
- Because we have not been able to reproduce the issue in lower environments, activating the link and then listening for 'noise' on this issue may be the most effective way to determine whether it is fixed or not.
- The issue may not be fixed and privacy risks may surface.

Keeping Link Inactive

- This would negate privacy risks above.
- Consumers would lose one avenue through which they can learn about their determination.
- Since this defect has not been reproducible on our end, it will be difficult to confirm whether or not the defect is actually fixed without actually activating the link in production.

If anyone else has any other information to add to this issue please feel free.

Thanks!

Colin McVeigh
Center for Consumer Information and Insurance Oversight
301.492.4263

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 12/9/2013 7:52:04 PM
To: Alexander, David (CMS/OIS) [NotResp]
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

They don't want to take any ownership in this process and it is getting a bit annoying. Of course I also sat in Ellen's office last week for an hour with Leslie and they both agreed that Leslie would do this. Now they are reversing course. Not cool.

Tom

From: Alexander, David (CMS/OIS)
Sent: Monday, December 09, 2013 2:37 PM
To: Schankweiler, Thomas W. (CMS/OIS)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

Thanks, I didn't think there was more beyond what you sent previously. I see the other thread going... I'm hoping Privacy will be able to push back on HHS before I have to escalate up through Teresa.

Thanks

David Alexander, CISSP

410-786-3001

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Monday, December 09, 2013 2:28 PM
To: Alexander, David (CMS/OIS)
Subject: FW: HHS Request: IT Response Plans for 2 Tickets

David,

Here you go, do you need something further to complete the HHS form?

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Thursday, December 05, 2013 12:33 PM
To: Reinhold, Leslie A. (CMS/OEM); Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Wills, Theodora (CMS/OEM)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

All,

Here is the write up to close out 25244 in [NotResp]

Data.healthcare.gov

11/19 - Socrata investigated their platform for any signs of malicious activity. First, the activity referred to is the public user profile search API which doesn't reveal any private user information that could be exploited. Second, there is no connection or integration between Socrata platform user accounts and healthcare.gov user accounts. They are completely separate. Third, Socrate has been monitoring and there are no indications of any malicious activity targeting the Socrata platform or data.healthcare.gov.

Please close this as a False Positive -99

Thanks,

Tom

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Thursday, December 05, 2013 11:42 AM
To: Reinhold, Leslie A. (CMS/OEM); Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Wills, Theodora (CMS/OEM)
Subject: RE: HHS Request: IT Response Plans for 2 Tickets

The one for Balaji is no the 25244. If that the healthcare.data.gov then I has sent you the threads on that from OC and you were going to write it up.

From: Reinhold, Leslie A. (CMS/OEM)
Sent: Thursday, December 05, 2013 11:39 AM
To: Fryer, Teresa M. (CMS/OIS)
Cc: Ambrosini, Ellen M. (CMS/OEM); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)
Subject: Re: HHS Request: IT Response Plans for 2 Tickets

Tom it's on that printout we looked at on Tuesday it's the last 2, the NotResp that Balagi wrote up and data.gov. I know we discussed the data.gov one. Write up what the deal is with that if we are closing it let me know.

Thanks

On Dec 5, 2013, at 11:33 AM, "Fryer, Teresa M. (CMS/OIS)" <Teresa.Fryer@cms.hhs.gov> wrote:
Ellen,

What is #25244, Tom has indicated he does not know what this is and you have indicated that both tickets are for Marketplace.

Teresa

From: Ambrosini, Ellen M. (CMS/OEM)
Sent: Wednesday, December 04, 2013 6:58 PM
To: Fryer, Teresa M. (CMS/OIS); Alexander, David (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)

Cc: Reinhold, Leslie A. (CMS/OEM); Wills, Theodora (CMS/OEM)

Subject: HHS Request: IT Response Plans for 2 Tickets

Importance: High

Good evening, Teresa-

We met with HHS today and they are requesting several HHS Response Plans on several tickets. Therefore, please complete a Response Plan (template attached) for the below two IT tickets from the Marketplace:

- [NotResp] # 24913, [NotResp] # INC000002589982 (see below for status)
- [NotResp] # 25244, N/A [NotResp] ticket as this was entered by CMS IRT.

We will be preparing a Response Plan for several tickets covering an issue regarding potential PII violations and will ask you to review / input the IT section, as necessary.

All of these plans are due to the Department before COB on Friday, December 6th. We asked for an extension today and was told that the information is required on Friday.

Please let me know if you have any questions.

Thank you,

Ellen M. Ambrosini

Acting Director, Division of Privacy Policy

Privacy Policy Compliance Group, Office of E-Health Standards & Services

Centers for Medicare & Medicaid Services

7500 Security Boulevard

Baltimore, Maryland 21244

410-786-6918

<image001.jpg>

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Schankweiler, Thomas W. (CMS/OIS)

Sent: Tuesday, December 03, 2013 1:02 PM

To: Reinhold, Leslie A. (CMS/OEM)

Subject: Fw: INC000002589982

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]

Sent: Tuesday, December 03, 2013 12:31 PM

To: Schankweiler, Thomas W. (CMS/OIS); Warren, Kevin (CMS/OIS); Lyles, Darrin V. (CMS/OIS); sbanks@foregroundsecurity.com <sbanks@foregroundsecurity.com>

Cc: FFM Security Defects <FFMSecurityDefects@cgifederal.com>; Martin, Rich (CGI Federal)

<Rich.Martin@cgifederal.com>; Promisel, Andrew L (CGI Federal) <andy.promisel@cgifederal.com>; Alford, Justin (CGI Federal) <justin.alford@cgifederal.com>

Subject: INC000002589982

Hi Tom,

As discussed here is the write up for the incident # INC000002589982. Please forward it as necessary.

Issue:

An authenticated user can craft a [NotResp] the URL that provides the EligibilityNotice.pdf. If the [NotResp] on the system is not truly Unique, this could pose a risk of disclosure to users. Once logged into HealthCare.gov, a user could script a [NotResp] the system to retrieve any user's eligibility form.

Analysis:

A Proof of Concept was performed by the Marketplace Security Team where user A provided a URL to user B. User B was able to see the EligibilityNotice.pdf for User A.

Resolution:

FFM security team have put a code fix in place that will check the meta data of the notices stored in [NotResp] and make sure that it is associated with the user who is logged in before it could be downloaded by the user. The meta data for the notice includes the [NotResp] and the username. The fix accounts for different roles such as

1. Consumers
2. Agents/Brokers
3. CCR's
4. ESD workers.

The fix has been successfully tested in the lower environments for all these roles and the code has been promoted to the production. The enforcement has not been turned on in production due to the following reasons.

1. Currently the meta data is not populated for the notices stored in [NotResp] All the existing notices have to be updated for the meta data by the data cleanup team. This involves checking the [NotResp] for all notices, obtaining the [NotResp] and username and populating [NotResp] with proper meta data.
2. The development team has to update the code to make sure that any new notice generation is populating the proper meta data going forward.

Action Items

We don't have an ETA for these 2 tasks listed above and when the enforcement can be turned on. I have copied Justin Alford (who leads the data cleanup team) and Andy Promisel (who leads the development efforts) in the email as well.

Please let me know if you need more information.

Thanks

Balaji M. Ramamoorthy

This space intentionally left blank.

Message

From: Schankweiler, Thomas W. (CMS/OIS); NotResp
NotResp
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 11/3/2013 9:15:40 PM
To: CMS - Marketplace Security Team; NotResp
NotResp
CC: Reinhold, Leslie A. (CMS/OEM); NotResp
NotResp; Wills, Theodora (CMS/OEM); NotResp
NotResp; Elky, Mark (CMS/OIS); NotResp
NotResp; Marantan, James
Subject: FW: question from CNN about Heritage report

To the analyst on duty.

Please open a ticket with the information listed below, populate it as a CAT-1 with PII implications. If you follow the article you will see which citizen reported the incident. Once completed be sure it goes to the CMS IT service desk.

Thanks,

Tom

From: Outerbridge, Monique (CMS/OIS)
Sent: Sunday, November 03, 2013 3:50 PM
To: Nelson, David J. (CMS/OEM); Bradley, Tasha (CMS/OC); Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); 'greg.gershman.health@gmail.com'
Cc: Unruh, Patti (CMS/OC)
Subject: RE: question from CNN about Heritage report

CGI just informed us of this problem this afternoon. They are working on a fix now and could be deployed to production in 2 hours. Will keep you posted

From: Bradley, Tasha (CMS/OC)
Sent: Sunday, November 03, 2013 3:02 PM
To: Nelson, David J. (CMS/OEM); Outerbridge, Monique (CMS/OIS); Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); 'greg.gershman.health@gmail.com'
Cc: Unruh, Patti (CMS/OC)
Subject: Fw: question from CNN about Heritage report

Hi all- sorry for the Sunday afternoon email. CNN is working on a story based on a Heritage report that a user received another user's eligibility determination.

Is this possible?

If this does happen, what is the procedure to address this?

Are there security measures in place to handle a situation like this?

Is the team aware of any instances that this has occurred?

<http://blog.heritage.org/2013/11/02/exclusive-healthcare-gov-users-warn-of-security-risk-breach-of-privacy/>

From: Bataille, Julie (CMS/OC)

Sent: Sunday, November 03, 2013 02:22 PM

To: Bradley, Tasha (CMS/OC)

Subject: Fw: question from CNN about Heritage report

Can u pls take

From: Wallace, Gregory [<mailto:gregory.wallace@turner.com>]

Sent: Sunday, November 03, 2013 02:16 PM

To: Bataille, Julie (CMS/OC); Cook, Brian T. (CMS/OC)

Subject: question from CNN about Heritage report

Good afternoon,

Checking in for your comment on this Heritage post that a user's information was presented to a different user on HealthCare.gov.

Is this an issue CMS teams are aware of and working on, and are there other instances of this happening?

<http://blog.heritage.org/2013/11/02/exclusive-healthcare-gov-users-warn-of-security-risk-breach-of-privacy/>

Thank you,

Greg Wallace

CNN

202-738-3113

Message

From: Schankweiler, Thomas W. (CMS/OIS); [Redacted] NotResp
 [Redacted] NotResp
 on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 11/3/2013 9:10:53 PM
To: Outerbridge, Monique (CMS/OIS); [Redacted] NotResp
 [Redacted] NotResp; Nelson, David J. (CMS/OEM); [Redacted] NotResp
 [Redacted] NotResp; Bradley, Tasha (CMS/OC); [Redacted] NotResp
 [Redacted] NotResp; [Redacted] NotResp
 [Redacted] NotResp; Oh, Mark U.
 [Redacted] NotResp
 'greg.gershman.health@gmail.com' [greg.gershman.health@gmail.com]
CC: Unruh, Patti (CMS/OC); [Redacted] NotResp
Subject: RE: question from CNN about Heritage report

I'll have the Security Marketplace Team open a ticket on this as a PII Category-1 incident. I'll need to know if CGI can determine if anyone else has letters posted in their accounts that are not theirs? Do we have a root cause on why this happened. Was there any other exposure.

I am still waiting on someone from CGI to get back with me regarding the final analysis on the PII exposure to [Redacted] NotResp on the other CNN article. Balaji I think had the lead on that.

Tom

From: Outerbridge, Monique (CMS/OIS)
Sent: Sunday, November 03, 2013 3:57 PM
To: Schankweiler, Thomas W. (CMS/OIS); Nelson, David J. (CMS/OEM); Bradley, Tasha (CMS/OC); Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); 'greg.gershman.health@gmail.com'
Cc: Unruh, Patti (CMS/OC)
Subject: RE: question from CNN about Heritage report

They were but they are proposing an interim fix until a permanent one can be provided. I just advised Kirk it should be reported as an incident.

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Sunday, November 03, 2013 3:51 PM
To: Outerbridge, Monique (CMS/OIS); Nelson, David J. (CMS/OEM); Bradley, Tasha (CMS/OC); Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); 'greg.gershman.health@gmail.com'
Cc: Unruh, Patti (CMS/OC)
Subject: RE: question from CNN about Heritage report

I read this e-mail just within the last hour. I need to read the new article. Was CGI able to duplicate this problem? I am assuming so since they are putting a fix in place.

Tom

From: Outerbridge, Monique (CMS/OIS)
Sent: Sunday, November 03, 2013 3:50 PM

To: Nelson, David J. (CMS/OEM); Bradley, Tasha (CMS/OC); Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); 'greg.gershman.health@gmail.com'

Cc: Unruh, Patti (CMS/OC)

Subject: RE: question from CNN about Heritage report

CGI just informed us of this problem this afternoon. They are working on a fix now and could be deployed to production in 2 hours. Will keep you posted.

From: Nelson, David J. (CMS/OEM)

Sent: Sunday, November 03, 2013 3:48 PM

To: Bradley, Tasha (CMS/OC); Outerbridge, Monique (CMS/OIS); Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); 'greg.gershman.health@gmail.com'

Cc: Unruh, Patti (CMS/OC)

Subject: RE: question from CNN about Heritage report

I am just hearing about this following your note. I am hoping Tom is in the loop.

From: Bradley, Tasha (CMS/OC)

Sent: Sunday, November 03, 2013 3:02 PM

To: Nelson, David J. (CMS/OEM); Outerbridge, Monique (CMS/OIS); Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); 'greg.gershman.health@gmail.com'

Cc: Unruh, Patti (CMS/OC)

Subject: Fw: question from CNN about Heritage report

Hi all- sorry for the Sunday afternoon email. CNN is working on a story based on a Heritage report that a user received another user's eligibility determination.

Is this possible?

If this does happen, what is the procedure to address this?

Are there security measures in place to handle a situation like this?

Is the team aware of any instances that this has occurred?

<http://blog.heritage.org/2013/11/02/exclusive-healthcare-gov-users-warn-of-security-risk-breach-of-privacy/>

From: Bataille, Julie (CMS/OC)

Sent: Sunday, November 03, 2013 02:22 PM

To: Bradley, Tasha (CMS/OC)

Subject: Fw: question from CNN about Heritage report

Can u pls take

From: Wallace, Gregory [<mailto:gregory.wallace@turner.com>]

Sent: Sunday, November 03, 2013 02:16 PM

To: Bataille, Julie (CMS/OC); Cook, Brian T. (CMS/OC)

Subject: question from CNN about Heritage report

Good afternoon,

Checking in for your comment on this Heritage post that a user's information was presented to a different user on HealthCare.gov.

Is this an issue CMS teams are aware of and working on, and are there other instances of this happening?

<http://blog.heritage.org/2013/11/02/exclusive-healthcare-gov-users-warn-of-security-risk-breach-of-privacy/>

Thank you,

Greg Wallace
CNN
202-738-3113

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 10/31/2013 12:43:31 AM
To: Stevenson, Corey B. (CMS/OIS) [NotResp]
[NotResp] Charest, Kevin (OS/ASA/OCIO/OIS) [NotResp]
[NotResp]
CC: Chao, Henry (CMS/OIS) [NotResp] Fryer, Teresa
M. (CMS/OIS) [NotResp]
[NotResp] Outerbridge, Monique (CMS/OIS) [NotResp]
[NotResp] Carter, Daniel (CMS/OC)
[NotResp] Newton, Paul (CMS/OIS) [NotResp]
[NotResp]
Subject: RE: [NotResp] closed

I put Kevin in touch with Mike Smith from Akamai, so hopefully they can talk tomorrow.

Tom

From: Stevenson, Corey B. (CMS/OIS)
Sent: Wednesday, October 30, 2013 8:31 PM
To: Charest, Kevin (OS/ASA/OCIO/OIS); Schankweiler, Thomas W. (CMS/OIS)
Cc: Chao, Henry (CMS/OIS); Fryer, Teresa M. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Carter, Daniel (CMS/OC);
Newton, Paul (CMS/OIS)
Subject: Re: [NotResp] closed

Kevin,

Akamai can arrange for someone that has clearance on their security team to talk to whomever if that is what would be required, they are just desperately trying to determine the risk/impact on their systems right now since they signed the keys. Please advise

Corey B. Stevenson
Director
Enterprise Data Center Group (EDCG)
Office of Information Services (OIS)
Centers for Medicare & Medicaid Services (CMS)
-----Blackberry impaired typing.

From: Charest, Kevin (OS/ASA/OCIO/OIS)
Sent: Wednesday, October 30, 2013 07:48 PM
To: Schankweiler, Thomas W. (CMS/OIS)
Cc: Chao, Henry (CMS/OIS); Fryer, Teresa M. (CMS/OIS); Stevenson, Corey B. (CMS/OIS); Outerbridge, Monique (CMS/OIS)
Subject: Re: [NotResp] closed

Thanks Tom. We will send you the ticket tomorrow.

Kevin

Sent from my iPad

On Oct 30, 2013, at 6:36 PM, "Schankweiler, Thomas W. (CMS/OIS)" <thomas.schankweiler@cms.hhs.gov> wrote:
Kevin,

NotResp

for the following sites have been changed and will be propagated at midnight tonight.

1. cms.gov
2. cms.hhs.gov
3. cuidadodesalud.gov
4. healthcare.gov
5. insurekidsnow.gov
6. medicaide.gov
7. medicare.gov
8. mimedicare.gov
9. mymedicare.gov

If you have any questions feel free to contact me. Also could you please send me the incident tracking number for this event.

Thanks,

Tom Schankweiler, CISSP
Information Security Officer, CCIO
CMS\OIS\CIISG
Consumer Information and Insurance Systems Group
410-786-5956 (Balt. Office, N2-13-22)
301-875-1536 (Mobile)

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]
Sent: 11/1/2013 12:56:32 AM
To: Unruh, Patti (CMS/OC) [NotResp]
Lyles, Darrin V. (CMS/OIS) [NotResp]
[NotResp]
CC: Outerbridge, Monique (CMS/OIS) [NotResp]
[NotResp] Grothe, Kirk (HHS/OCIIO) [NotResp]
[NotResp]
Subject: RE: CNN request: Healthcare.gov sending your info to 3rd parties

Patti,

Sorry for the delay in answering this one... hope I am not too late.

CMS has reviewed the report by Mr. Simo and we are actively researching to determine if any individual data may have been exposed. As noted in the CNN article, the data was encrypted so the risk is low that a compromise has occurred. CMS has contacted [NotResp] and several adjustments have been made to fully resolve the security risk identified. CMS is committed to safeguarding the privacy and security of all individuals and we are responding to all legitimate risks identified by any security professional or vendor that reports a security bug.

Tom

From: Unruh, Patti (CMS/OC)
Sent: Thursday, October 31, 2013 3:35 PM
To: Schankweiler, Thomas W. (CMS/OIS); Lyles, Darrin V. (CMS/OIS)
Subject: FW: CNN request: Healthcare.gov sending your info to 3rd parties

Hi...sorry I'm back. CNN and The Verge are asking us abt this...Here's an excerpt from The Verge...and CNN's similar request is at the bottom...I tried reading our privacy policy but wasn't sure I could address the charges here...do you have time to talk today?

<http://www.theverge.com/2013/10/31/5047932/healthcare-gov-transferring-private-user-information-third-parties> Security researcher Ben Simo noticed that Healthcare.gov was sending his user name and password reset code to third party partners including the analytics services Pingdom, DoubleClick, and Google Analytics. The risk to users is low since the information is encrypted as it is sent, and those partners are all reputable companies. However, the oversight may constitute a violation of the site's own privacy policy, which says, "No personally identifiable information is collected by these tools." Facebook and Myspace were fined by the Federal Trade Commission (FTC) for similar infractions last year. "WE DON'T WANT AND DON'T USE THIS TYPE OF DATA." What's more, there is no need to send user names or password reset codes to third parties. "We don't want and don't use this type of data," a representative for Google, which owns DoubleClick and Google Analytics, says in an email to *The Verge*. "Thanks for raising this — we're looking into it."

From: Peters, Joanne (OS/ASPA)
Sent: Thursday, October 31, 2013 2:19 PM
To: Sandoe, Emma (CMS/OC); Bradley, Tasha (CMS/OC); Unruh, Patti (CMS/OC)
Subject: FW: CNN request: Healthcare.gov sending your info to 3rd parties

From: Pagliery, Jose [<mailto:Jose.Pagliery@turner.com>]
Sent: Thursday, October 31, 2013 11:37 AM
To: Peters, Joanne (OS/ASPA)
Subject: CNN request: Healthcare.gov sending your info to 3rd parties

Joanne,

I'm writing a story about background programs running on Healthcare.gov. The site is sending information from users' computers to Google subsidiary Doubleclick, Optimizely, Pingdom and Chartbeat.

Most of these are routine programs for private sites. But in the case of Doubleclick, it typically works with advertisements.

Here are my questions:

- Why is Healthcare.gov sending these third party companies a user's information?
- What information is it sending them?
- What is Doubleclick doing on behalf of the federal government for Healthcare.gov? What about Optimizely? Pingdom? Chartbeat?
- Is Doubleclick recording a user's behavior on Healthcare.gov? If so, what is it recording? Is it using that to provide targeted advertisements?

My deadline for this story is today at 4 p.m. Please let me know if you have any questions.

Sincerely,

JOSE PAGLIERY

STAFF REPORTER | CNNMONEY.COM

1 TIME WARNER CENTER | NEW YORK, NY 10019

OFFICE: (212) 275-7667

CELL: (b)(6)

TWITTER: [@JOSE_PAGLIERY](https://twitter.com/JOSE_PAGLIERY)

EMAIL: JOSE.PAGLIERY@CNN.COM | WEB: WWW.MONEY.CNN.COM

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 11/26/2013 5:47:16 PM
To: Fender, Rebecca (CMS/CCSQ) [NotResp]
[NotResp]
[NotResp] Basavaraju, Venkat (CMS/OIS) [NotResp]
[NotResp]
CC: Grothe, Kirk A. (CMS/OIS) [NotResp]
[NotResp] Oh, Mark U. (CMS/OIS) [NotResp]
[NotResp] Van, Hung B. (CMS/OIS) [NotResp]
[NotResp] Margush, Doug C.
[NotResp] Coutts, Todd
(CMS/OIS) [NotResp]
[NotResp] Lyles, Darrin V. (CMS/OIS)
(Darrin.Lyles@cms.hhs.gov) [NotResp]
[NotResp] Fletcher, John A. (CMS/OIS) [NotResp]
[NotResp]
Subject: RE: [NotResp]

Rebecca and Monique,

I am inclined to say yes we need this fix put in place. The fix is intended to resolve a serious issue where data, which is not a consumers, is showing up in searches and in [NotResp] This is starting to result in a high number of security and privacy incidents, and has a public view to it. We should have a quick meeting about this so CMS can make a final determination. Maybe it could come down, if needed, during this weekend to allow for the test?

Also I am not sure why testing can only be done in prod? Can't another set of self-signed certificates be issued to address this? or is it the case where there is not a matching environment to perform the testing in?

Tom

From: Fender, Rebecca (CMS/CCSQ)
Sent: Tuesday, November 26, 2013 10:52 AM
To: Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)
Subject: FW: [NotResp]
Importance: High

Hi Tom and Monique,

I have serious concerns about this "fix". Every time we do something with the URL we are down for days at [NotResp] We can only test this in PROD due to the [NotResp] that goes to [NotResp] and gets passed to [NotResp] Can you all let me know if you feel we need to take the risk of [NotResp] being down for a few days? Trust me when I say there is lots of pressure and focus on [NotResp] and any downtime they incur due to a CGI fix.

Becky

Becky Fender PMP®

CMS

Cell [NotResp]

Office 410-786-1006

From: Fender, Rebecca (CMS/CCSQ)

Sent: Tuesday, November 26, 2013 10:48 AM

To: 'O'Mara, Katyanne J (CGI Federal)'; Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: [NotResp]

I still do not feel that this is urgent and must happen as a priority. I will discuss with Tom and Monique. I do agree it should happen but I know this will take us down for several days and that simply can't happen at this time. There is NO way to test this other than in prod due to the [NotResp] assertion of their federated login.

Becky Fender PMP®

CMS

Cell [NotResp]

Office 410-786-1006

From: O'Mara, Katyanne J (CGI Federal) [<mailto:katyanne.omara@cgifederal.com>]

Sent: Tuesday, November 26, 2013 10:45 AM

To: Fender, Rebecca (CMS/CCSQ); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: [NotResp]

Hi Becky,

I understand your concern.

Defect numbers are in [NotResp] artf161121 / artf161124 and this is part of the List of 65, it is N3 which again was identified to better secure the sessions for both [NotResp]. If you have further concerns/questions please reach out to Tom Shankweiler.

To Test: Go through normal process as an [NotResp] while someone from our security team is in the backend ensures that new sessions go to Layer 7 and L7 clears out old sessions (ie. When an [NotResp] closes a completed application) and creates new sessions when they search and choose another application to work on or when they click the "Create Application" link.

Soumya, Manisha, Eddie and others, even Shaina can be part of the front end testing and Balaji will be assigning someone from his security team to work with us in a coordinated testing effort tomorrow to confirm that the sessions are being created and cleared appropriately.

Our Ops and Security team have completed their tasks. Sal will complete his tasks today. I just need confirmation from [NotResp] team that they made their change. We will be ready for the coordinated test tomorrow.

I will update the document I sent out with this information.

I hope this answers your questions and alleviates your concerns regarding testing. This is about closing the loop on **NotRes p** not changing your workflow or affecting your current workflow it's about making your current sessions more secure.

Thanks,
KO

Katy O'Mara | Manager | Health and Compliance Group | CGI Federal
W: 703-227-6411 | C: **NotRes p** www.cgi.com

From: Fender, Rebecca (CMS/CCSQ) [<mailto:Rebecca.Fender@cms.hhs.gov>]
Sent: Tuesday, November 26, 2013 9:58 AM
To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Venkat.Basavaraju; Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)
Subject: RE: **NotRes p**

I will try to call in later but have a conflicting meeting with NPC and leadership about the notices issues. Sorry. I really do NOT want to move forward with this until I understand how we plan to test and why this is such a rush as well as how it was discovered. As we know from past experience changes like this can keep **NotRes p** down for days and we cannot afford that at this time.

Becky Fender PMP®

CMS

Cell **NotRes p**

Office 410-786-1006

-----Original Appointment-----

From: O'Mara, Katyanne J (CGI Federal) [<mailto:katyanne.omara@cgifederal.com>]
Sent: Monday, November 25, 2013 4:20 PM
To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Fender, Rebecca (CMS/CCSQ); Roche, Jacqueline R. (CMS/CCIIO)
Subject: **NotRes p**
When: Tuesday, November 26, 2013 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).
Where: dial: **(b)(6)**

Hi Everyone,

I'd like to get an update on the tasks below and ensure we are on target for completion for tomorrow afternoon for testing to begin tomorrow night or Wednesday morning in Test 2.

Detailed Technical Action Items:

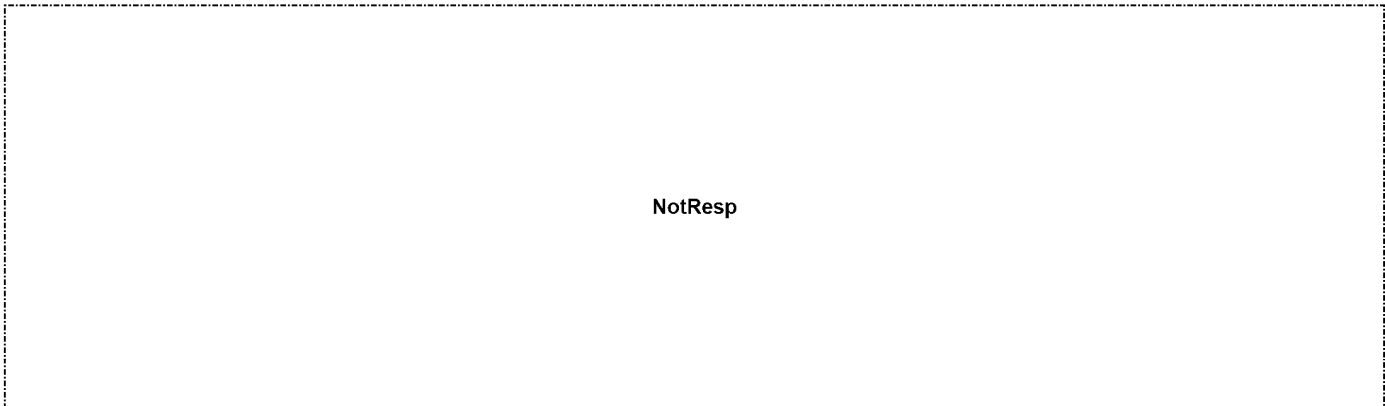
Team Tasks

1. Currently [NotRes SD] is protecting the URL https://[NotResp] Change the policy to protect the following URL pattern. https://[NotResp]
2. All the header variables remains the same. (NO CHANGES REQUIRED)



FFM Ops Team Tasks

1. Add the following [NotRes p] rules for the English



2. Restart the [NotResp] for the English

FFM Security Team Tasks

1. Create a dummy policy for [NotResp]
2. Create a layer7 policy for [NotResp]
3. Read information from the HTTP headers set by the [NotResp]
4. Invalidate the existing [NotResp]
5. Recreate a new [NotResp]
6. Redirect to the individual application
7. Create a new flow and show the difference from the existing flow.

Application Team Tasks

1. Do a ping to https://[NotResp] every 10 or 15 minutes to keep the [NotRes p] session active from the main [NotRes] page. (Please get the guidance from Jeremy)
2. Currently in the [NotResp] page when the [NotRes] worker searches for an [NotResp] and clicks on the link, it takes the user to the [NotResp]. Instead do a [NotResp] to

https://[redacted] Obtained via FOIA by Judicial Watch, Inc. [redacted] The [redacted] should be
[redacted] NotResp

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
 on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 11/26/2013 10:17:13 PM
To: Reinhold, Leslie A. (CMS/OEM) [NotResp]
Subject: FW: ESW Session Management Checkin

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Tuesday, November 26, 2013 12:47 PM
To: Fender, Rebecca (CMS/CCSQ); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)
Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS) (Darrin.Lyles@cms.hhs.gov); Fletcher, John A. (CMS/OIS)
Subject: RE: [NotResp]

Rebecca and Monique,

I am inclined to say yes we need this fix put in place. The fix is intended to resolve a serious issue where data, which is not a consumers, is showing up in searches and in [NotResp]. This is starting to result in a high number of security and privacy incidents, and has a public view to it. We should have a quick meeting about this so CMS can make a final determination. Maybe it could come down, if needed, during this weekend to allow for the test?

Also I am not sure why testing can only be done in prod? Can't another set of self-signed certificates be issued to address this? or is it the case where there is not a matching environment to perform the testing in?

Tom

From: Fender, Rebecca (CMS/CCSQ)
Sent: Tuesday, November 26, 2013 10:52 AM
To: Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)
Subject: FW: [NotResp]
Importance: High

Hi Tom and Monique,

I have serious concerns about this "fix". Every time we do something with the URL we are down for days at [NotResp]. We can only test this in PROD due to the federated [NotResp] that goes to [NotResp] and gets passed to [NotResp]. Can you all let me know if you feel we need to take the risk of [NotResp] being down for a few days? Trust me when I say there is lots of pressure and focus on [NotResp] and any downtime they incur due to a CGI fix.

Becky

Becky Fender PMP®

CMS

Cell: [Redacted] (b)(6)

Office 410-786-1006

From: Fender, Rebecca (CMS/CCSQ)

Sent: Tuesday, November 26, 2013 10:48 AM

To: 'O'Mara, Katyanne J (CGI Federal)'; Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjana Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: [REDACTED] NotResp

I still do not feel that this is urgent and must happen as a priority. I will discuss with Tom and Monique. I do agree it should happen but I know this will take us down for several days and that simply can't happen at this time. There is NO way to test this other than in prod due to the [REDACTED] assertion of their federated login.

Becky Fender PMP®

CMS

Cell: [REDACTED] (b)(6)

Office 410-786-1006

From: O'Mara, Katyanne J (CGI Federal) [<mailto:katyanne.omara@cgifederal.com>]

Sent: Tuesday, November 26, 2013 10:45 AM

To: Fender, Rebecca (CMS/CCSQ); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjana Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: [REDACTED] (b)(6)

Hi Becky,

I understand your concern.

Defect numbers are in [REDACTED] artf161121 / artf161124 and this is part of the List of 65, it is N3 which again was identified to better secure the sessions for both [REDACTED] and [REDACTED]. If you have further concerns/questions please reach out to Tom Shankweiler.

To Test: Go through normal process as an [REDACTED] while someone from our security team is in the backend ensures that new sessions go to Layer 7 and L7 clears out old sessions (ie. When an [REDACTED] closes a completed application) and creates new sessions when they search and choose another application to work on or when they click the "Create Application" link.

Soumya, Manisha, Eddie and others, even Shaina can be part of the front end testing and Balaji will be assigning someone from his security team to work with us in a coordinated testing effort tomorrow to confirm that the sessions are being created and cleared appropriately.

Our Ops and Security team have completed their tasks. Sal will complete his tasks today. I just need confirmation from [REDACTED] team that they made their change. We will be ready for the coordinated test tomorrow.

I will update the document I sent out with this information.

I hope this answers your questions and alleviates your concerns regarding testing. This is about closing the loop on open sessions, not changing your workflow or affecting your current workflow it's about making your current sessions more secure.

Thanks,
KO

Katy O'Mara | Manager | Health and Compliance Group | CGI Federal
W: 703-227-6411 | C: (b)(6) www.cgi.com

From: Fender, Rebecca (CMS/CCSQ) [<mailto:Rebecca.Fender@cms.hhs.gov>]

Sent: Tuesday, November 26, 2013 9:58 AM

To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Venkat.Basavaraju; Niranjana Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: ESW Session Management Checkin

I will try to call in later but have a conflicting meeting with NPC and leadership about the notices issues. Sorry. I really do NOT want to move forward with this until I understand how we plan to test and why this is such a rush as well as how it was discovered. As we know from past experience changes like this can keep NotRes
P down for days and we cannot afford that at this time.

Becky Fender PMP®

CMS

Cell: (b)(6)

Office 410-786-1006

-----Original Appointment-----

From: O'Mara, Katyanne J (CGI Federal) [<mailto:katyanne.omara@cgifederal.com>]

Sent: Monday, November 25, 2013 4:20 PM

To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjana Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Fender, Rebecca (CMS/CCSQ); Roche, Jacqueline R. (CMS/CCIIO)

Subject: NotResp

When: Tuesday, November 26, 2013 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).

Where: dial:

Hi Everyone,

I'd like to get an update on the tasks below and ensure we are on target for completion for tomorrow afternoon for testing to begin tomorrow night or Wednesday morning in Test 2.

Detailed Technical Action Items:

EIDM Team Tasks

1. Currently [NOTRE] is protecting the [NotResp] Change the policy to protect the following [NotResp]
2. All the header variables remains the same. (NO CHANGES REQUIRED)

NotResp

FFM Ops Team Tasks

1. Add the following [NotRe] rules for the English

NotResp

2. Restart the [NotResp] for the English

FFM Security Team Tasks

1. Create a dummy policy for [NotResp]
2. Create a layer7 policy for /
3. Read information from the HTTP headers set by the [NOTRE] webgate
4. Invalidate the existing [NotResp]
5. Recreate a new [NotResp]
6. Redirect to the individual application
7. Create a new flow and show the difference from the existing flow.

Application Team Tasks

1. Do a ping to https://[NotResp] every 10 or 15 minutes to keep the [NotRes p] session active from the main [Not] page. (Please get the guidance from Jeremy)
2. Currently in the [NotResp] page when the [NOT Res] worker searches for an [NotResp] and clicks on the link, it takes the user to the [NotResp] instead do a [NotResp] to

https://

NotResp

The

NotResp

Parameter should be

NotResp

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
 on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 11/26/2013 10:18:43 PM
To: Outerbridge, Monique (CMS/OIS) [NotResp]
 [NotResp]; Basavaraju, Venkat (CMS/OIS) [NotResp]
 [NotResp]; Fender, Rebecca (CMS/CCSQ) [NotResp]
CC: Grothe, Kirk A. (CMS/OIS) [NotResp]
 [NotResp]; Oh, Mark U. (CMS/OIS) [NotResp]
 [NotResp]; Van, Hung B. (CMS/OIS) [NotResp]
 [NotResp]; Hung.Van.CMS]; Margush, Doug C. (CMS/OIS) [NotResp]
 [NotResp]; Coutts, Todd (CMS/OIS) [NotResp]
 [NotResp]; Lyles, Darrin V. (CMS/OIS) (Darrin.Lyles@cms.hhs.gov) [NotResp]
 [NotResp]; Fletcher, John A. (CMS/OIS) [NotResp]
Subject: RE: [NotResp]

Did this get resolved today? I can participate in a call later tonight.

Tom

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Tuesday, November 26, 2013 12:47 PM
To: Fender, Rebecca (CMS/CCSQ); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)
Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS) (Darrin.Lyles@cms.hhs.gov); Fletcher, John A. (CMS/OIS)
Subject: RE: [NotResp]

Rebecca and Monique,

I am inclined to say yes we need this fix put in place. The fix is intended to resolve a serious issue where data, which is not a consumers, is showing up in searches and in [NotResp]. This is starting to result in a high number of security and privacy incidents, and has a public view to it. We should have a quick meeting about this so CMS can make a final determination. Maybe it could come down, if needed, during this weekend to allow for the test?

Also I am not sure why testing can only be done in prod? Can't another set of self-signed certificates be issued to address this? or is it the case where there is not a matching environment to perform the testing in?

Tom

From: Fender, Rebecca (CMS/CCSQ)
Sent: Tuesday, November 26, 2013 10:52 AM
To: Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)

Subject: FW: [NotResp]

Importance: High

Hi Tom and Monique,

I have serious concerns about this "fix". Every time we do something with the URL we are down for days at [NotResp]. We can only test this in PROD due to the federated [NotResp] that goes to [NotResp] and gets passed to [NotResp]. Can you all let me know if you feel we need to take the risk of [NotResp] being down for a few days? Trust me when I say there is lots of pressure and focus on [NotResp] and any downtime they incur due to a CGI fix.

Becky

Becky Fender PMP®

CMS

Cell 443-517-7037

Office 410-786-1006

From: Fender, Rebecca (CMS/CCSQ)

Sent: Tuesday, November 26, 2013 10:48 AM

To: 'O'Mara, Katyanne J (CGI Federal)'; Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: [NotResp]

I still do not feel that this is urgent and must happen as a priority. I will discuss with Tom and Monique. I do agree it should happen but I know this will take us down for several days and that simply can't happen at this time. There is NO way to test this other than in prod due to the [NotResp] assertion of their federated login.

Becky Fender PMP®

CMS

Cell 443-517-7037

Office 410-786-1006

From: O'Mara, Katyanne J (CGI Federal) [<mailto:katyanne.omara@cgifederal.com>]

Sent: Tuesday, November 26, 2013 10:45 AM

To: Fender, Rebecca (CMS/CCSQ); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: [NotResp]

Hi Becky,

I understand your concern.

Defect numbers are in [NotResp] artf161121 / artf161124 and this is part of the List of 65, it is N3 which again was identified to better secure the sessions for both [NotResp] and [NotResp]. If you have further concerns/questions please reach out to Tom Shankweiler.

To Test: Go through normal process as an [NOT Res] while someone from our security team is in the backend ensures that new sessions go to Layer 7 and L7 clears out old sessions (ie. When an [Not Res] closes a completed application) and creates new sessions when they search and choose another application to work on or when they click the "Create Application" link.

Soumya, Manisha, Eddie and others, even Shaina can be part of the front end testing and Balaji will be assigning someone from his security team to work with us in a coordinated testing effort tomorrow to confirm that the sessions are being created and cleared appropriately.

Our Ops and Security team have completed their tasks. Sal will complete his tasks today. I just need confirmation from [NOT Res] team that they made their change. We will be ready for the coordinated test tomorrow.

I will update the document I sent out with this information.

I hope this answers your questions and alleviates your concerns regarding testing. This is about closing the loop on open sessions, not changing your workflow or affecting your current workflow it's about making your current sessions more secure.

Thanks,
KO

Katy O'Mara | Manager | Health and Compliance Group | CGI Federal
W: 703-227-6411 | C: [REDACTED] | www.cgi.com

From: Fender, Rebecca (CMS/CCSQ) [<mailto:Rebecca.Fender@cms.hhs.gov>]

Sent: Tuesday, November 26, 2013 9:58 AM

To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Venkat.Basavaraju; Niranjana Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: [REDACTED] NotResp

I will try to call in later but have a conflicting meeting with NPC and leadership about the notices issues. Sorry. I really do NOT want to move forward with this until I understand how we plan to test and why this is such a rush as well as how it was discovered. As we know from past experience changes like this can keep [NOT Res] down for days and we cannot afford that at this time.

Becky Fender PMP®

CMS

Cell [REDACTED] (b)(6)

Office 410-786-1006

-----Original Appointment-----

From: O'Mara, Katyanne J (CGI Federal) [<mailto:katyanne.omara@cgifederal.com>]

Sent: Monday, November 25, 2013 4:20 PM

To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Fender, Rebecca (CMS/CCSQ); Roche, Jacqueline R. (CMS/CCIIO)

Subject: [Redacted] NotResp

When: Tuesday, November 26, 2013 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).

Where: dial: [Redacted] (b)(6)

Hi Everyone,

I'd like to get an update on the tasks below and ensure we are on target for completion for tomorrow afternoon for testing to begin tomorrow night or Wednesday morning in Test 2.

Detailed Technical Action Items:

[Redacted] Team Tasks

1. Currently, [Redacted] is protecting the URL [Redacted] Change the policy to protect the following URL pattern. [Redacted]
2. All the header variables remains the same. (NO CHANGES REQUIRED)

[Redacted] NotResp

FFM Ops Team Tasks

1. Add the following RP rules for the English

[Redacted] NotResp

2. Restart the [Redacted] for the English

FFM Security Team Tasks

1. Create a dummy policy for [Redacted]
2. Create a layer7 policy for / [Redacted]
3. Read information from the HTTP headers set by the [Redacted] webgate

4. Invalidate the existing [NotResp]
5. Recreate a new [NotResp]
6. Redirect to the individual application
7. Create a new flow and show the difference from the existing flow.

Application Team Tasks

1. Do a ping to [https://\[NotResp\]](https://[NotResp]) every 10 or 15 minutes to keep the [NotResp] session active from the main [Not] page. (Please get the guidance from Jeremy)
2. Currently in the [NotResp] page when the [Not Re] worker searches for an [NotResp] and clicks on the link, it takes the user to the IndividualApp. Instead do a [NotResp] to

[https://\[NotResp\]](https://[NotResp]) The [NotResp] Parameter should be

[NotResp]

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]

Sent: 11/26/2013 11:56:58 PM

To: Fender, Rebecca (CMS/CCSQ) [NotResp]
[NotResp] Outerbridge, Monique (CMS/OIS) [NotResp]
[NotResp] Basavaraju, Venkat (CMS/OIS) [NotResp]

CC: Grothe, Kirk A. (CMS/OIS) [NotResp]
[NotResp] Oh, Mark U. (CMS/OIS) [NotResp]
[NotResp] Van, Hung B. (CMS/OIS) [NotResp]
[NotResp] Margush,
Doug C. (CMS/OIS) [NotResp]
Couts, Todd (CMS/OIS) [NotResp]
[NotResp] Lyles, Darrin V. (CMS/OIS) [NotResp]
[NotResp] Fletcher,
John A. (CMS/OIS) [NotResp]

Subject: RE: [NotResp]

Here is my concern. This change will also effect the way consumers pull data. If we launch and we get a drove of people show up on the 30th and their are presented with exposure of PII, we will have a very bad situation on our hands. So now we are faced with the possibility that [NotResp] could be down for days, when it MUST be up, and the possibility of exposing PII and experiencing a new round of political attacks.

I think if we coordinate decisively that we can all make this work. It would mean identifying a roll-back plan, and implementing the changes on Friday morning, testing by [NotResp] and rolling-back quickly if it is not successful. I am not sure what all would need to happen to make this happen, but I think we need to launch on the 30th with a reduced risk of PII exposure; that should be the goal.

I'll be on the 9pm call, and hope maybe we can talk about this near the conclusion of the call.

Thanks,

Tom

From: Fender, Rebecca (CMS/CCSQ)
Sent: Tuesday, November 26, 2013 6:28 PM
To: Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)
Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS); Fletcher, John A. (CMS/OIS)
Subject: RE: [NotResp]

Hi All,

I just had a quick call with Tom. I am attaching a document I asked CGI to put together a few days ago when this first came to my attention. Again, I agree this needs to take place and is very important but each time we do something with URLs/Servers or Logins we are down for many days with [NotResp] fact we were down today due to changes [NotResp] made. We need to make sure our timing is coordinated(across all contractors), we have appropriate resources available, a rollback plan and possibly do it after hours/early morning. Whatever timing is decided, we need to make sure all leadership understands the risks to doing it (taking [NotResp] down) and not doing it (exposing PII). I'm not sure something prior to the 30th and our immediate push to clear [NotResp] coordinates well with this effort. I will leave it to the group to make recommendations to leadership on timing and priorities.

Defect numbers are in [NotResp] artf161121 / artf161124 and this is part of the List of 65, it is N3 which again was identified to better secure the sessions for both [NotResp] If you have further concerns/questions please reach out to Tom Schankweiler.

To Test: Go through normal process as ar [NotResp] while someone from our security team is in the backend ensures that new sessions go to Layer 7 and L7 clears out old sessions (ie. When an [NotResp] closes a completed application) and creates new sessions when they search and choose another application to work on or when they click the "Create Application" link.

Let me know if you have questions.

Becky

Becky Fender PMP®

CMS

Cell [Redacted] (b)(6)

Office 410-786-1006

From: Schankweiler, Thomas W. (CMS/OIS)

Sent: Tuesday, November 26, 2013 5:19 PM

To: Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS); Fender, Rebecca (CMS/CCSQ)

Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS); Fletcher, John A. (CMS/OIS)

Subject: RE: [Redacted] NotResp

Did this get resolved today? I can participate in a call later tonight.

Tom

From: Schankweiler, Thomas W. (CMS/OIS)

Sent: Tuesday, November 26, 2013 12:47 PM

To: Fender, Rebecca (CMS/CCSQ); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)

Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS) (Darrin.Lyles@cms.hhs.gov); Fletcher, John A. (CMS/OIS)

Subject: RE: [Redacted] NotResp

Rebecca and Monique,

I am inclined to say yes we need this fix put in place. The fix is intended to resolve a serious issue where data, which is not a consumers, is showing up in searches and in [Redacted] This is starting to result in a high number of security and privacy incidents, and has a public view to it. We should have a quick meeting about this so CMS can make a final determination. Maybe it could come down, if needed, during this weekend to allow for the test?

Also I am not sure why testing can only be done in prod? Can't another set of self-signed certificates be issued to address this? or is it the case where there is not a matching environment to perform the testing in?

Tom

From: Fender, Rebecca (CMS/CCSQ)
Sent: Tuesday, November 26, 2013 10:52 AM
To: Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)
Subject: FW: [REDACTED] NotResp
Importance: High

Hi Tom and Monique,

I have serious concerns about this "fix". Every time we do something with the URL we are down for days at SERCO. We can only test this in PROD due to the [REDACTED] NotResp that goes to [REDACTED] NotResp and gets passed to [REDACTED] NotResp. Can you all let me know if you feel we need to take the risk of [REDACTED] NotResp being down for a few days? Trust me when I say there is lots of pressure and focus on [REDACTED] NotResp and any downtime they incur due to a CGI fix.

Becky

Becky Fender PMP®
CMS
Cell [REDACTED] (b)(6)
Office 410-786-1006

From: Fender, Rebecca (CMS/CCSQ)
Sent: Tuesday, November 26, 2013 10:48 AM
To: 'O'Mara, Katyanne J (CGI Federal)'; Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)
Subject: [REDACTED] NotResp

I still do not feel that this is urgent and must happen as a priority. I will discuss with Tom and Monique. I do agree it should happen but I know this will take us down for several days and that simply can't happen at this time. There is NO way to test this other than in prod due to the [REDACTED] NotResp assertion of their federated login.

Becky Fender PMP®
CMS
Cell [REDACTED] (b)(6)
Office 410-786-1006

From: O'Mara, Katyanne J (CGI Federal) [<mailto:katyanne.omara@cgifederal.com>]
Sent: Tuesday, November 26, 2013 10:45 AM
To: Fender, Rebecca (CMS/CCSQ); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)
Subject: RE: [REDACTED] NotResp

Hi Becky,

I understand your concern.

Defect numbers are in [NotResp] artf161121 / artf161124 and this is part of the List of 65, it is N3 which again was identified to better secure the sessions for both [NotResp] If you have further concerns/questions please reach out to Tom Shankweiler.

To Test: Go through normal process as an [NotResp] while someone from our security team is in the backend ensures that new sessions go to Layer 7 and L7 clears out old sessions (ie. When an [NotResp] closes a completed application) and creates new sessions when they search and choose another application to work on or when they click the "Create Application" link.

Soumya, Manisha, Eddie and others, even Shaina can be part of the front end testing and Balaji will be assigning someone from his security team to work with us in a coordinated testing effort tomorrow to confirm that the sessions are being created and cleared appropriately.

Our Ops and Security team have completed their tasks. Sal will complete his tasks today. I just need confirmation from [NotResp] team that they made their change. We will be ready for the coordinated test tomorrow.

I will update the document I sent out with this information.

I hope this answers your questions and alleviates your concerns regarding testing. This is about closing the loop on open sessions, not changing your workflow or affecting your current workflow it's about making your current sessions more secure.

Thanks,
KO

Katy O'Mara | Manager | Health and Compliance Group | CGI Federal
W: 703-227-6411 | C: [b)(6)] | www.cgi.com

From: Fender, Rebecca (CMS/CCSQ) [mailto:Rebecca.Fender@cms.hhs.gov]

Sent: Tuesday, November 26, 2013 9:58 AM

To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Venkat.Basavaraju; Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: [NotResp]

I will try to call in later but have a conflicting meeting with NPC and leadership about the notices issues. Sorry. I really do NOT want to move forward with this until I understand how we plan to test and why this is such a rush as well as how it was discovered. As we know from past experience changes like this can keep [NotResp] down for days and we cannot afford that at this time.

Becky Fender PMP®

CMS

Cell: [b)(6)]

Office 410-786-1006

-----Original Appointment-----

From: O'Mara, Katyanne J (CGI Federal) [mailto:katyanne.omara@cgifederal.com]

Sent: Monday, November 25, 2013 4:20 PM

To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjana Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Fender, Rebecca (CMS/CCSQ); Roche, Jacqueline R. (CMS/CCIIO)

Subject: [REDACTED] NotResp

When: Tuesday, November 26, 2013 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).

Where: dial: [REDACTED] (b)(6)

Hi Everyone,

I'd like to get an update on the tasks below and ensure we are on target for completion for tomorrow afternoon for testing to begin tomorrow night or Wednesday morning in Test 2.

Detailed Technical Action Items:

EIDM Team Tasks

1. Currently [REDACTED] is protecting the URL https://[REDACTED] Change the policy to protect the following URL pattern. https://[REDACTED]
2. All the header variables remains the same. (NO CHANGES REQUIRED)

[REDACTED] NotResp

FFM Ops Team Tasks

1. Add the following [REDACTED] rules for the English

[REDACTED] NotResp

2. Restart the [REDACTED] for the English

FFM Security Team Tasks

1. Create a dummy policy for /marketplace
2. Create a layer7 policy for /marketplace

[REDACTED] NotResp

[REDACTED] NotResp

3. Read information from the HTTP headers set by the NotResp webgate
4. Invalidate the existing NotResp
5. Recreate a new NotResp
6. Redirect to the individual application
7. Create a new flow and show the difference from the existing flow.

Application Team Tasks

1. Do a ping to https://NotResp every 10 or 15 minutes to keep the NotResp on active from the main NotResp page. (Please get the guidance from Jeremy)
2. Currently in the NotResp page when the NotRes worker searches for an NotResp and clicks on the link, it takes the user to the NotResp. Instead do a NotResp to https://NotResp. The NotResp Parameter should be NotResp

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]

Sent: 11/27/2013 2:04:16 AM

To: Outerbridge, Monique (CMS/OIS) [NotResp]
[NotResp] Fender, Rebecca (CMS/CCSQ) [NotResp]
[NotResp]; Basavaraju, Venkat (CMS/OIS) [NotResp]
[NotResp]

CC: Grothe, Kirk A. (CMS/OIS) [NotResp]
[NotResp] Oh, Mark U. (CMS/OIS) [NotResp]
[NotResp] Van, Hung B. (CMS/OIS) [NotResp]
[NotResp] Margush,
Doug C. (CMS/OIS) [NotResp]
Couts, Todd (CMS/OIS) [NotResp]
[NotResp] Lyles, Darrin V. (CMS/OIS) [NotResp]
[NotResp] Fletcher,
John A. (CMS/OIS) [/] [NotResp]

Subject: RE: [NotResp]

when do you want to have it? I am out of the office on Wed, Friday. But can be available to discuss. Just worried about timing at this point. I can hang after the call if people want.

Tom

From: Outerbridge, Monique (CMS/OIS)
Sent: Tuesday, November 26, 2013 7:57 PM
To: Schankweiler, Thomas W. (CMS/OIS); Fender, Rebecca (CMS/CCSQ); Basavaraju, Venkat (CMS/OIS)
Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS); Fletcher, John A. (CMS/OIS)
Subject: Re: [NotResp]

That's not really what that call is for and I'd like to keep it separate. Let's have a call to figure this out but it should not be part of the Go / No Go.

We need to get this resolved. PII security breaches take priority.

Monique Outerbridge
 Director
 Consumer Information and Insurance Systems Group
 Office of Information Services, CMS
 301-492-4376
 410-786-5308 (Alt. Office)

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Tuesday, November 26, 2013 06:56 PM
To: Fender, Rebecca (CMS/CCSQ); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)
Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS); Fletcher, John A. (CMS/OIS)
Subject: RE: [NotResp]

Here is my concern. This change will also effect the way consumers pull data. If we launch and we get a drove of people show up on the 30th and their are presented with exposure of PII, we will have a very bad situation on our hands. So now we are faced with the possibility that [NotRes p] could be down for days, when it MUST be up, and the possibility of exposing PII and experiencing a new round of political attacks.

I think if we coordinate decisively that we can all make this work. It would mean identifying a roll-back plan, and implementing the changes on Friday morning, testing by [NotRes p] and rolling-back quickly if it is not successful. I am not sure what all would need to happen to make this happen, but I think we need to launch on the 30th with a reduced risk of PII exposure; that should be the goal.

I'll be on the 9pm call, and hope maybe we can talk about this near the conclusion of the call.

Thanks,

Tom

From: Fender, Rebecca (CMS/CCSQ)

Sent: Tuesday, November 26, 2013 6:28 PM

To: Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)

Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS); Fletcher, John A. (CMS/OIS)

Subject: RE: [NotRes p]

Hi All,

I just had a quick call with Tom. I am attaching a document I asked CGI to put together a few days ago when this first came to my attention. Again, I agree this needs to take place and is very important but each time we do something with URLs/Servers or Logins we are down for many days with [NotRes p]. In fact we were down today due to changes [NotRes p] made. We need to make sure our timing is coordinated(across all contractors), we have appropriate resources available, a rollback plan and possibly do it after hours/early morning. Whatever timing is decided, we need to make sure all leadership understands the risks to doing it (taking [NotRes p] down) and not doing it (exposing PII). I'm not sure something prior to the 30th and our immediate push to clear [NotRes p] coordinates well with this effort. I will leave it to the group to make recommendations to leadership on timing and priorities.

Defect numbers are in [NotRes p] artf161121 / artf161124 and this is part of the List of 65, it is N3 which again was identified to better secure the sessions for both [NotRes p] If you have further concerns/questions please reach out to Tom Schankweiler.

To Test: Go through normal process as an [NotRes p] while someone from our security team is in the backend ensures that new sessions go to Layer 7 and L7 clears out old sessions (ie. When an [NotRes p] closes a completed application) and creates new sessions when they search and choose another application to work on or when they click the "Create Application" link.

Let me know if you have questions.

Becky

Becky Fender PMP®

CMS

Cell: [b)(6)]

Office 410-786-1006

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Tuesday, November 26, 2013 5:19 PM
To: Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS); Fender, Rebecca (CMS/CCSQ)
Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS); Fletcher, John A. (CMS/OIS)
Subject: RE: [NotResp]

Did this get resolved today? I can participate in a call later tonight.

Tom

From: Schankweiler, Thomas W. (CMS/OIS)
Sent: Tuesday, November 26, 2013 12:47 PM
To: Fender, Rebecca (CMS/CCSQ); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)
Cc: Grothe, Kirk A. (CMS/OIS); Oh, Mark U. (CMS/OIS); Van, Hung B. (CMS/OIS); Margush, Doug C. (CMS/OIS); Coutts, Todd (CMS/OIS); Lyles, Darrin V. (CMS/OIS) (Darrin.Lyles@cms.hhs.gov); Fletcher, John A. (CMS/OIS)
Subject: RE: [NotResp]

Rebecca and Monique,

I am inclined to say yes we need this fix put in place. The fix is intended to resolve a serious issue where data, which is not a consumers, is showing up in searches and in [NotResp] This is starting to result in a high number of security and privacy incidents, and has a public view to it. We should have a quick meeting about this so CMS can make a final determination. Maybe it could come down, if needed, during this weekend to allow for the test?

Also I am not sure why testing can only be done in prod? Can't another set of self-signed certificates be issued to address this? or is it the case where there is not a matching environment to perform the testing in?

Tom

From: Fender, Rebecca (CMS/CCSQ)
Sent: Tuesday, November 26, 2013 10:52 AM
To: Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique (CMS/OIS); Basavaraju, Venkat (CMS/OIS)
Subject: FW: [NotResp]
Importance: High

Hi Tom and Monique,

I have serious concerns about this "fix". Every time we do something with the URL we are down for days at [NotRe_sp] We can only test this in PROD due to the federated [NotRe_sp] that goes to [NotRe_sp] and gets passed to [NotRe] Can you all let me know if you feel we need to take the risk of [NotRe_p] being down for a few days? Trust me when I say there is lots of pressure and focus on [NotRe_sp] and any downtime they incur due to a CGI fix.

Becky

Becky Fender PMP®
CMS

Cell (b)(6)

Office 410-786-1006

From: Fender, Rebecca (CMS/CCSQ)

Sent: Tuesday, November 26, 2013 10:48 AM

To: 'O'Mara, Katyanne J (CGI Federal)'; Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: NotResp

I still do not feel that this is urgent and must happen as a priority. I will discuss with Tom and Monique. I do agree it should happen but I know this will take us down for several days and that simply can't happen at this time. There is NO way to test this other than in prod due to the NotResp assertion of their federated login.

Becky Fender PMP®

CMS

Cell (b)(6)

Office 410-786-1006

From: O'Mara, Katyanne J (CGI Federal) [mailto:katyanne.omara@cgifederal.com]

Sent: Tuesday, November 26, 2013 10:45 AM

To: Fender, Rebecca (CMS/CCSQ); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: NotResp

Hi Becky,

I understand your concern.

Defect numbers are in: NotResp artf161121 / artf161124 and this is part of the List of 65, it is N3 which again was identified to better secure the sessions for both NotResp. If you have further concerns/questions please reach out to Tom Shankweiler.

To Test: Go through normal process as an NotResp while someone from our security team is in the backend ensures that new sessions go to Layer 7 and L7 clears out old sessions (ie. When an NotResp poses a completed application) and creates new sessions when they search and choose another application to work on or when they click the "Create Application" link.

Soumya, Manisha, Eddie and others, even Shaina can be part of the front end testing and Balaji will be assigning someone from his security team to work with us in a coordinated testing effort tomorrow to confirm that the sessions are being created and cleared appropriately.

Our Ops and Security team have completed their tasks. Sal will complete his tasks today. I just need confirmation from NotResp team that they made their change. We will be ready for the coordinated test tomorrow.

I will update the document I sent out with this information.

I hope this answers your questions and alleviates your concerns regarding testing. This is about closing the loop on open sessions, not changing your workflow or affecting your current workflow it's about making your current sessions more secure.

Thanks,
KO

Katy O'Mara | Manager | Health and Compliance Group | CGI Federal
W: 703-227-6411 | C: (b)(6) | www.cgi.com

From: Fender, Rebecca (CMS/CCSQ) [<mailto:Rebecca.Fender@cms.hhs.gov>]

Sent: Tuesday, November 26, 2013 9:58 AM

To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Venkat.Basavaraju; Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Roche, Jacqueline R. (CMS/CCIIO)

Subject: RE: (b)(6) NotResp

I will try to call in later but have a conflicting meeting with NPC and leadership about the notices issues. Sorry. I really do NOT want to move forward with this until I understand how we plan to test and why this is such a rush as well as how it was discovered. As we know from past experience changes like this can keep (b)(6) down for days and we cannot afford that at this time.

Becky Fender PMP®

CMS

Cell (b)(6)

Office 410-786-1006

-----Original Appointment-----

From: O'Mara, Katyanne J (CGI Federal) [<mailto:katyanne.omara@cgifederal.com>]

Sent: Monday, November 25, 2013 4:20 PM

To: O'Mara, Katyanne J (CGI Federal); Minze Chien; Venky Natarajan; Basavaraju, Venkat (CMS/OIS); Niranjan Santhamoorthy; greg.greshman.health@gmail.com; Nitin Matta; Girish Shetty; Sundar, Raj N (CGI Federal); Thangavelu, Raja (Non-Member); Ivan Vinogradov; Ramamoorthy, Balaji Manikandan (CGI Federal); Anbu, Bala (Non-Member); Cecilio, Sal (CGI Federal); Fender, Rebecca (CMS/CCSQ); Roche, Jacqueline R. (CMS/CCIIO)

Subject: (b)(6) NotResp

When: Tuesday, November 26, 2013 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).

Where: (b)(6)

Hi Everyone,

I'd like to get an update on the tasks below and ensure we are on target for completion for tomorrow afternoon for testing to begin tomorrow night or Wednesday morning in Test 2.

Detailed Technical Action Items:

NOTRE SD Team Tasks

1. Currently **NotR** is protecting the URL [https://\[NotResp\]](https://[NotResp]) Change the policy to protect the following URL pattern. [https://\[NotResp\]](https://[NotResp])
2. All the header variables remains the same. (NO CHANGES REQUIRED)

NotResp

FFM Ops Team Tasks

1. Add the following RP rules for the English

NotResp

2. Restart the **NotResp** for the English

FFM Security Team Tasks

1. Create a dummy policy for **NotResp**
2. Create a layer7 policy for **NotResp**
3. Read information from the HTTP headers set by the **NotResp** webgate
4. Invalidate the existing FFM **NotResp**
5. Recreate a new FFM **NotResp**
6. Redirect to the individual application
7. Create a new flow and show the difference from the existing flow.

Application Team Tasks

1. Do a ping to [https://\[NotResp\]](https://[NotResp]) every 10 or 15 minutes to keep the **NotRes p** session active from the main **NotRes p** page. (Please get the guidance from Jeremy)
2. Currently in the [https://\[NotResp\]](https://[NotResp]) page when the **Not Res** worker searches for an **NotResp** and clicks on the link, it takes the user to the **NotResp** instead do a **NotResp** to [https://\[NotResp\]](https://[NotResp])

NotResp

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 11/26/2013 9:46:36 PM
To: Coutts, Todd (CMS/OIS); [NotResp]
[NotResp]
CC: Warren, Kevin (CMS/OIS); [NotResp]
[NotResp]; Fletcher, John A. (CMS/OIS) [NotResp]
[NotResp]; Van, Hung B. (CMS/OIS) [NotResp]
[NotResp]; Grothe, Kirk A.
[NotResp]
[NotResp]; Lyles, Darrin V. (CMS/OIS) [NotResp]
[NotResp]; Venky Natarajan'
[NotResp]; lynn.goodrich@cgifederal.com;
Thomas.Kirk@gss-cgi.com; 'Ramamoorthy, Balaji Manikandan (CGI Federal)'
(balajimanikandan.ramamoorthy@cgifederal.com) [balajimanikandan.ramamoorthy@cgifederal.com]; Outerbridge,
Monique (CMS/OIS); [NotResp]
Subject: RE: Security Items that Need Attention
Flag: Follow up

We are working through the list to see if any of the others need to be escalated, there are folks working on them in general to make sure that they are being worked and updated. Please do help us with getting the priorities addressed.

Thanks,

Tom

From: Coutts, Todd (CMS/OIS)
Sent: Tuesday, November 26, 2013 3:48 PM
To: Schankweiler, Thomas W. (CMS/OIS); Kane, David (CMS/OIS); Michael Finkel
Cc: Warren, Kevin (CMS/OIS); Fletcher, John A. (CMS/OIS); Van, Hung B. (CMS/OIS); Grothe, Kirk A. (CMS/OIS); Lyles, Darrin V. (CMS/OIS); 'Venky Natarajan' (vnatarajan@qssinc.com) (vnatarajan@qssinc.com); lynn.goodrich@cgifederal.com; Thomas.Kirk@gss-cgi.com; 'Ramamoorthy, Balaji Manikandan (CGI Federal)' (balajimanikandan.ramamoorthy@cgifederal.com); Outerbridge, Monique (CMS/OIS)
Subject: Security Items that Need Attention

QSSI and CGI,

I am writing to highlight several security incidents that need your attention. As they are security issues, please consider the [NotResp] ticket your authorization to act. I am only sending the [NotResp] numbers to avoid transmitting too much detail. By tomorrow, please communicate back to use their status (closed, in process, etc) and at least a tentative date for resolution.

1. These are the two that Tom Schankweiler raised today.
 - INC000002589982
 - artf161265 INC2598675

2. Additionally, we identified several open tickets in

NotResp

- 2614246
- 2614253
- 2614255
- 2614297
- 2614299
- 2614303
- 2614304
- 2614305
- 2614307
- 2614309
- 2614310
- 2614311
- 2614313
- 2614316
- 2614317
- 2614318
- 2614319
- 2614320
- 2614321
- 2614322
- 2614323
- 2614324
- 2614325
- 2614326
- 2614328
- 2614329
- 2614330
- 2614331
- 2614332
- 2614327
- 2614333
- 2614334
- 2614335
- 2614336
- 2614337
- 2614338
- 2614339
- 2614340
- 2614341

Todd Coutts

Centers for Medicare & Medicaid Services

Office of Information Services

301-492-5139 (office) | (b)(6) (mobile) | todd.coutts1@cms.hhs.gov

7700 Wisconsin Ave Bethesda MD 20814 | Location: 9308

From: Schankweiler, Thomas W. (CMS/OIS)

Sent: Tuesday, November 26, 2013 12:41 PM

To: Coutts, Todd (CMS/OIS); Kane, David (CMS/OIS); Michael Finkel

Cc: Warren, Kevin (CMS/OIS); Fletcher, John A. (CMS/OIS); Van, Hung B. (CMS/OIS); Grothe, Kirk A. (CMS/OIS); Lyles, Darrin V. (CMS/OIS)

Subject: INC000002589982 Need details regarding

NotResp

Todd,

I would like to escalate this ticket NC000002589982 as being high risk on the defect list. I know that a bunch of security risk have recently appeared on the list but I wanted to let you know this one is considered high priority. In total we now have two tickets that are considered high priority. Contact me if you have any questions.

Thanks,

Tom

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]

Sent: Tuesday, November 26, 2013 10:52 AM

To: Schankweiler, Thomas W. (CMS/OIS); Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal); Alford, Justin (CGI Federal); Martin, Rich (CGI Federal)

Subject: RE: artf160711 / INC000002589982 Need details regarding NotResp

Hi Tom,

We promoted the code fix into production. Apparently the security enforcement is turned off.

The NotResp documents (notices) that are saved are not having the proper meta data populated to turn on the enforcements. So in addition to the fix that has been rolled in the following actions needs to occur.

1. Do a manual batch job to update the meta data for all the existing notices.
2. Have the developers fix the code so that any new notices that are saved has the proper metadata for enforcement.

These 2 action items are being coordinated internally right now. We don't have an ETA yet.

Thanks

Balaji M. Ramamoorthy

From: Schankweiler, Thomas W. (CMS/OIS) [mailto:thomas.schankweiler@cms.hhs.gov]

Sent: Tuesday, November 26, 2013 10:42 AM

To: Ramamoorthy, Balaji Manikandan (CGI Federal); Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: artf160711 / INC000002589982 Need details regarding NotResp

Balaji, Adam, and Kevin

I am looking for an update on this ticket. Can someone provide be a status of where we are with this item? Has it been corrected? Is the situation still occurring?

Thanks,

Tom

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]

Sent: Wednesday, November 06, 2013 12:39 PM

To: Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: RE: Need details regarding [NotResp]

Hi Adam,

There are multiple instances of [NotResp]. We expect [NotResp] guarantees for the uniqueness across [NotResp] We did go this route to see if there were duplicates.

So far the root cause has not been determined for the notices. In this particular instance we did see that the username were closely identical between the user1 and user2. There was a special character "-" at the end (and that was the only difference). We are also looking into the [NotResp] to see how it behaves and whether it has to be tweaked.

Thanks

Balaji M. Ramamoorthy

From: Willard, Adam (CMS/CTR) [mailto:Adam.Willard@cms.hhs.gov]

Sent: Wednesday, November 06, 2013 12:05 PM

To: Ramamoorthy, Balaji Manikandan (CGI Federal)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: RE: Need details regarding [NotResp]

Is [NotResp] just 1 instance or are there several instances in production? If there are multiple systems generating a [NotResp] there could be collisions.

What was the analysis from the Users who said they saw someone's Notice instead of theirs. Was there any check to see if the [NotResp] for that user and the other user was the same?

Adam Willard (Contractor)

703-354-2229 x513 (Direct)

(b)(6) (Mobile)

Adam.Willard@cms.hhs.gov

[NotResp]
CMS Security Team

Consumer Information & Insurance Systems Group (CIISG)

Centers for Medicare & Medicaid Services (CMS)

[NotResp]

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [balajimanikandan.ramamoorthy@cgifederal.com]

Sent: Wednesday, November 06, 2013 11:47 AM

To: Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: RE: Need details regarding [NotResp]

Hi Adam,

The eligibility notices are stored in [NotResp] and the [NotResp] for the notices are stored against the user record in

[NotResp]

The [NotResp] for the PDF document itself is generated by [NotResp] and it is sufficiently random.

We did identify this issue internally and it is in the list of high priority items to be fixed. I will track down on the ETA for the fix and let you know.

I agree that in the meantime to see if the rate control can be applied to this specific URL.

Thanks

Balaji M. Ramamoorthy

From: Willard, Adam (CMS/CTR) [mailto:Adam.Willard@cms.hhs.gov]

Sent: Wednesday, November 06, 2013 9:37 AM

To: Ramamoorthy, Balaji Manikandan (CGI Federal)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal)

Subject: Need details regarding [NotResp]

Importance: High

Balaji,

I noticed this morning that it is possible for anyone to run a [NotResp] healthcare.gov to obtain the results of their eligibility.

I need to know where you are grabbing the file from [NotResp] or something else). Is that system publicly accessible?

We need to know if there is anyway to put in permission checking of the workspace url [NotResp] against the list of possible [NotResp] for a user.

I sent Shima [NotResp] my eligibility URL and she was able to see my results in PDF format.

We are looking into a Rate Control for the [NotResp] to block or limit access to this screen if several attempts are made over X period of time.

Adam Willard (Contractor)

703-354-2229 x513 (Direct)

(b)(6) Mobile)

Adam.Willard@cms.hhs.gov

CMS [NotResp] Security Team

Consumer Information & Insurance Systems Group (CIISG)

Centers for Medicare & Medicaid Services (CMS)

[NotResp]

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
on behalf of [NotResp]
Sent: 11/26/2013 5:40:53 PM
To: Coutts, Todd (CMS/OIS); [NotResp]
[NotResp] Kane, David (CMS/OIS)
(David.Kane@cms.hhs.gov); [NotResp]
CC: [NotResp]
Warren, Kevin (CMS/OIS) (Kevin.Warren@cms.hhs.gov); [NotResp]
[NotResp] Fletcher, John A. (CMS/OIS) [NotResp]
[NotResp] Van, Hung B. (CMS/OIS) [NotResp]
[NotResp] Grothe, Kirk A.
(CMS/OIS) [NotResp]
[NotResp] Lyles, Darrin V. (CMS/OIS) (Darrin.Lyles@cms.hhs.gov)
[NotResp]
BCC: Burke, Sheila M. (CMS/OIS); [NotResp]
Subject: INC000002589982 Need details regarding [NotResp]

Todd,

I would like to escalate this ticket NC000002589982 as being high risk on the defect list. I know that a bunch of security risk have recently appeared on the list but I wanted to let you know this one is considered high priority. In total we now have two tickets that are considered high priority. Contact me if you have any questions.

Thanks,

Tom

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]
Sent: Tuesday, November 26, 2013 10:52 AM
To: Schankweiler, Thomas W. (CMS/OIS); Willard, Adam (CMS/CTR)
Cc: Warren, Kevin (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal); Alford, Justin (CGI Federal); Martin, Rich (CGI Federal)
Subject: RE: artf160711 / INC000002589982 Need details regarding [NotResp]

Hi Tom,

We promoted the code fix into production. Apparently the security enforcement is turned off.

The [NotResp] documents (notices) that are saved are not having the proper meta data populated to turn on the enforcements. So in addition to the fix that has been rolled in the following actions needs to occur.

1. Do a manual batch job to update the meta data for all the existing notices.
2. Have the developers fix the code so that any new notices that are saved has the proper metadata for enforcement.

These 2 action items are being coordinated internally right now. We don't have an ETA yet.

Thanks

Balaji M. Ramamoorthy

From: Schankweiler, Thomas W. (CMS/OIS) [mailto:thomas.schankweiler@cms.hhs.gov]

Sent: Tuesday, November 26, 2013 10:42 AM

To: Ramamoorthy, Balaji Manikandan (CGI Federal); Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: artf160711 / INC000002589982 Need details regarding [NotResp]

Balaji, Adam, and Kevin

I am looking for an update on this ticket. Can someone provide be a status of where we are with this item? Has it been corrected? Is the situation still occurring?

Thanks,

Tom

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [mailto:balajimanikandan.ramamoorthy@cgifederal.com]

Sent: Wednesday, November 06, 2013 12:39 PM

To: Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: RE: Need details regarding [NotResp]

Hi Adam,

There are multiple instances of [NotResp]. We expect [NotResp] guarantees for the uniqueness across [NotResp]. We did go this route to see if there were duplicates.

So far the root cause has not been determined for the notices. In this particular instance we did see that the username were closely identical between the user1 and user2. There was a special character "-" at the end (and that was the only difference). We are also looking into the [NotResp] to see how it behaves and whether it has to be tweaked.

Thanks

Balaji M. Ramamoorthy

From: Willard, Adam (CMS/CTR) [mailto:Adam.Willard@cms.hhs.gov]

Sent: Wednesday, November 06, 2013 12:05 PM

To: Ramamoorthy, Balaji Manikandan (CGI Federal)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: RE: Need details regarding [NotResp]

Is [NotResp] just 1 instance or are there several instances in production? If there are multiple systems generating a [NotResp] there could be collisions.

What was the analysis from the Users who said they saw someone's Notice instead of theirs. Was there any check to see if the [NotResp] for that user and the other user was the same?

Adam Willard (Contractor)
703-354-2229 x513 (Direct)
(b)(6) Mobile)
Adam.Willard@cms.hhs.gov

CM: NotR Security Team

Consumer Information & Insurance Systems Group (CIISG)
Centers for Medicare & Medicaid Services (CMS)

NotResp

From: Ramamoorthy, Balaji Manikandan (CGI Federal) [balajimanikandan.ramamoorthy@cgifederal.com]

Sent: Wednesday, November 06, 2013 11:47 AM

To: Willard, Adam (CMS/CTR)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal); Dhas, Navin (CGI Federal)

Subject: RE: Need details regarding NotResp

Hi Adam,

The eligibility notices are stored in NotResp and the URI's for the notices are stored against the user record in

NotResp

The NotResp or the PDF document itself is generated by NotResp and it is sufficiently random.

We did identify this issue internally and it is in the list of high priority items to be fixed. I will track down on the ETA for the fix and let you know.

I agree that in the meantime to see if the rate control can be applied to this specific URL.

Thanks

Balaji M. Ramamoorthy

From: Willard, Adam (CMS/CTR) [mailto:Adam.Willard@cms.hhs.gov]

Sent: Wednesday, November 06, 2013 9:37 AM

To: Ramamoorthy, Balaji Manikandan (CGI Federal)

Cc: Warren, Kevin (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Quaintance, Eric (CGI Federal)

Subject: Need details regarding NotResp

Importance: High

Balaji,

I noticed this morning that it is possible for anyone to run a NotResp healthcare.gov to obtain the results of their eligibility.

I need to know where you are grabbing the file from NotResp or something else). Is that system publicly accessible?

We need to know if there is anyway to put in permission checking of the workspace url NotResp against the list of possible NotResp or a user.

I sent Shima NotResp my eligibility URL and she was able to see my results in PDF format.

We are looking into a Rate Control for the NotResp p block or limit access to this screen if several attempts are made over X period of time.

Adam Willard (Contractor)
703-354-2229 x513 (Direct)
410-218-7352 (Mobile)
Adam.Willard@cms.hhs.gov

NotR
CMS esp Security Team
Consumer Information & Insurance Systems Group (CIISG)
Centers for Medicare & Medicaid Services (CMS)

NotResp

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
on behalf of [NotResp]
Sent: 11/13/2013 1:59:01 PM
To: [NotResp] Marantan, James (CMS/OIS) [NotResp]
[NotResp] Linares, George E. (CMS/OIS) [NotResp]
[NotResp] Fryer, Teresa M. (CMS/OIS) [NotResp]
[NotResp] Feuerberg, Lisa A. (CMS/OIS)
[NotResp]
CC: Cappelletti, John Danilo [john.cappelletti@noblis.org]
Subject: RE: HROB report for 11/7. draft as of 11/12, 5:15

I am looking at the 12c.doc version that was sent out password protected.

Updates:

- P. 3, last par. Change FFM contractors to Data Center contractors
- P4. A2- change action to "Researching"
- p.4 table 1 affected hosts, populate with data from Nov 8th scan report = [NotResp]
- p.6 – [NotResp] Scans. "Due to prioritization of work activities, CMS is focused during this first quarter on break-fix activities to ensure the marketplace is fully functional end to end. Refinements to improve [NotResp] cores is reviewed weekly. Future reports will describe any specific actions that are targeted for remediation."
- P6. Infrastructure Risk remains low. The security team is now focusing attention on cleanup of redundant firewall rules which will improve performance of the border firewall devices. No update to compliance at this time. Also may want to note that Red Seal data only changes twice a month.
- P7. "As a result 18 Category 5 [should be 6 not 5] incidents have been closed or reassigned as Category 1."
- P7. The first purple can stay; the second purple can be deleted, there were no new PII events during this week. (for the next week we may want to ask OESS to contribute a comment about their pending enhancements to the PII reporting process.
- P.8 section 2.4 recommend removing "formerly known as a Security Test and Evaluation (ST&E)," it adds no value to the report.
- P. 9 I have no feedback on the purple section
- P.10 remove from Acronym list CEO, [NotResp] ST&E because they don't appear in the body of the report.

Regards,

Tom

From: Steiner, Chip [mailto:frank.steiner@noblis.org]
Sent: Wednesday, November 13, 2013 5:54 AM
To: Marantan, James (CMS/OIS); Linares, George E. (CMS/OIS); Fryer, Teresa M. (CMS/OIS); Feuerberg, Lisa A. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)
Cc: Cappelletti, John Danilo
Subject: RE: HROB report for 11/7. draft as of 11/12, 5:15

We'll make these updates this morning and send out a revised copy for the morning call.

From: Marantan, James (CMS/OIS) [James.Marantan@cms.hhs.gov]

Sent: Tuesday, November 12, 2013 9:40 PM

To: Linares, George E. (CMS/OIS); Fryer, Teresa M. (CMS/OIS); Feuerberg, Lisa A.(CMS/OIS); Schankweiler, Thomas W. (CMS/OIS)

Cc: Steiner, Chip

Subject: RE: HROB report for 11/7. draft as of 11/12, 5:15

A2 - This issue is still open based on our analysis. Additional information regarding this vulnerability was sent earlier this morning.

A3-A5 - Tom's team has access to NotResp and Incident Management tickets and I believe he has been providing the updates to those sections. He should have more insight as to what has changed or has not changed in the environment.

From: Linares, George E. (CMS/OIS)

Sent: Tuesday, November 12, 2013 9:34 PM

To: Fryer, Teresa M. (CMS/OIS); Feuerberg, Lisa A.(CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Marantan, James (CMS/OIS)

Cc: 'frank.steiner@noblis.org'

Subject: Re: HROB report for 11/7. draft as of 11/12, 5:15

You are correct, the monitor is happening for all systems regardless of FFM. The only thing that we are saying is that for the weekly reporting purposes, we are focusing on ffm only. The decision memo clearly states the boundaries to ffm, e&e, fm and pm and for sca purposes that's the system boundary as well. So would be staying consistent there. We can review the decision memo and discuss this further, but I am just going with what's on the decision memo as to what the boundaries and scope for reporting purposes.

The report as is becoming extremely difficult to manage as well as getting all the information timely.

George Linares

Office of Information Services

Centers for Medicare & Medicaid Services

----- Sent using BlackBerry -----

From: Fryer, Teresa M. (CMS/OIS)

Sent: Tuesday, November 12, 2013 09:17 PM

To: Linares, George E. (CMS/OIS); Feuerberg, Lisa A.(CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Marantan, James (CMS/OIS)

Cc: Steiner, Chip <frank.steiner@noblis.org>

Subject: RE: HROB report for 11/7. draft as of 11/12, 5:15

Stating for the record that we did not agree that only www.healthcare.gov/marketplace and [https://www.cuidadodesalud.gov](http://www.cuidadodesalud.gov) should be included in the report. As stated previously all external web facing marketplace servers are being scanned and if vulnerabilities found, could lead to FFM systems being exploited. The action was to "Monitor and perform weekly testing of all border devices, including internet facing web servers". It did

not specifically state only the healthcare.gov website. All the sites being scanned are FFM related systems, so to state they were non-FFM systems is incorrect.

Teresa

Teresa Fryer, CISSP, HCISPP, CIPP/G
Chief Information Security Officer and
Director, Enterprise Information Security Group (EISG)
Centers for Medicare & Medicaid Services
Office of Information Services (OIS)
7500 Security Blvd, N1-26-18
Baltimore, MD 21244
410-786-2614 (W)
(b)(6) (C)
teresa.fryer@cms.hhs.gov

From: Linares, George E. (CMS/OIS)
Sent: Tuesday, November 12, 2013 8:42 PM
To: Cappelletti, John Danilo; Feuerberg, Lisa A.(CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Marantan, James (CMS/OIS); Fryer, Teresa M. (CMS/OIS)
Cc: Steiner, Chip
Subject: RE: HROB report for 11/7. draft as of 11/12, 5:15
Here are my comments

- Please add Acting to my title
- Page 4 Results - Remove Table 1 and change paragraph something like this and add caveat of s follows: During this reporting period, penetration testing of Internet-facing Web servers identified no vulnerabilities within FFM. However, during the prior reporting period one High and several Moderate vulnerabilities that were determined to be potentially exploitable were identified for non-FFM systems. In addition, five low... ... Starting with this reporting period, only FFM related vulnerabilities will be included.
-
- A2 - please add caveat, that since this is data center metrics that some non-ffm systems have been included
- A6 - leave it as is

James and Teresa, comments A2-A5 require your input

Thanks

From: Cappelletti, John Danilo [john.cappelletti@noblis.org]
Sent: Tuesday, November 12, 2013 5:18 PM
To: Feuerberg, Lisa A.(CMS/OIS); Linares, George E. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Marantan, James (CMS/OIS); Fryer, Teresa M. (CMS/OIS)
Cc: Steiner, Chip; Cappelletti, John Danilo
Subject: [WARNING : MESSAGE ENCRYPTED] HROB report for 11/7. draft as of 11/12, 5:15
Lisa, et al.:

This version has a number of updates, as discussed and presented further below. The following two sections are in most need of refinement / additional information:

- Section 2.3 Continuous Monitoring
- Section 2.2 Border Testing
- Executive summary once the above are refined

Updates include:

- Refined the assets being tested and monitored to only those pertaining to FFM per our discussion today. These specifically include www.healthcare.gov/marketplace and <https://www.cuidadodesalud.gov>. And the five mentinoed FFM systems.
- Updated the vulnerabilities listed in Table 5 per the email from Hank.
- Included some of the updates from Corey in NotR
esp migration.
- Added specific dates to SCA testing.

Lisa, we'll give you a call to discuss the needed additional information.

Regards,

John

PS: we have our documentation specialist cleaning up the acronym list presently

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
 [NotResp]
 on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 6/7/2013 11:55:26 AM
To: Lyles, Darrin V. (CMS/OIS) (Darrin.Lyles@cms.hhs.gov) [NotResp]
 [NotResp]
CC: Brackett, Stacie D. (CMS/CCIIO) [NotResp]
 [NotResp]
Subject: FW: Private Plan Data Finder / HealthCare.gov

FYI, in regards to healthcare.gov and plan finder

>-----Original Message-----

>From: Mellor, Michael (CMS/OIS)
 >Sent: Friday, June 07, 2013 7:40 AM
 >To: Chao, Henry (CMS/OIS); Trenkle, Tony (CMS/OIS)
 >Cc: Fryer, Teresa M. (CMS/OIS); Schankweiler, Thomas W. (CMS/OIS);
 >Outerbridge, Monique (CMS/OIS); Grothe, Kirk A. (CMS/OIS); Linares, George
 >E. (CMS/OIS); Schreiber, Frank (CMS/OIS); Marantan, James (CMS/OIS)
 >Subject: Re: Private Plan Data Finder / HealthCare.gov

>Henry - I will be in meetings all day today in DC. Frank Schreiber is the acting
 >EISG director today and he can assist your staff with this. James Marantan is
 >also available. Let us know how we can help.

>
 >_____
 >Sent from my Wireless Device

>----- Original Message -----

>From: Chao, Henry (CMS/OIS)
 >Sent: Thursday, June 06, 2013 11:04 PM
 >To: Booth, Jon G. (CMS/OC); Trenkle, Tony (CMS/OIS)
 >Cc: Wallace, Mary H. (CMS/OC); Fryer, Teresa M. (CMS/OIS); Mellor, Michael
 >(CMS/OIS); Schankweiler, Thomas W. (CMS/OIS); Outerbridge, Monique
 >(CMS/OIS); Grothe, Kirk A. (CMS/OIS); Kerr, James T. (CMS/CMHPO); Snyder,
 >Michelle (CMS/OA); Bowen, Marianne (CMS/OA); Serio, Lois M. (CMS/OPE);
 >Armstead, Andrea E. (CMS/OA); Linares, George E. (CMS/OIS)
 >Subject: Re: Private Plan Data Finder / HealthCare.gov

>Tony,
 >
 >Jon and I talked this evening and will work closely with EISG to make sure the
 >least risk option that is politically acceptable is chosen.

>
 >I think if we can meet with Jon tomorrow and document the issue and briefly
 >outline the options (there are only about 2 feasible options given the
 >impending rollout of the Marketplace Portal/hc.gov) we can quickly come to
 >agreement and start work even as early as tomorrow evening.

>Thanks.

>
 >Henry Chao
 >Deputy Chief Information Officer and Deputy Director Office of Information
 >Services Centers for Medicare & Medicaid Services
 >7500 Security Blvd
 >Baltimore, MD 21244
 >301-492-4100 (Pri)
 >410-786-1800 (Alt)
 >(b)(6) (BB)

>----- Original Message -----

>From: Booth, Jon G. (CMS/OC)
 >Sent: Thursday, June 06, 2013 10:47 PM
 >To: Trenkle, Tony (CMS/OIS)
 >Cc: Chao, Henry (CMS/OIS); Wallace, Mary H. (CMS/OC); Fryer, Teresa M.
 >(CMS/OIS)

>Subject: Private Plan Data Finder / HealthCare.gov
>
>Tony,
>
>We've been working with CCIIO on what has become an urgent issue. When
>we relaunch healthcare.gov on June 21, the current private plan finder
>currently hosted at finder.healthcare.gov was slated to be shutdown. On that
>date, we were going to transition to hosting the plan data on
>data.healthcare.gov. However, based on recent meetings with CCIIO staff and
>leadership, we have learned that this won't work and that without a web
>application front-end, the private plan data (particularly the plan rates) will not
>be available. This means we will be out of compliance with the statutes
>governing public access to this data.
>
>We are scrambling to come up with a solution to keep this plan data online.
>Here is our proposed short-term solution, at a high level:
>- take over the current plan finder application from ASPA; migrate the current
>code base from ASPA to CMS
>- run this application "as is" with no modifications other than changing the
>header and footer to match the new healthcare.gov
>- in parallel, begin rewriting a system to CMS standards (see below) that
>would take the place of the ASPA code - we would run this rewrite through
>the XLC process
>- launch the CMS-developed plan finder tool and retire the ASPA system
>
>A few notes on the above:
>- we are investigating the feasibility of hosting this in Terremark - it appears
>that this is a possibility
>- the current ASPA system is written in NotResp - our rewrite of the
>system would be done in CMS standard frameworks
>- the ASPA system does have a current ATO and has undergone an SCA
>- this is a low volume system and will be even lower when we relaunch on the
>21st - we need to keep this system online but will not be promoting its
>availability
>
>The other alternatives we have explored are:
>- posting only the plan data with no rates (not politically acceptable; does not
>meet legal requirements)
>- having ASPA continue to host the plan finder (not affordable - ASPA has
>indicated that they would charge CMS several million dollars for this support)
>- having CGI, under OC's contract, host the ASPA code in their Fedramp
>certified cloud data center on a temporary basis
>
>I am happy to provide additional details on this and to provide this as a formal
>proposal.
>
>I know this is short notice, but would you have any time to meet on this
>tomorrow? In order to meet the transition deadline of 6/21, we need to begin
>work on the interim solution this weekend.
>
>I apologize for the late notice on this. Your guidance is greatly appreciated.
>
>Thanks,
>
>Jon

Message

From: Schankweiler, Thomas W. (CMS/OIS) [NotResp]
[NotResp]
on behalf of Schankweiler, Thomas W. (CMS/OIS)
Sent: 6/18/2013 11:27:13 AM
To: England-Gordon, John E. (CMS/OIS) [NotResp]
[NotResp] Jun, Eva T. [ejun@mitre.org]
CC: Nebolsine, Samantha L. (CMS/OIS) [NotResp]
[NotResp]
Subject: Agreements Discussions
Attachments: QHP New Master Agreement 05022013.docx; Preamble + Regulation text CLEAN 05072013.docx; Policy FAQs 4-25-13.docx; IO Task 5_Privacy_Webinar_Slides_05 03 2013_FINAL.pptx; index_health_reform_section_exchanges_reg_summary_chart.pdf; FFE_Direct_Enrollment_API_Spec_V1_3_20130510.docx; DSH_INT_Requester Onboarding.docx; agent-broker-5-1-2013.pdf; Agent-broker FAQ_Master_041713.docx; 2013 0515_Web-broker Agreement_final.pdf

Eva, John, and Samantha,

Attached is my one note file

Agreements Discussions

Monday, May 06, 2013
9:48 AM

Staff

The team working on the security/privacy legal framework, and the agreements consists of:

Peter Nakahata, CCIIO
Julia Cassidy Esq., CCIIO
Karen Mandelbaum, CCIIO
Donna Fickett, Mitre
Maribel Franey, OEM (part-time)
Tom Schankweiler, OIS/CIISG
John Gordon, OIS/CIISG (part time)
Eva Jun, MITRE
Aaron Wesolowski (part time)
Rogelyn McLean, Esq., HHS OS/OGC - Primary (out on maternity leave)
Egan, Lynn Esq. HHS/OGC – covering for Rogelyn
Burke, Sherry Lynn Esq. HHS/OGC – covering for Rogelyn
Laura Schattschneider, Esq., HHS OGC (part-time)

For QHP Issuer agreement discussion the following people are involved

Beth Parish, CCIIO
Rochel Schnur, CCIIO
Joy Kraybill, CCIIO
Lorraine Doo, CMS/OEM
Kevin Stewart, CMS/OEM
Theo Willis, CMS/OEM
Ellen Ambrosini, CMS/OEM
Jessica Slater, CMS/OEM

Link to CCIIO Regulations

<http://www.cciio.cms.gov/resources/regulations/index.html>

Exchange Final Rule (Summary Chart) provided by NAIC via their website

<<index_health_reform_section_exchanges_reg_summary_chart.pdf>>

| | |
|---|--|
| §155.260-Privacy and security of information | <p>An Exchange must apply appropriate security and privacy protections when collecting, using, disclosing or disposing of personally identifiable information it collects. Personally identifiable information is information that, alone or when combined with other personal or identifying information which is linked or linkable to a specific individual, can reasonably be used to distinguish or trace an individual's identity.</p> <p>The collection, use, and disclosure of personally identifiable information is limited to what is specifically required by:</p> <ul style="list-style-type: none">• This section;• Other applicable law;• <u>Subpart E</u> of this regulation (dealing with enrollment of individuals in individual market QHPs);• Standards established in accordance with §155.200(c); or• Section 1942(b) of the [Social Security] Act (dealing with information required for Medicaid and CHIP eligibility determinations). <p><i>Exchanges may not collect, use or disclose personally identifiable information if prohibited by another law. HHS invites comments as to whether and how it should restrict the method of disposal in this section as well.</i></p> <p><i>Each Exchange should conduct analysis of its operations and functions and determine its HIPAA status and must comply with HIPAA privacy requirements if it is a HIPA covered entity. Regardless of this analysis, each Exchange must implement safeguards to ensure that any and all personally identifiable information received, used, stored, transferred, or prepared for disposal by an Exchange is subject to adequate privacy and security protections.</i></p> <p>Exchange security standards must be consistent with HIPAA security rules, and must be applied to sub-contractors through contractual requirements.</p> |
|---|--|

(New Preamble Text) provided by Karen on 5/9

<<Preamble + Regulation text CLEAN 05072013.docx>>

(b)(5)

(b)(5)

155.280 - Allows for collection of Oversight and Monitoring documents
(at a minimum the third-party assessment report against MARS-E)
PRA=150K to develop and submit this document...
This decision needs to go into our Oversight and Monitoring guidance.

155.26(b) Functions have to be laid out in the agreement

QHP Issuer Agreement

PART A- Draft Markup

<<QHP New Master Agreement 05022013.docx>>

QHP Issuers Training Slides -

Plan Management - they submit their product and get validation from DOI

Later phases the QHP will get information regarding e&e; plus they can do direct enrollment

Issuers will have a lot of data!

Below is a [IO Task-5...]Privacy presentation to issuers to be delivered next week, deck was provided by Karen on 5/9

<<IO Task 5_Privacy_Webinar_Slides_05 03 2013_FINAL.pptx>>

Web Broker Agreement (e-health, multiple plans multiple states etc.. .clearing house)

Web brokers will be using their own systems to retrieve data

Final agreement, released May 13, 2013

<<2013 0515_Web-broker Agreement_final.pdf>>

FFE Direct Enrollment API

<<FFE_Direct_Enrollment_API_Spec_V1_3_20130510.docx>>

Enrollment Request document

<<DSH_INT_Requester Onboarding.docx>>

Agent/Broker -a/b has to work through a QHP Issuer, here the Issuer appoints (appointment) an a/b to assist with e&e.

a/b FAQ

<<Agent-broker FAQ_Master_041713.docx>>

<<Policy FAQs 4-25-13.docx>>

Roles of the Agent Broker (collected on 5/9 from Julia Cassidy)

<<agent-broker-5-1-2013.pdf>>

A/B training - BAH training

1. CMS provides the BAH training (including test, questions); then they attest that they comply
2. Must get an appointment from the issuer, to ensure licensure with the state, and they will confirm they are licensed to sell in the state. That information is kept at the ISSUER website, CMS has delegated that trust. Unique number is then issued a number from CMS. (go see the enrollment process).

Navigator Agreement -

Will be under grant agreements - 155.260 b(2) policy affects the community.

These links may not work anymore. Contact Joy Kraybill

CAC Agreements

Number of Non-Exchange Agreements (NEA)- [Updated list on 6/17/2013]

1. Issuers Agent/Brokers
 - o Health Plans and QHP's
2. Web Broker Individual (and Traditional?)
 - o Web-Brokers - TPA to get a hub partner ID (coming in through the API/EDI)
 - o Services Individual and Shop Markets
 - o TPA only?
3. Navigator, and In-person assistors (both get grant money)
 - o Person needs to sign a consent form
 - o No data is held beyond that session other than the consent form
 - o Supposed to be face-to-face, or over the phone
 - o Helps an individual enroll, but they do not help the individual select a plan
 - o Required terms and conditions they will need to be put into their grant information
 - Grant language needs to be in alignment in the
 - o Required to take training, including a check box to note
 - o Reasonable expectation to perform business, such as basic contact information for the purpose of setting up an initial appointment only, not for follow up
4. CAC and side-by-side assistor (volunteers)

Individual A/B look and feel

Creating a Common Appendix - From 6/17 meeting

1. Issuer A/B NEA, only
 - o For QHP Health Plans
 - o Mars-E by reference, only first 3 volumes
2. Web Brokers
 - o Traditional and individual A/B
 - o Web-Broker Trading Partner Agreement (Appendix)
3. Navigator
 - o For people under grants
 - o Implement Principles of MARS-E, reference specific controls?
4. Assistors
 - o Certified Application Councilor, no grant money, just training
 - o For people not under grants, side by side assistance, may use community computers
 - o Issue a Manual not an agreement?

5/9 mtg - Actions

Karen - A placeholder is in the PRA = 150K

Question: What are the functions of the QHP issuer?

Tom - Get functions of the QHP issuers? (get from Mark Oh)

See Kristi's list for the web-broker (functions, need to talk with Mark Oh)

How to write this (Section B) : General statement then a table [Function | Element]. This agreement assists applicants in completing (XXX) and contemplate they a/b may receive this information for the purpose of ... and the issuer is

Function - data elements (including not limited to) - purpose is limited.

Karen - to provide Tom a hardcopy of the 155 document

Training -

QHP Issuer Training - Focus on Security, as the current for Privacy.

BAH has done the compliance training (IT, Compliance, and Legal)

FAQ Conflicts: with 155, stating the information collected does not need to just be limited to ACA. (wide verbiage) - (for efficient use of the exchange) - Revised use of 155.260!

Issuer is prohibited from using this for any other purpose.

Karen - Will update the Notices with a Privacy Statement (due next week to CCIO), and will add a note to check healthcare.gov for more information on CMS Security and Privacy protections

Created with Microsoft OneNote 2010

One place for all your notes and information

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
Center for Consumer Information and Insurance Oversight
200 Independence Avenue SW
Washington, DC 20201



**AGREEMENT BETWEEN
WEB-BROKERS AND
THE CENTERS FOR MEDICARE & MEDICAID SERVICES ("CMS")**

THIS WEB-BROKER AGREEMENT ("AGREEMENT") IS ENTERED INTO by and between THE CENTERS FOR MEDICARE & MEDICAID SERVICES ("CMS"), as the party responsible for the management and oversight of the Federally-facilitated Exchange ("FFE") and the CMS Data Services Hub ("Hub"), and an agent or broker that uses a non-FFE internet web site to assist Consumers, Applicants, and Enrollees in applying for advance payments of premium tax credits ("APTCs") and cost-sharing reductions ("CSRs") for Qualified Health Plans ("QHPs"), and/or in completing enrollment in QHPs offered in the individual market through the FFE (hereinafter referred to as "Web-broker").

1. Purpose and Scope.

- a. Web-brokers may assist Consumers, Applicants and Enrollees in: (1) applying for health care coverage under a QHP offered through the FFE; (2) applying for APTCs and CSRs; and/or (3) completing enrollment in a QHP through its web site for individual market coverage. An enrollment through the FFE is achieved if the Web-broker either directs a Consumer, Applicant, or Enrollee to file an application with the FFE, or ensures that a Consumer, Applicant, or Enrollee receives an eligibility determination for coverage through the FFE website.
- b. To facilitate the enrollment process, CMS will provide centralized and standardized business and technical services ("Hub Web Services") to Web-brokers that will enable Web-brokers to establish a secure connection with the Hub.
- c. Should a Web-broker choose to provide enrollment services using CMS' Hub Web Services, the Web-broker's access to the Hub and use of Hub Web Services are subject to the terms of this Agreement.

2. Definitions.¹

- a. *Agent or broker*: Has the meaning set forth in 45 CFR 155.20.
- b. *CMS Data Services Hub ("Hub")*: As defined for the purposes of this Agreement, the federal service managed by CMS to transmit data between federal and state entities that administer Insurance Affordability Programs (e.g., a state Medicaid agency, a state children's health insurance program (CHIP), a state basic health program (BHP), or an Exchange) to interface with federal agency partners, including, but not limited to the Internal Revenue Service, Social Security Administration, and Department of Homeland Security.
- c. *CMS Data Services Hub Web Services ("Hub Web Services")*: As defined for the purposes of this Agreement, business and technical services made available by CMS to enable the determination of certain eligibility and enrollment data through the FFE website, including the collection of personal and financial information necessary for Consumer, Applicant or

¹ Terms in this paragraph are defined pursuant to federal regulations, and are subject to change through future rulemaking.

Enrollee account creations, QHP application submissions, and Insurance Affordability Program eligibility determinations.

- d. *Consumer or Applicant*: As defined for the purposes of this Agreement, a person who, for himself or herself, or on behalf of another individual, seeks from the Web-broker information related to eligibility for FFE participation or coverage under a QHP or other Insurance Affordability Program, or whom the Web-broker assists in applying for FFE participation, health care coverage under a QHP, applying for APTCs and CSRs, and/or completing enrollment in a QHP through its web site for individual market coverage.
- e. *Enrollee*: As defined for the purposes of this Agreement, an individual enrolled in a QHP or other Insurance Affordability Program.
- f. *Federally-facilitated Exchange ("FFE")*: As defined for the purposes of this Agreement, an Exchange established by HHS and operated by CMS under Section 1321(c)(1) of the Affordable Care Act for individual market coverage.
- g. *Insurance Affordability Program*: Has the meaning set forth in 45 CFR 155.300.
- h. *Minimum Acceptable Risk Standards—Exchanges ("MARS-E")*:² As defined for the purposes of this Agreement, a CMS-published suite of documents that define the security standards required pursuant to 45 CFR 155.260 and 45 CFR 155.270, for any Exchange, individual, or entity gaining access to information submitted to an Exchange or through an Exchange using a direct, system-to-system connection to the CMS Hub.
- i. *Personally identifiable information ("PII")*: Has the meaning contained in OMB Memoranda M-07-16 and M-10-22 — “information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.”
- j. *Qualified Health Plan (QHP)*: Has the meaning set forth in 45 CFR 155.20.
- k. *Web-broker*: An agent or broker that uses a non-FFE internet web site to assist Consumers, Applicants, and Enrollees in the QHP selection and enrollment process as described in 45 CFR 155.220(c).

3. Terms and Conditions.

- a. Term. The term of this Agreement begins on the dates signed by the Web-broker and CMS, and ends September 30, 2014, after which this Agreement may be renewed for a subsequent period subject to CMS’ discretion.
- b. Authority. CMS enters into this Agreement pursuant to its authority under 45 CFR 155.220 and the CMS System of Records Notice, “CMS Health Insurance Exchanges System (HIX), CMS System No. 09-70-0560” (the SORN).³ Under the terms of the SORN, Routine Use No. 8, CMS will provide PII to Web-brokers for the purpose of filing applications for coverage under QHPs and other Insurance Affordability Programs, when relevant and necessary to determine eligibility to enroll in a QHP or in another Insurance Affordability Program.
- c. Compliance with Agreement. Web-broker acknowledges and agrees that its relationship with the FFE is contingent upon compliance with the terms of this Agreement and any applicable existing and future laws, statutes, and regulations as of their effective dates, including but not limited to the following:
 - i. All applicable state laws related to agents and brokers in each state in which Web-broker operates, including but not limited to:
 - 1. Maintaining valid licensure in every state that Web-broker offers QHPs through the FFE;

² Available at <http://www.cciio.cms.gov/resources/regulations/index.html>

³ 78 Federal Register 8538, March 6, 2013.

2. Ensuring Web-brokers' employees, contractors, agents, or representatives who assist Consumers, Applicants, and Enrollees with QHP enrollment in a particular state are licensed in that state;
 3. Compliance with state laws related to appointments, as a condition of enrolling Consumers, Applicants, and Enrollees in QHPs through the FFE.
- ii. The Affordable Care Act and all applicable current and future regulations and guidance, including
1. Requirements set forth in 45 CFR 155.220(c)(3);
 2. Registration and training requirements set forth in 45 CFR 155.220(d) for Web-broker and Web-brokers' employees that assist Consumers, Applicants and Enrollees in eligibility applications or enrollment in QHPs through the FFE;
 3. All other applicable federal laws, including the Health Insurance Portability and Accountability Act (HIPAA), Section 6103(b)(2) of the Internal Revenue Code, the Federal Privacy Act, and the Federal Information Security Management Act;
 4. Ensuring Web-brokers' employees, contractors, agents, or representatives that may access data and PII Web-broker receives from the Hub, comply with minimum FFE privacy and security standards pursuant to 45 CFR 155.260; and
 5. In accordance with future regulations and guidance, prominently displaying language that notifies Consumers, Applicants, and Enrollees that Web-broker has entered into this Agreement with CMS, and has agreed to conform to web site display, privacy, and security standards of the FFE.
- d. Amendment of Agreement. Web-broker acknowledges that during the term of this Agreement, CMS may amend this Agreement to incorporate any additional standards required by statute and any regulations or policies implementing or interpreting such statutory provisions. Notwithstanding the foregoing, should there be any conflict or inconsistency between the standards and obligations in this Agreement and any statutory, regulatory, or sub-regulatory guidance released by CMS, Web-broker must comply with the statutory, regulatory, and sub-regulatory standards released by CMS.
- e. FFE Privacy and Security Policy. Web-broker agrees that as a condition of this Agreement, it will implement and comply with all existing and future privacy and security standards adopted by the FFE, and any sub-regulatory guidance issued or published by CMS as it relates to those privacy and security requirements.
- i. Web-broker agrees that, as a condition of this Agreement, it will require its employees, contractors, agents or representatives who collect PII from Consumers, Applicants, or Enrollees, to use, disclose or gain access to PII provided by the FFE through the Hub, or otherwise assist Consumers, Applicants, or Enrollees, with obtaining eligibility determinations or enrolling in Insurance Affordability Programs, to comply with FFE or CMS privacy and security standards and any privacy and security standards that Web-broker must or may implement to comply with the terms and conditions of this Agreement, including but not limited to:
 1. Proper and timely destruction of PII;
 2. Record-keeping requirements for PII collection, creation, use, and disclosure;
 3. Sufficient training in all FFE and CMS privacy and security standards for Web-broker's employees, contractors, agents or representatives, who may come into contact with PII or other information provided by a Consumer, an Applicant, or an Enrollee or from the Hub; and

4. Appropriate actions against any employee, contractor, agent or representative who fails to comply with the applicable privacy and security standards.
- ii. Security and Technical Standards. Web-broker agrees to comply with all current and future FFE and CMS technical, security, management, and control requirements, including but not limited to *MARS-E* requirements associated with the implementation and usage of information exchanged through the Hub.
- iii. Data Received. Subject to the terms and conditions of this agreement and applicable laws, in performing the tasks contemplated under this Agreement, Web-broker may collect and/or access the following data and PII of an applicant, including but not limited to:

| Category | Description ⁴ |
|-------------------------------------|--|
| Personally Identifiable Information | APTC percentage and amount applied Auto disenrollment information Applicant Name Applicant Address Applicant Birthdate Applicant Telephone number Applicant Email Applicant spoken and written language preference Applicant Medicaid Eligibility indicator, start and end dates Applicant Children's Health Insurance Program eligibility indicator, start and end dates Applicant QHP eligibility indicator, start and end dates Applicant APTC percentage and amount applied eligibility indicator, start and end dates Applicant Maximum APTC amount Applicant CSR eligibility indicator, start and end dates Applicant CSR level Applicant QHP eligibility status change Applicant APTC eligibility status change Applicant CSR eligibility status change Applicant Initial or Annual Open Enrollment Indicator, start and end dates Applicant Special Enrollment Period eligibility indicator and reason code Contact Name Contact Address Contact Birthdate Contact Telephone number Contact Email Contact spoken and written language preference Enrollment group history (past six months) Enrollment type period FFE Applicant ID FFE Member ID Issuer Member ID Net premium amount Premium Amount, start and end dates Special enrollment period reason Subscriber Indicator and relationship to subscriber Tobacco use indicator and last date of tobacco use |
| Affordable Care Act Program Data | Any QHP data provided to the Web-broker by the FFE, including benefit, rate factors, premium, cost-sharing, service area, and quality rating data |

⁴ Consistent with section 1411(b)(1) of the Affordable Care Act, the applicant information fields listed in this table also includes the personally identifiable information of other individuals on whose behalf an applicant seeks coverage.

- iv. Permissible Uses and Disclosures. Web-broker shall use or disclose the data/PII it receives from Consumers, Applicants, Enrollees, or the Hub, only to perform the specific functions expressly authorized in this Agreement, including:
 - 1. Display of all QHPs available through the FFE;
 - 2. Support the selection of a QHP and the enrollment in a QHP;
 - 3. Facilitation of the application for and the receipt of APTCs, and the collection of standardized attestations acknowledging the receipt of the APTC determination, if applicable;
 - 4. Inform Consumers, Applicants, or Enrollees of eligibility for Medicaid or Children's Health Insurance Program (CHIP);
 - 5. Transmission of information about the Consumer, Applicant, or Enrollee's decisions regarding QHP enrollment and/or CSR and APTC information from the Web-broker's web site to the FFE;
 - 6. Facilitation of payment of the initial premium amount;
 - 7. Support of an Enrollee's ability to disenroll from a QHP;
 - 8. Facilitation of an Enrollee's ability to report changes in eligibility status to the FFE;
 - 9. Maintenance of an electronic record of information related to health care coverage enrollment activity on the Web-broker's web site for a period of 10 years.
 - v. Restrictions on Use. Pursuant to 1411(g), Web-broker agrees that it, and any of its employees, contractors, agents or representatives to whom it discloses the data/PII it receives from the Consumers, Applicants, or Enrollees, or the Hub, may use such information only for the purposes of, and to the extent necessary, in verifying the eligibility of Consumers, Applicants, or Enrollees to enroll in a QHP, or for Consumers, Applicants, or Enrollees to claim an APTC or CSR or obtain the amount of the APTC or CSR. Web-broker shall implement and use appropriate safeguards to protect the data/PII from misuse or inappropriate disclosure and to prevent any use or disclosure of the data/PII other than as provided for in this Agreement, or as otherwise required by law or regulation.
 - vi. Civil Penalties for Unauthorized Use or Disclosure of Information. If Web-broker knowingly and willfully uses or discloses any Consumer's, Applicant's, or Enrollee's PII, including citizenship or immigration status, social security number, or personal income information, for purposes not authorized by a law, regulation, or this Agreement, in violation of section 1411(g) of the Affordable Care Act, Web-broker may be subject to a civil penalty of not more than \$25,000 per person or entity, per use or disclosure, in addition to other penalties that may be prescribed by law.
 - vii. Survival. Web-broker's duty to protect and maintain the privacy and security of PII under this Agreement shall survive the termination of this Agreement.
 - f. Compensation. CMS will not compensate Web-broker for any service it provides to Consumers, Applicants, and Enrollees in the FFE.
4. Termination.
- a. Right to Termination without Cause. Web-broker may terminate this Agreement at any time, without cause, by complying with the termination standards adopted by the FFE.

- b. Termination with Cause. At its sole discretion, CMS may revoke Web-broker's access to the Hub or terminate this Agreement and Web-broker's relationship with the FFE, with or without notice, at any time, in accordance with the standards adopted by the FFE, if CMS determines that Web-broker materially breached any term of this Agreement or applicable laws, including but not limited to potential unlawful use or disclosure of PII, or to protect the security and integrity of the Hub or other FFE-related information systems.
 - c. Opportunity to Cure. Upon notice of revocation or termination from CMS, Web-broker agrees to correct any breach of this Agreement through good-faith negotiation with, and to the satisfaction of CMS, in accordance with the standards adopted by the FFE.
 - d. Reconsideration of Revocation or Termination. Web-broker shall comply with the standards adopted by the FFE when requesting reconsideration or appeal of any action taken by CMS to revoke access to the Hub or terminate this Agreement.
5. Representations and Warranties. Web-broker agrees that by utilizing the Hub, it accepts risks associated with the sharing of information and data between CMS and Web-broker, and shall not hold CMS responsible for any resulting damages or losses. CMS does not provide any warranty or guarantee regarding the timeliness, accuracy, efficacy, or technology capabilities of any transactions involving the Hub.

Appendix A: Web-broker Best Practices for the FFE Individual Market

CMS acknowledges that Web-brokers will provide a critical service in assisting Consumers, Applicants, or Enrollees⁵ in obtaining healthcare coverage through Qualified Health Plans (“QHPs”), with applying for advance payments of premium tax credit (“APTCs”) and cost-sharing reductions (“CSRs”) for Qualified Health Plans (“QHPs”), and/or completing enrollment in QHPs through the FFE. Accordingly, CMS has identified the following best practices applicable to Web-brokers and Web-broker’s employees, agents, contractors, and representatives assisting Consumers, Applicants, or Enrollees with individual market coverage through the FFE:

1. Offer a QHP plan selection process on Web-broker’s web site that does not display sponsored links or paid advertising related to health insurance products for the FFE individual market;
2. Offer non-QHP health plans or non-QHP ancillary products on a separate web page from the QHP web pages (notwithstanding the fact that Consumers, Applicants, or Enrollees may search for non-QHP health plans in a separate page of Web-broker’s web site other than QHP web pages);
3. If the web-broker is not appointed by every QHP issuer offering a QHP in a state, prominently display language that notifies Consumers, Applicants, or Enrollees that the Web-broker is not appointed with every QHP displayed on its web site;
4. If a Consumer, Applicant, or Enrollee expresses desire to enroll in a QHP for which Web-broker is not appointed by the QHP issuer as required by state law, direct them to the FFE;
5. Communicate to Consumers, Applicants, or Enrollees that they are not required to receive assistance from the Web-broker to enroll in a QHP, and that they can receive information about all available QHPs through the FFE;
6. Act in the best interest of Consumers, Applicants, or Enrollees when presenting QHP options based upon the preferences and needs of the Consumers, Applicants, or Enrollees, regardless of the compensation or appointment relationship between the Web-broker and issuers;
7. Refrain from steering a Consumer, Applicant, or Enrollee to a particular QHP based on financial or other non-financial factors that do not reflect Consumer, Applicant, or Enrollee preferences;
8. Assist all members of a family, including individuals who are ultimately determined eligible for Medicaid or the Children’s Health Insurance Program (CHIP), and refer individuals who are determined eligible for Medicaid or CHIP to the appropriate resources;
9. If Web-broker or Web-broker’s employees’ licenses are revoked by state licensing entity, notify CMS of the license revocation in a timely manner;
10. If Web-broker elects to terminate its relationship with the FFE without cause, either notify the Consumers, Applicants, or Enrollees as of the date of the termination notice or complete the assistance for the Consumers, Applicants, or Enrollees.

⁵ These terms have the meaning set forth in the “Definitions” section of the “Agreement between Web-Brokers and the Centers for Medicare and Medicaid.”

**This “Agreement between Web-Brokers and the Centers for Medicare & Medicaid Services”
has been signed by:**

FOR THE WEB-BROKER

**The undersigned is an official of Web-broker who is authorized to represent and bind the
Web-broker for purposes of this Agreement.**

Name and Title of Senior Official

Date

Entity Name

Entity Address

This “Agreement between Web-Brokers and the Centers for Medicare & Medicaid Services” has been signed by:

FOR THE CENTERS FOR MEDICARE & MEDICAID SERVICES (CMS)

The undersigned are officials of CMS who are authorized to represent CMS for purposes of this Agreement.

James Kerr
Acting Deputy Director, Operations
Center for Consumer Information & Insurance Oversight
Centers for Medicare & Medicaid Services

Date

Tony Trenkle
Director and CMS Chief Information Officer
Office of Information Services
Centers for Medicare & Medicaid Services

Date



DEPARTMENT OF HEALTH & HUMAN SERVICES

Centers for Medicare & Medicaid Services

200 Independence Avenue SW
Washington, DC 20201

Date: INSERT DATE
From: Center for Consumer Information and Insurance Oversight
Title: Affordable Insurance Exchanges Guidance
Subject: Role of Agents, Brokers, and Web-brokers in Affordable Insurance Exchanges

Consumers who access health insurance coverage through an Exchange will be able to receive assistance from a variety of sources, including in-person, online, and telephone support. Agents and brokers, including web-brokers, will also play a role in educating consumers about Exchanges and insurance affordability programs, and in helping consumers receive eligibility determinations, compare plans, and enroll in coverage. In particular, CMS anticipates that agents and brokers will play a critical role in helping qualified employers and employees enroll in coverage through the Small Business Health Options Programs (SHOP).

Section I of this document provides a high-level overview of the role of agents and brokers, including web-brokers, in Federally-facilitated and State Partnership Marketplaces. In section II, we address common questions raised by states and other stakeholders on the role of agents and brokers, including web-brokers, in all Marketplaces – including State-based Marketplaces.

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

I. Role of Agents, Brokers, and Web-brokers in Federally-facilitated and State Partnership Marketplaces

Where permitted under state law, CMS will work with agents and brokers to assist consumers in completing the eligibility application, comparing and selecting QHPs, and submitting enrollments through the Marketplace.

Agents and brokers will be able to assist consumers through either of two pathways: an issuer-based pathway, in which the agent or broker can use an issuer's website to assist the consumer, or a Marketplace pathway, in which the agent or broker can assist the consumer on the Marketplace website. In either pathway, the Marketplace will transmit an agent or broker's identifying information to the appropriate issuer to facilitate payment as part of the official enrollment transaction; in addition, both pathways will support initial enrollment and changes during the coverage year, including changes that impact eligibility. More information about each pathway is included below.

Pre-registration with the Marketplace

In states where an FFM or SPM is operating, all agents and brokers will need to register with CMS before assisting consumers. We expect that an online registration process administered by CMS will begin in late summer 2013, prior to open enrollment. The registration process will consist of three steps:

- (1) First, the agent or broker will confirm his or her identity by answering a number of simple questions online.
- (2) Second, the agent or broker will complete a Marketplace-specific online training course.
- (3) Third, the agent or broker will agree to comply with existing federal and state privacy and security policies when working with consumers in the Marketplace.

Once an agent or broker has completed these three steps, he or she will receive an active FFM user ID. This user ID is the agent or broker's unique identifier in the Marketplace, and is essential for facilitating compensation by an issuer.

Agents and brokers, including web-brokers, will need to comply with applicable Marketplace privacy and security standards. CMS expects to issue additional guidance in this area in the future.

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

Issuer-based Pathway for Assisting Consumers

Today, many agents and brokers use issuer websites and other resources to assist consumers. The issuer-based pathway builds on these existing processes to allow an agent or broker to assist consumers in the Marketplace. This pathway will be available to agents and brokers who are assisting individual consumers in 2014.

Agents and brokers will need to establish relationships with issuers before accessing this pathway. CMS expects that this process will include licensure verification, registration verification, and other elements at the discretion of the issuer and consistent with state law. Agents and brokers should provide copies of their training certificates and FFM user IDs to issuers as part of the appointment process.

To initiate this pathway, the agent or broker will log on to the issuer's agent website. Once the consumer determines that he or she would like to apply for coverage through the Marketplace, the agent or broker will be securely redirected from the issuer's agent website to the Marketplace website to complete the eligibility application. As part of this discussion with the consumer, CMS expects that the agent or broker will inform the consumer that he or she may visit the Marketplace website, where additional plan choices are available. The agent or broker will use his or her CMS FFM user ID to access the Marketplace website.

Once the agent or broker has completed the application with the consumer and received the consumer's eligibility determination from the Marketplace, the agent or broker will be securely redirected to the issuer's agent website to assist the consumer with plan comparison, plan selection, and enrollment. The agent or broker's identifying information will be included on the official enrollment record sent to the issuer.

Marketplace Pathway for Assisting Consumers

The Marketplace pathway will allow an agent or broker to assist consumers directly on the Marketplace website. This pathway will be available to agents and brokers who are assisting individual consumers, qualified employers, and employees in 2014.

In this pathway, the consumer, employer, or employee will log directly into his or her own Marketplace account. The agent or broker may assist the consumer in creating his or her account if needed, but the consumer must create his or her own Marketplace username and password.

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

After the consumer has created a username and password, the agent or broker and the consumer will work together to complete the eligibility application. The consumer will be prompted to enter the agent or broker's FFM user ID and national producer number (NPN) on the application to indicate that the agent or broker assisted the consumer.

After the consumer receives an eligibility determination, the agent or broker can assist the consumer in comparing QHPs on the Marketplace website and submitting the consumer's selection. As with the eligibility application, the consumer will enter the agent or broker's FFM user ID and NPN as part of the enrollment transaction to indicate that the agent or broker assisted the consumer with plan selection and enrollment.

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

II. Questions and Answers

The following questions and answers provide additional detail and clarification on the role of agents and brokers in all Marketplaces, including State-based Marketplaces.

1. Can a State-based Marketplace (SBM) establish a commission schedule or pay commissions? How will FFMs and SPMs address compensation?¹

Nothing in the Exchange regulation prohibits a state from establishing laws, regulations and standards for issuer compensation of agents or brokers, including for enrolling individuals through that state's Marketplace. Accordingly, SBMs may establish parameters for compensating agents and brokers, including direct compensation from the Marketplace, or allowing issuers to pay commissions. Where issuers pay commissions to agents or brokers, we encourage SBMs to consider providing information to issuers to facilitate these transactions (*e.g.*, by providing the agent or broker's national producer number or state license number).

FFMs, including SPMs, will not establish a commission schedule or pay commissions directly to agents or brokers. As is the case in the market today, we expect that the amount and terms of any commission would be negotiated by the issuer and the agent or broker. However, we note that HHS has established a QHP certification standard for issuers seeking certification in FFMs and Federally-facilitated SHOP (FF-SHOP) that would require the QHP issuer to pay the same agent and broker compensation for enrollment through the Marketplace and for enrollment in similar health plans offered outside the Marketplace.² CMS will evaluate this approach in the future. As described in Section I of this document, FFMs and SPMs will transmit agent and broker identifying information to issuers to facilitate payment.³

2. May a state participating in a State Partnership Marketplace modify processes and infrastructure for agents and brokers, including for training and registration?

For Federally-facilitated Marketplaces and State Partnership Marketplaces, CMS will be responsible for registering agents and brokers and conducting Exchange-related training.

¹ Compensation includes commissions, fees, or other incentives as established in the relevant agreement between an issuer and an agent or broker.

² HHS Notice of Benefit and Payment Parameters (78 F.R. 15410 – 15541). Available at: <http://www.gpo.gov/fdsys/pkg/FR-2013-03-11/pdf/2013-04902.pdf>.

³ Agents and brokers who are acting as Navigators may not receive compensation from issuers.

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

Upon completion of the registration and training, agents and brokers will complete a privacy and security attestation and obtain a FFM user ID.

States will continue to license and regulate agents and brokers, including those who assist consumers in the Marketplace. States will also continue to establish licensure and continuing education requirements for agents and brokers, and may require additional state-specific training as a condition of licensure. However, the FFM will not be able to accommodate state-specific training requirements for 2014.

3. *When assisting qualified individuals enrolling through a Marketplace, must an agent or broker display all QHPs? Must an agent or broker be able to enroll individuals in all QHPs?*

With the exception of web-brokers, the Exchange regulation does not require agents and brokers to display all QHPs or to facilitate enrollment into all QHPs (*see* 45 C.F.R. §155.220).⁴ SBMs have discretion to implement policies that would require agents and brokers to display all QHPs. For example, SBMs may establish additional requirements for QHP issuers under state law or as part of the SBM's QHP certification process, consistent with the Exchange final rule. SBMs may also consider providing information on agent and broker relationships with issuers, including issuer appointment and compensation arrangements, to consumers.

In FFMs and SPMs, CMS will not require agents and brokers to facilitate enrollment into all available QHPs. All agents and brokers must comply with applicable state laws, regulations, and Exchange requirements, including standards related to relationships or appointments with issuers.⁵

4. *What happens if an individual working with an agent or broker is determined to be eligible for Medicaid or CHIP?*

We expect that agents and brokers who are approached by individuals and families looking for assistance with Marketplace enrollment will work with all consumers, including individuals who are ultimately determined to be eligible for Medicaid or CHIP. Any individual who is working with a registered agent or broker and is determined by a Marketplace to be eligible for Medicaid or CHIP will receive an appropriate notice of

⁴ As noted in the response to question 12 in this document, web-brokers must display and facilitate enrollment into all QHPs available in an Exchange because they are acting as an alternate portal for selecting a QHP.

⁵ CMS has also issued Minimum Acceptable Risk Standards for Exchanges (MARS-E) requirements. The MARS-E baseline was established in a collaboration with the Internal Review Service and other key stakeholders, and is based on the National Institute of Standards and Technology Special Publication 800-53 (NIST SP 800-53) and IRS Publication 107.

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

assessment or determination of Medicaid/CHIP eligibility from the Marketplace.⁶ In such cases, we expect that the agent or broker would refer the individual to state Medicaid agency. We anticipate that agent and broker training will provide information on where to direct Medicaid or CHIP-eligible clients.

5. *How will agents and brokers work with qualified employers in FF-SHOPs?*

Agents and brokers who are assisted qualified small employers in enrolling through an FF-SHOP will use the Marketplace pathway described in Section I of this document. With the introduction of employee choice – in which employees of a single qualified employer may select QHPs offered by different carriers – in 2015, CMS believes that the Marketplace pathway is more appropriate for agents and brokers who are working with customers in FF-SHOPs. [Note to reviewers: this response subject to change. CCIIO is finalizing the agent/broker solution for SHOP].

6. *To what extent can agents and brokers continue communicating with consumers after they have been enrolled in a QHP through a Marketplace?*

Agents and brokers (including web-brokers) may continue to communicate with qualified individuals after they have enrolled in a QHP, to the extent that such communications comply with applicable state law and regulations and the QHP issuer's agreement with the agent or broker. Such communication also must comply with the privacy and security standards adopted by the Marketplace pursuant to 45 C.F.R. §155.260, which limit how an agent or broker may use any information gained as part of providing assistance and services to a qualified individual. CMS expects to issue additional guidance on privacy and security requirements for non-Marketplace entities in the future. With respect to the FF-SHOP, HHS expects that agents and brokers will be in continual contact with employers both before and after enrollment, as they will serve as a primary contact for customer service issues for employers.

7. *How will FFM's oversee agent and broker activity?*

Agents and brokers, including web-brokers, seeking to enroll qualified individuals through a Marketplace, including an FFM or State Partnership Marketplace, must be licensed as an agent or broker by the state and adhere to all applicable state law. We expect that states will maintain their current roles overseeing agents and brokers in their insurance markets. FFM's will work with state departments of insurance to coordinate oversight activities related to

⁶ For more information on Medicaid and CHIP eligibility assessments versus determinations, please see XXX.
INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

agents and brokers. For example, CMS expects to refer information on potential misconduct to state regulators.

We note that agents and brokers would also need to adhere to any agreements they have executed with specific QHP issuers. We do not expect FFMs to have a role in connection with such agreements, provided that they do not violate applicable laws, regulations, and requirements.

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Centers for Medicare & Medicaid Services

200 Independence Avenue SW
Washington, DC 20201

Date: May 1, 2013
From: Center for Consumer Information and Insurance Oversight
Title: Health Insurance Marketplace Guidance
Subject: Role of Agents, Brokers, and Web-brokers in Health Insurance Marketplaces

Consumers who access health insurance coverage through an Affordable Insurance Exchange, or Health Insurance Marketplace, will be able to receive assistance in a variety of ways, including in-person, online, and through telephone support. Agents and brokers, including web-brokers, are among those who will play a role in educating consumers about Marketplaces and insurance affordability programs, and in helping consumers receive eligibility determinations, compare plans, and enroll in coverage. In particular, CMS anticipates that agents and brokers will play a critical role in helping qualified employers and employees enroll in coverage through the Small Business Health Options Programs (SHOPs).

Section I of this document provides a high-level overview of the role of agents and brokers, including web-brokers, in Federally-facilitated Marketplaces and State Partnership Marketplaces. In section II, we address common questions raised by states and other stakeholders on the role of agents and brokers in all Marketplaces – including State-based Marketplaces. In section III, we address questions specific to web-brokers. Finally, the Appendix includes process flows for both pathways.

I. Role of Agents and Brokers in Federally-facilitated and State Partnership Marketplaces

Where permitted under state law, CMS will work with agents and brokers to assist consumers in completing the eligibility application, comparing and selecting qualified health plans (QHPs), and enrolling consumers through the Marketplace.

Agents and brokers intending to work with consumers in Federally-facilitated and State Partnership Marketplaces will be able to assist consumers in two ways: (a) an issuer-based pathway, through which an agent or broker uses an issuer's website to assist the consumer; or (b) a Marketplace pathway, through which an agent or broker assists the consumer using the Marketplace website. As explained in more detail below, both pathways will transmit to the Marketplace an agent's or broker's identifying information to the appropriate issuer to facilitate the issuer's payment to the agent or broker for each enrollment transaction. In addition, either pathway will allow an agent or broker to assist a qualified individuals and/or employers and employees with initial enrollment and changes during the coverage year, including changes that impact eligibility (e.g., adding a dependent). More information about each pathway is included below.

A. Registration with the Marketplace

In states where a Federally-facilitated or State Partnership Marketplace is operating, all agents and brokers must register with CMS so that they may assist qualified individuals for individual Marketplace coverage.¹ We expect that an online registration process administered by CMS will begin in the summer of 2013, prior to open enrollment. In completing the registration process, the agent or broker will:

- (1) Confirm his or her identity by answering a number of simple questions online.
- (2) Complete a Marketplace-specific online training course.
- (3) Agree to comply with federal and state laws, rules, standards and policies, including those related to privacy and security policies, as a condition of working with consumers in the Marketplace.

Once an agent or broker has completed these three steps, he or she will receive an active Federally-facilitated Marketplace user ID. This user ID is the agent or broker's unique identifier in the Marketplace, and it, along with the agent's or broker's national producer number (NPN), will be essential for the agent or broker to receive compensation from an issuer.

¹ CMS also encourages agents and brokers working exclusively in SHOPs to register and complete training.

B. Issuer-based Pathway for Assisting Consumers

Many agents and brokers already use issuer websites to assist consumers, and will be able to continue using issuer websites to work with consumers in the Federally-facilitated Marketplaces. This issuer-based pathway will be available to agents and brokers who are assisting individual consumers starting in the fall of 2013.

As is the case today, agents and brokers will be appointed by issuers; issuers will check the agent's or broker's licensure status and will verify an agent or broker's registration with the Federally-facilitated or State Partnership Marketplace. Agents and brokers will provide copies of their Federally-facilitated Marketplace training certificates and user IDs to issuers as part of the appointment process.

An agent or broker initiates this pathway by logging on to the issuer's website. Once the consumer determines that he or she would like to apply for coverage through the Federally-facilitated Marketplace, the agent or broker will be securely redirected from the issuer's agent website to the Marketplace website to complete the eligibility application, using his or her Federally-facilitated Marketplace user ID to access the Marketplace website. The agent or broker will be prompted to enter his or her Federally-facilitated Marketplace user ID and NPN as part of the eligibility application. As part of the discussion with the consumer, CMS expects that the agent or broker will inform the consumer that the agent or broker will provide information for certain QHPs with which he or she has a business relationship, but that the consumer could directly access the Federally-facilitated Marketplace website, where additional QHP information and choices are available.

Once the agent or broker has completed the application with the consumer and received the consumer's eligibility determination from the Federally-facilitated Marketplace, the agent or broker will be securely redirected to the issuer's website to assist the consumer with plan comparison, plan selection, and enrollment. The agent's or broker's identifying information will be included in the official Federally-facilitated Marketplace enrollment record sent to the issuer.

C. Marketplace Pathway for Assisting Consumers

An agent or broker will also be able to assist consumers directly on the Federally-facilitated Marketplace website using the Marketplace pathway. In fall 2013, agents and brokers will be able to use this pathway to help enroll qualified individuals with individual Marketplace options, as well as qualified employers and employees with SHOP options.

In the Marketplace pathway, the consumer, employer, or employee will log directly into his or her own Marketplace account. The agent or broker may assist the consumer in creating his or her account if needed, but the consumer or a legally authorized representative must create his or her

own Marketplace username and password and should not share this information with third parties, including agents and brokers.

The agent or broker will then work with the consumer to complete the eligibility application. The consumer will be prompted to enter the agent or broker's Federally-facilitated Marketplace user ID and NPN on the application to indicate that the agent or broker assisted the consumer.

After the consumer receives an eligibility determination, the agent or broker can assist the consumer in comparing QHPs on the Marketplace website and submitting the consumer's selection. All plan choices will be displayed. As with the eligibility application, the consumer will enter the agent's or broker's Federally-facilitated Marketplace user ID and NPN as part of the enrollment transaction to indicate that the agent or broker assisted the consumer with plan selection and enrollment.

To the extent permitted by a state, starting with the initial open enrollment period beginning in October 2013, CMS intends to work with web-brokers that meet all applicable requirements to provide an alternate option to help consumers select QHPs online. Please see section III for more information about web-brokers in the Federally-facilitated Marketplace.

II. Questions and Answers

The following questions and answers provide additional detail and clarification on the role of agents and brokers in all Marketplaces, including State-based Marketplaces.

1. *Can a State-based Marketplace establish a commission schedule or pay commissions? How will Federally-facilitated Marketplaces, including State Partnership Marketplaces, address compensation?*²

Nothing in the Exchange final rule prohibits a state from establishing laws, regulations and standards for issuer compensation of agents or brokers, including for enrolling individuals through that state's Marketplace. Accordingly, State-based Marketplaces may establish parameters for compensating agents and brokers, by direct compensation from the Marketplace, or by having issuers pay commissions. If issuers will be paying commissions to agents or brokers, we encourage State-based Marketplaces to consider providing information to issuers to facilitate these transactions (e.g., by providing the agent or broker's national producer number or state license number).

Federally-facilitated Marketplaces, including State Partnership Marketplaces, will not establish a commission schedule or pay commissions directly to agents or brokers. As is the case in the market today, we expect that the amount and terms of any commission would be negotiated by the issuer and the agent or broker. However, we note that HHS has established a QHP certification standard for issuers seeking certification in Federally-facilitated Marketplaces and Federally-facilitated SHOPS (FF-SHOPS) that would require QHP issuers to pay the same agent and broker compensation for enrollment through the Federally-facilitated Marketplaces and FF-SHOPS and for enrollment in similar health plans offered outside the Federally-facilitated Marketplaces and FF-SHOPS.³ CMS will re-evaluate this approach in the future. As described in Section I of this document, Federally-facilitated Marketplaces and State Partnership Marketplaces will transmit agent and broker identifying information to issuers to facilitate payment.⁴

2. *May a state participating in a State Partnership Marketplace modify processes and infrastructure for agents and brokers, including for training and registration?*

For Federally-facilitated Marketplaces, including State Partnership Marketplaces, CMS will be responsible for registering agents and brokers and conducting Marketplace-related training.

² Compensation includes commissions, fees, or other incentives as established in the relevant agreement between an issuer and an agent or broker.

³ HHS Notice of Benefit and Payment Parameters (78 F.R. 15410 – 15541). Available at: <http://www.gpo.gov/fdsys/pkg/FR-2013-03-11/pdf/2013-04902.pdf>.

⁴ Agents and brokers who are acting as Navigators may not receive compensation from issuers.

Upon completion of the registration and training, agents and brokers will complete a privacy and security agreement and obtain a Federally-facilitated Marketplace user ID.

States will continue to license and regulate agents and brokers, including those who assist consumers in the Marketplace. States will also continue to establish licensure and continuing education requirements for agents and brokers, and may require additional state-specific training as a condition of licensure. However, the Federally-facilitated Marketplace training will not include state-specific training requirements in 2014.

3. *When assisting qualified individuals enrolling through a Marketplace, must an agent or broker display all QHPs? Must an agent or broker be able to enroll individuals in all QHPs?*

With the exception of web-brokers, the Exchange final rule does not require agents and brokers to display all QHPs or to facilitate enrollment into all QHPs (*see* 45 C.F.R. §155.220).⁵ State-based Marketplaces have discretion to implement policies that would require agents and brokers to display all QHPs. For example, State-based Marketplaces may establish additional requirements for QHP issuers under state law or as part of the State-based Marketplace QHP certification process, consistent with the Exchange final rule. State-based Marketplaces may also provide information to consumers on agent and broker relationships with issuers, including issuer appointment and compensation arrangements.

In Federally-facilitated Marketplaces, including State Partnership Marketplaces, CMS will not require agents and brokers to facilitate enrollment into all available QHPs.⁶ If the agent or broker is using the Marketplace pathway to assist consumers, all QHP choices will be displayed. All agents and brokers must comply with applicable state laws, regulations, and Marketplace requirements, including standards related to relationships or appointments with issuers.⁷

4. *What happens if an individual working with an agent or broker is determined to be eligible for Medicaid or CHIP?*

We expect that agents and brokers who are approached by individuals and families looking for assistance with Marketplace enrollment will work with all consumers, including individuals who are ultimately determined to be eligible for Medicaid or CHIP. Any individual who is working with a registered agent or broker and is determined by a

⁵ As noted in the response to question 11 in this document, web-brokers must display all QHPs available in a Marketplace.

⁶ Agents and brokers who are acting as Navigators would be required to facilitate enrollment into all available QHPs.

⁷ CMS has also issued Minimum Acceptable Risk Standards for Exchanges (MARS-E) requirements. The MARS-E baseline was established in a collaboration with the Internal Review Service and other key stakeholders, and is based on the National Institute of Standards and Technology Special Publication 800-53 (NIST SP 800-53) and IRS Publication 107.

Marketplace to be eligible for Medicaid or CHIP will receive an appropriate notice of assessment or determination of Medicaid/CHIP eligibility from the Marketplace. In such cases, we expect that the agent or broker would refer the individual to state agency. We anticipate that agent and broker training will provide information on where to direct Medicaid or CHIP-eligible individuals.

5. *How will agents and brokers work with qualified employers in FF-SHOPs?*

Agents and brokers who assist qualified small employers in enrolling through an FF-SHOP will use the Marketplace pathway, except that agents and brokers will not be required to obtain a Federally-facilitated Marketplace user ID. As in the Marketplace pathway for consumers shopping for individual coverage, the SHOP application will include a field in which the employer or agent/broker can enter a Federally-facilitated Marketplace user ID (if applicable) and/or NPN. This information will be transmitted to the QHP issuer selected by the employer as part of the group enrollment.

6. *To what extent can agents and brokers continue communicating with consumers after they have been enrolled in a QHP through a Marketplace?*

Agents and brokers (including web-brokers) may continue to communicate with qualified individuals after they have enrolled in a QHP, to the extent that such communications comply with applicable laws and regulations. Such communication also must comply with the privacy and security standards adopted by the Marketplace pursuant to 45 C.F.R. §155.260, which limit how an agent or broker may use any information gained as part of providing assistance and services to a qualified individual. CMS expects to issue additional rulemaking on privacy and security requirements for non-Marketplace entities. With respect to the FF-SHOP, CMS expects that agents and brokers will be in continual contact with employers both before and after enrollment, as they will serve as a primary contact for customer service issues for employers.

III. Additional Guidance for Web-brokers

45 C.F.R. 155.220(c)(3) establishes requirements that would apply when consumers in the Health Insurance Marketplaces for individual health insurance products select a QHP through an agent's or broker's website. CMS refers to such agents or brokers who enroll consumers through public-facing websites as "web-brokers." We expect web-brokers to provide another option for consumers seeking to enroll in QHPs through the Marketplaces for individual products, alongside traditional agents and brokers who will also be assisting consumers enroll through the Marketplace.

CMS recognizes that many consumers currently purchase insurance online from web-brokers. This guidance answers common questions about the role of web-brokers in Marketplaces.

7. Can State-based Marketplaces work with web-brokers?

Yes. In addition to operating its own Marketplace website, a State-based Marketplace can work with web-brokers to provide an alternate plan selection option for consumers. States may allow web-brokers to use their websites to provide consumer information for comparing and selecting QHPs, subject to the standards specified in 45 C.F.R. 155.220(c) for individual market QHPs.

State-based Marketplaces must continue to perform eligibility determination functions as set forth in subpart D of part 155 of the Exchange final rule and transmit enrollment information to QHP issuers for all individuals enrolling through the Marketplace – including those who enroll through the Marketplace with the assistance of web-brokers – as described in 45 C.F.R. 155.400.

8. Will Federally-facilitated Marketplaces offer the web-broker option?

Yes. To the extent permitted by a state, beginning in October 2013, CMS intends to work with web-brokers that meet all applicable requirements to provide an alternate option to help consumers select QHPs online. Web-brokers will provide an additional channel for Federally-facilitated Marketplaces to reach consumers and to help them enroll in QHPs. CMS is developing the capability to support integration between the web-broker's website and the Federally-facilitated Marketplace's website using secure redirect and application programming interface mechanisms. The application programming interface will allow a qualified individual to initiate his or her shopping experience on the web-broker's website, connect securely to the Federally-facilitated Marketplace website to complete the eligibility application and determination process, and return securely to the web-broker's site to compare plans and select a QHP.

9. *How will web-brokers working with Federally-facilitated Marketplaces obtain consumer and QHP data?*

In Federally-facilitated Marketplaces, the application programming interface will facilitate the secure transmission of key eligibility and enrollment information between the Marketplace and the web-broker.

CMS will make available to web-brokers QHP data, including premium information, provided by issuers to CMS. CMS will provide further technical guidance on how QHP data will be conveyed to web-brokers. Web-brokers will also receive consumer-specific eligibility information via a secure redirect from the Marketplace. These data will include contact information for the application filer and the individual or family's eligibility determination, including information on the maximum advance payment of premium tax credit (APTC) and cost-sharing reductions for which the individual or family is eligible.

After the consumer selects a QHP and the APTC amount has been determined, the web-broker will transmit the individual or family's QHP selection, including the applicable premium, APTC amount that will be applied to the premium, and broker identifier, back to the Marketplace.

The Marketplace, as the system of record for all eligibility and enrollment transactions, will convey all enrollment information to appropriate QHP issuers, including information identifying the web-broker in order to facilitate compensation by the issuer. Individuals determined eligible for Medicaid and CHIP will be referred by the Marketplace to the appropriate state agency.

Given the sensitive nature of personally identifiable information, web-broker websites will be required to comply with all existing and future privacy and security standards established by HHS pursuant to 45 C.F.R. 155.260, related to the use and handling of personally identifiable information obtained during the enrollment process, regardless of whether the enrollment is completed. These security standards will also require authentication of consumers to prevent unauthorized access to sensitive information.

10. *Under 45 C.F.R §155.220(c)(3)(iv), web-brokers must display all QHPs available through a Marketplace. Is the Federally-facilitated Marketplace establishing standards for appointments with issuers?*

Web-brokers must display all QHPs available through a Marketplace, irrespective of compensation or appointment arrangements. Web-brokers must comply with all applicable

state law, including state law related to appointments, as a condition of enrolling individuals through the Marketplace. If a consumer intends to enroll in a QHP for which the web-broker does not hold an appointment, the web-broker should direct the consumer to the Federally-facilitated Marketplace.

11. In the Federally-facilitated Marketplace, will web-brokers be able to modify the display of QHPs presented on their websites? What consumer protections must web-brokers keep in mind?

In Federally-facilitated Marketplaces, CMS expects that the sort order of or sorting algorithm for QHPs will not steer a consumer to a particular QHP based upon financial consideration to the web-broker. CMS also expects that a web-broker will disclose to the consumer the specific source and nature of web-broker compensation and that the compensation does not affect the display of QHP options or the premiums charged. CMS expects that consumers will not be charged a separate transaction or service fee for shopping or enrolling in a QHP through a web-broker's services or website.

Web-brokers also may offer additional tools or decision support that the consumer can use to navigate or refine the display of QHPs. In addition, CMS expects web-brokers to display QHPs separately from non-QHPs, and offer a QHP plan selection experience that is free from advertisements or information for other health insurance-related products and sponsored links advertising health insurance-related products (e.g., an advertisement for a QHP issuer). Once a consumer has completed QHP plan selection and enrollment, the web-broker may offer the consumer the ability to search for additional products or services if desired. CMS expects that such offers will be made in a section of the web-broker's website that is separate from the QHP display.

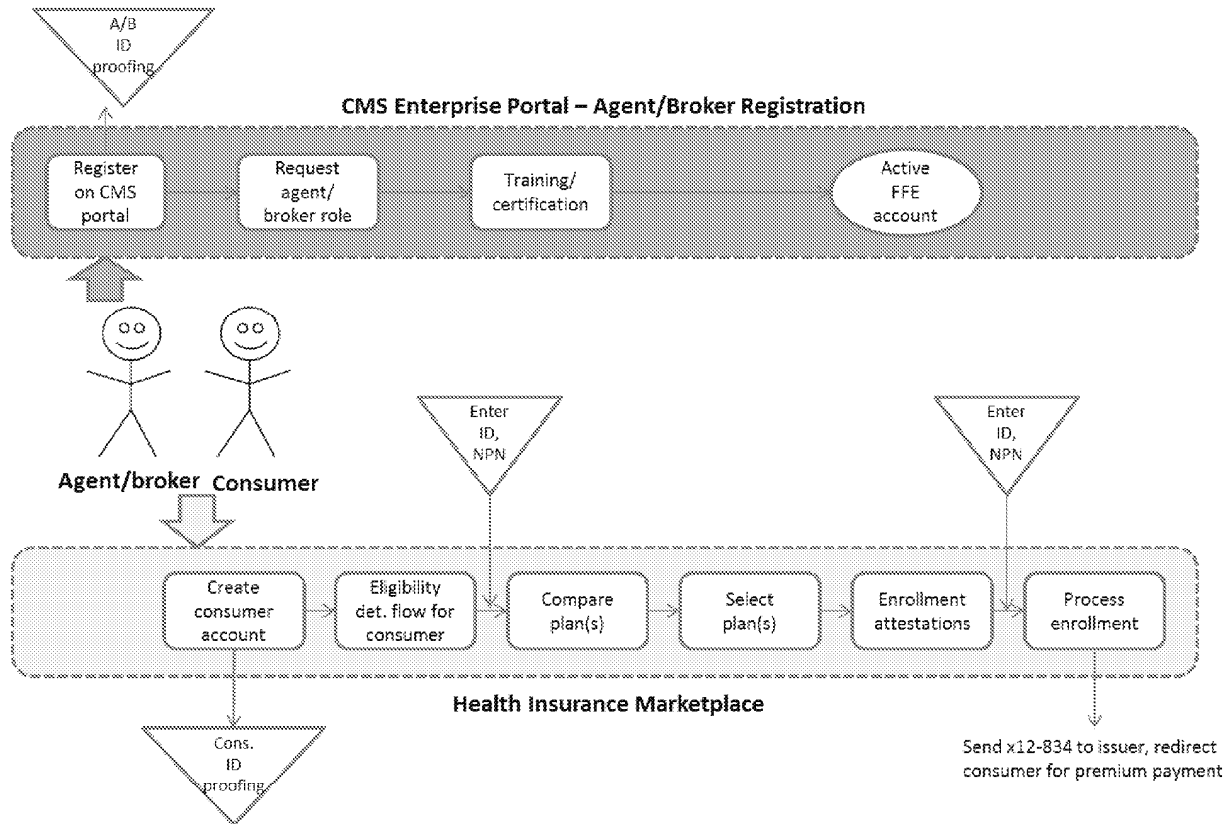
A web-broker must adhere to the website disclosure and display standards specified in 45 C.F.R. 155.205(b)(1) and (c). In particular, we expect a web-broker to make available quality information on each QHP offered through a Marketplace easily accessible to consumers, including consumers with disabilities and limited English proficiency.

CMS also expects the web-broker to prominently display language explaining to consumers that the web-broker has entered into an agreement with CMS and has agreed to conform to website display and security standards in 45 C.F.R. 155.220(c)(3) and 155.260. Such language will also explain that the web-broker's website is distinct from the Federally-facilitated Marketplace website, and that consumers may opt to use the Federally-facilitated Marketplace website at any time. CMS will provide standard language that a web-broker may use on its website for this purpose in future guidance.

Issuer-based Pathway



Marketplace Pathway





Federal Data Services Hub (DSH) Requester Onboarding Summary Document

Contract Number: HHSM-500-2007-00024I
Task Order No: HHSM-500-T0007

March 2013
Version 0.1
Document Control Number:

Quality Software Services, Inc.
10025 Governor Warfield Pkwy, Suite 401
Columbia, MD 21044
Main: (301) 977-7884
Fax: (410) 740-4281

REVISION HISTORY

| DATE | VERSION | DESCRIPTION | MODIFIED BY |
|----------------|---------|------------------|-------------|
| March 21, 2013 | 0.1 | Initial Baseline | QSSI |
| | | | |
| | | | |

SIGNATURES

The signatures below represent authorization for the QSSI Health Insurance Exchange (HIX) Data Services Hub (DSH) team to use QSSI and project resources to perform tasks in association with the successful completion of this Requester Onboarding Summary document and subsequent process improvement initiatives and activities.

Jagadish Akula, Requirements Team Lead

Date

Jagadish Gangahanumaiah, Development Manager

Date

Niranjan Santhamoorthy, Deputy Project Manager

Date

Karlton Kim, Project Manager

Date

TABLE OF CONTENTS

| | | |
|----------|---|----------|
| 1 | INTRODUCTION..... | 1 |
| 1.1 | PURPOSE..... | 1 |
| 1.2 | SCOPE..... | 2 |
| 1.3 | INTENDED AUDIENCE | 2 |
| 1.4 | REFERENCED DOCUMENTS | 2 |
| 1.5 | ACRONYM LIST | 2 |
| 2 | ONBOARDING PREREQUISITES..... | 3 |
| 2.1 | ACCESS TO THE CMS SERVICE CATALOG | 3 |
| 2.1.1 | Gaining CMS Service Catalog access..... | 3 |
| 2.1.2 | Opening CMS Service Catalog | 4 |
| 2.2 | GENERATE A LOCAL CERTIFICATE | 5 |
| 2.2.1 | Export Local Certificate | 6 |
| 2.3 | REQUEST A HUB PARTNER ID | 7 |
| 2.4 | CONFIGURING NotResp | 7 |
| 2.4.1 | WS Security Standards..... | 8 |
| 2.4.2 | Assumptions..... | 8 |
| 2.4.3 | Recommendations..... | 9 |
| 2.4.4 | Importing Certificates | 9 |
| 2.4.5 | Configure NotRe for Outgoing Security | 11 |
| 2.4.6 | Configure sp for Keystores/Certificates | 12 |
| 2.4.7 | Configure NotRe Test Request Properties | 12 |
| 2.4.8 | Configure sp Endpoint | 13 |
| 2.4.9 | Configure NotRe to Add WS Security Header | 13 |
| 2.4.1 | NotResp Security Test..... | 14 |
| 2.5 | CUSTOMER SUPPORT | 15 |

LIST OF FIGURES

| | |
|--|---|
| Figure 1 - Home Page for the User | 4 |
| Figure 2 - Asset Catalog view..... | 4 |
| Figure 3 - the command prompt window after generating the local certificate..... | 5 |

| | |
|--|----|
| Figure 4 - the command prompt window after exporting the local certificate | 6 |
| Figure 5 - the command prompt window after importing the primary VeriSign certificate..... | 9 |
| Figure 6 - the command prompt window after importing the secondary VeriSign certificate | 10 |
| Figure 7 - the command prompt window after importing the DSH Gateway certificate | 10 |
| Figure 8 - the tabs and areas used in configuring NotResp for the Outgoing Security | 12 |
| Figure 9 - the tabs and areas used in configuring NotResp Keystores/Certificates | 12 |
| Figure 10 - TestRequest Properties tab | 13 |
| Figure 11 - Endpoint drop down | 13 |
| Figure 12 - Request tab | 14 |
| Figure 13 - Request and Response | 14 |
| Figure 14 - Remove all outgoing wss | 15 |

LIST OF TABLES

| | |
|-------------------------------------|---|
| Table 1: Referenced Documents | 2 |
| Table 2: Acronym List | 2 |

1 Introduction

1.1 Purpose

The Affordable Care Act (ACA) lays out a vision for a streamlined eligibility and enrollment process, with supporting business and data activities designed to return accurate results with minimal administrative complexity. This system will be consumer-centric, with minimal burden on the consumer, and eligibility determinations will be made in a single online session whenever possible.

Achieving this vision requires a high level of coordination among Federal and State partners, including the development of interoperable Information Technology architecture and the integration of existing supporting business services. To that end, the Centers for Medicare and Medicaid Services (CMS) is working to establish a Data Services Hub (DSH) or “the Hub” that will provide centralized, standardized and reliable services to the Exchanges, Medicaid and CHIP programs which will minimize administrative burden and IT costs for Exchanges and Federal / state agencies by avoiding the development of multiple new point-to-point interfaces at each Federal / state agency partner.

The expectation is that the Federally Facilitated Exchanges (FfEs), State-Based Exchanges (SBEs), and Trusted Data Source (TDS) will integrate with the Hub to provide services to verify an applicant’s eligibility, and ultimately enrolling him/her under a qualified health plan, Medicaid, CHIP, APTC, or CSR.

The Hub logical data model leverages CMS Enterprise Canonical Data Model (ECDM) and the National Information Exchange Model (NIEM). The Hub expects Requestors to send CMS ECDM compliant messages.

1.2 Scope

This document is a technical guide to establish a connection with the Hub web Services in the testing and production environment.

1.3 Intended Audience

The current version of this document is intended for use by CMS identified partner agencies' development team. The partner agencies that want to access the Hub web services are referred as Requestors in this document.

1.4 Referenced Documents

The table below identifies all artifacts referenced while developing this document.

TABLE 1: REFERENCED DOCUMENTS

| DOCUMENT NAME | DATE |
|--------------------------------|------------|
| DSH - On Boarding Summary.pptx | 02/27/2013 |

1.5 Acronym List

The table below defines the acronyms used in this document.

TABLE 2: ACRONYM LIST

| ACRONYM | DEFINITION |
|---------|--|
| ACA | Affordable Care Act |
| APTC | Advance Payments on the Premium Tax Credit |
| BHP | Basic Health Program |
| CHIP | Children's Health Insurance Program |
| CMS | Centers for Medicare & Medicaid Services |
| CSR | Cost-Sharing Reduction |
| DSH | Data Services Hub |
| ESI | Employer Sponsored Insurance |
| FFE | Federally Facilitated Exchange |
| HHS | U.S. Department of Health and Human Services |
| ID | Identification |
| MEC | Minimum Essential Coverage |
| QHP | Qualified Health Plan |
| SBE | State-Based Exchanges |
| SSN | Social Security Number |
| TDS | Trusted Data Source |
| VHA | Veterans Health Administration |

2 Onboarding Prerequisites

There are certain pre-requisites that Requestors need to complete for accessing the Hub web services. The prerequisites are as follows:

- Access to the CMS Service Catalog
- Generate a Local Certificate (for the testing environment)
- Request a Hub Partner ID
- Configuring **NotResp** for the testing environment)

The prerequisites are explained in the following sections. It's recommended to read the entire document before performing the steps mentioned.

2.1 Access to the CMS Service Catalog

The CMS Service Catalog is the primary tool for Requestor development to access the following information:

- Business Service Definitions (BSDs) / Interface Control Document (ICDs)
- **NotResp** Test Scenarios
- Service End Points
- Web Service Description Language (WSDL)

In the production environment the Hub will provide required authorization for the services to each partner. This will be configured at the Hub gateway.

2.1.1 Gaining CMS Service Catalog access

To get access to the CMS Service Catalog the requestor development team needs to place a request for a Service Repository account id by:

- a. Completing the Service Catalog User application form located at:

https://**NotResp**

or

https://**NotResp**

- b. Sending the completed application to the following email address:

NotResp@qssinc.com

Note:

- i. Access is limited to CMS designated partner agencies and their contractors
- ii. CMS permits two Service Repository account IDs per State. However, when a State has many different IT vendors, then two additional account IDs per IT vendor are allowed.

2.2 Generate a Local Certificate

The Requestor will use Local Certificates in the testing environment and CA signed certificates in the production environment.

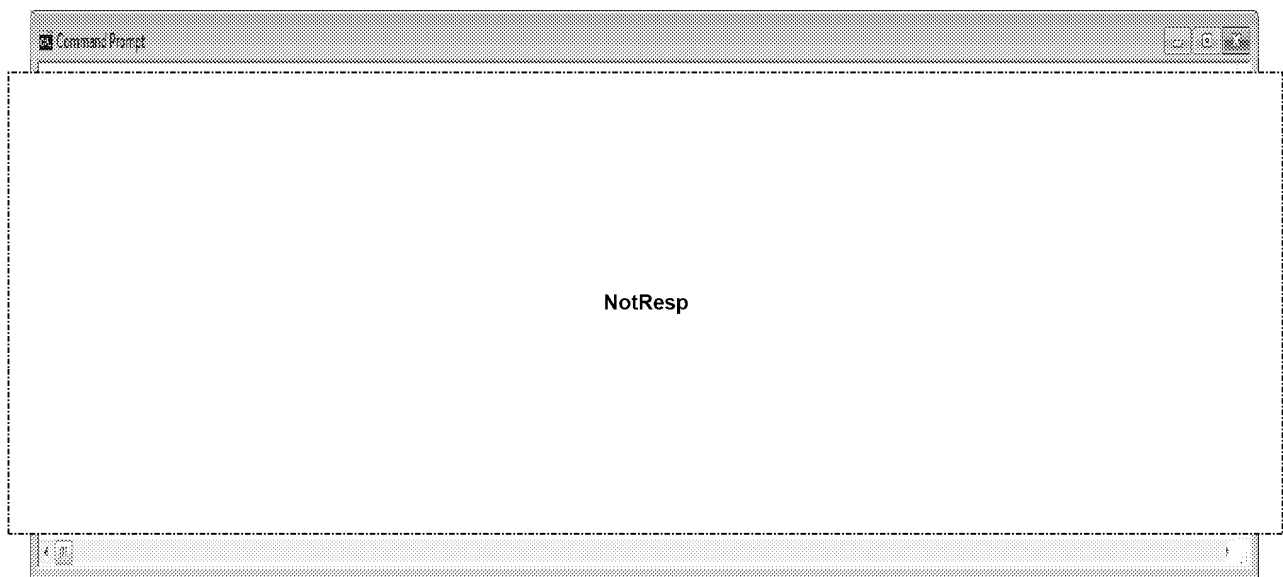
The steps to generate the local certificate are as follows:

- a. Type: in the command prompt window.

The alias guidelines are as follows:

- QSSI:
 - CGI:
 - CMS UAT:
 - SBE states:
 - Medicaid:
 - Other Testers: Contact @qssinc.com to obtain an alias
- b. When prompted, select a password for your certificate. Be sure to avoid personal passwords.
 - c. In the First and Last name field, enter the Organization name (ex: QSSI)
 - d. Enter the name of your organization unit (ex: FFE, SBE, DSH, Medicaid, CHIP etc.).
 - e. Enter the city, state, and country.
 - f. Enter “yes” to import certificate into keystore
 - g. Press ENTER.

FIGURE 3 - THE COMMAND PROMPT WINDOW AFTER GENERATING THE LOCAL CERTIFICATE



Note:

- i. This is a one-time setup at an organization level.
- ii. If the Requestor has a trusted CA issued certificate, then skip the Local Certificate and Export Local Certificate steps.
- iii. The generated local certificate will be stored in the current working directory. Be sure to make a note of this location.
- iv. Email a copy of the local certificate to the DSH team.

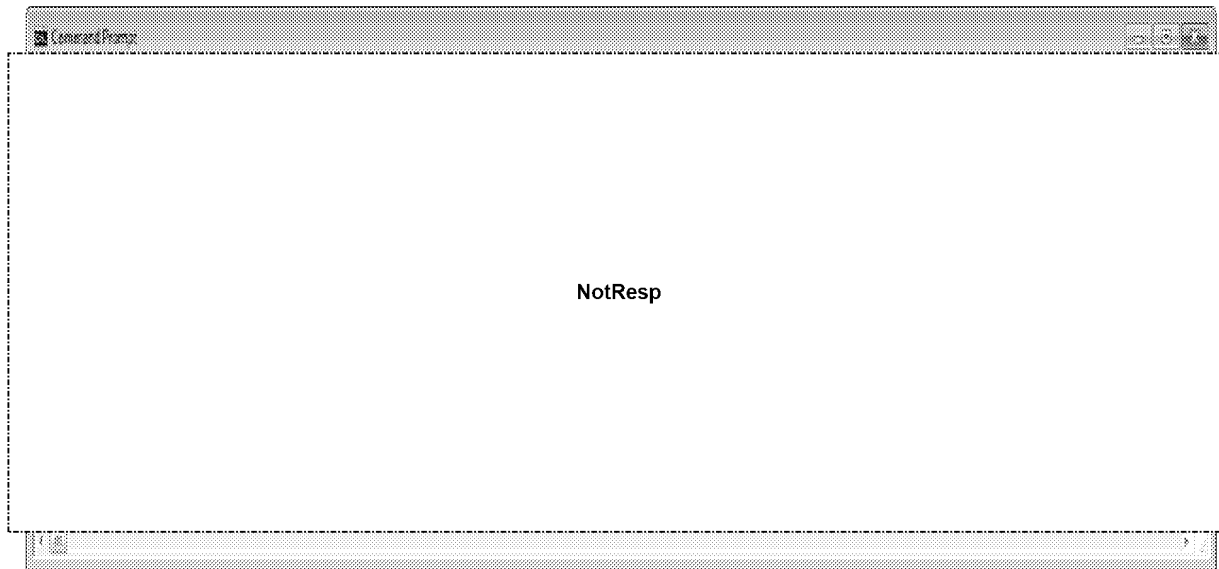
2.2.1 Export Local Certificate

The steps to export the local certificate as a .cer File are as follows:

Important! Use the alias guidelines from the Generate Local Certificate slide.

1. Type NotResp in the command prompt window.
2. When prompted, enter the password that was used while generating the local certificate.

FIGURE 4 - THE COMMAND PROMPT WINDOW AFTER EXPORTING THE LOCAL CERTIFICATE



Note:

- i. This is a one-time setup at an organization level.

2.3 Request a Hub Partner ID

The Hub is a single interface for all Marketplace partners, including the FFM, SBMs, State Partnership Marketplaces (SPMs), trusted data sources (TDSs), and Medicaid/CHIP agencies. TDSs include the Social Security Administration (SSA), the Department of Homeland Security (DHS), the Internal Revenue Service (IRS), CMS, the Veterans Health Administration (VHA), the Department of Defense (DOD), the Office of Personnel Management (OPM), Peace Corps, and others. The Hub allows multiple organizations to exchange data that must be transferred and stored in order to conduct Marketplace transactions. The Hub issues Partner ID for each partner. The Hub uses the Partner ID to correlate the messages with the Requestor.

To request the Hub Partner ID the Requestor has to send an email with the following information to the DSHSecurity group [NotResp]@qssinc.com):

- Name
- Organization Name (e.g., QSSI)
- Organization Unit (e.g., DSH, FFE, and SBE)
- Email address
- Phone number
- Attach the certificate file.

The QSSI email server does not accept attachments with the .cer extension therefore copy the [NotResp]er file to [NotResp] .txt and attach th [NotResp] .txt file.

Within 2 business days the DSHSecurity group provides the following information to the Requestor on an email:

- o User ID to be used in the WSSE header
- o A zip file as an attachment with:
 - * The Primary and Secondary VeriSign certificates
 - * The public key for the DSH Gateway
- o End points secured by the [NotResp] Gateway on the Terremark Environment. This is used in the [NotResp] test.

A second email will follow with the password to be used along with the User ID in the WSSE header.

After unzipping the attached zip file, save the 3 certificates to the folder from where the commands will run.

The User ID, password, and Certificates are used to build the keystore and configure soapUI.

In case the Requestor development team encounters problems with the security certificate steps, they can contact QSSI at [NotResp]@qssinc.com.

2.4 Configuring [NotResp]

In the test environment Requestors uses the [NotResp] for connectivity testing with Hub whereas in production connectivity will be between the Hub and the Requestor application.

The soapUI has to be configured before connectivity test with the Hub. The following steps need to be followed to configure [NotResp]

- Share the Security Information within the Organization
- Configure [NotResp] Outgoing Security
- Configure [NotResp] Keystore/Certificates
- Configure [NotResp] Test Request Properties
- Configure the [NotResp] endpoint
- Configure [NotResp] to Add [NotResp] Header

2.4.1 WS Security Standards

The required security standards to access DSH Secure Web service (for both the testing and production environments) are as follows:

- a. WS Security 1.1 – The standard components of [NotResp] are:
 - Standard XML schemas;
 - Timestamps;
 - Username Token;
 - Password digest; and
 - [NotResp] certificates.
- b. Password Hashing Algorithm [NotResp]
- c. [NotResp] for services implemented in Sprint 3 (e.g. SSA verification) – These services will be redesigned as composite services to use [NotResp]
- d. [NotResp] Starting Sprint 4 this will be the standard for all DSH services.
- e. [NotResp] UserName [NotResp]

2.4.2 Assumptions

Assumptions for configuring [NotResp] DSH Web services for security testing are as follows:

- a. The development team has experience in using [NotResp] or [NotResp]
- b. The [NotResp] project (for ex. VerifySSN) is already present in the tester's workspace.
- c. Windows 2007 is the operating system.
- d. [NotResp] installed on the tester's machine.
- e. [NotResp] and [NotResp] are set in the PATH variable.
- f. The development team is familiar using [NotResp] elements in the [NotResp] header message within [NotResp]
- g. Initial security testing will be done in the Terremark DEV environment (shared cloud).Data Element Definitions.

- h. The 3 unzipped certs from the hub + (Requestor) local cert + (Requestor) keystore, are stored in the same directory.

2.4.3 Recommendations

The list of recommendations before running the DSH Secure Web service tests are as follows:

- a. One-time setup activities are needed at the Requestor organizational level. This should be performed by a technician who is familiar with NotResp command prompt NotResp and security performs these tasks.
- b. The Requestor organization should make an effort to resolve the setup issues by contacting experts within the organization prior to contacting the DSHSecurity group.
- c. Use the same current working directory for all command prompt items.

2.4.4 Importing Certificates

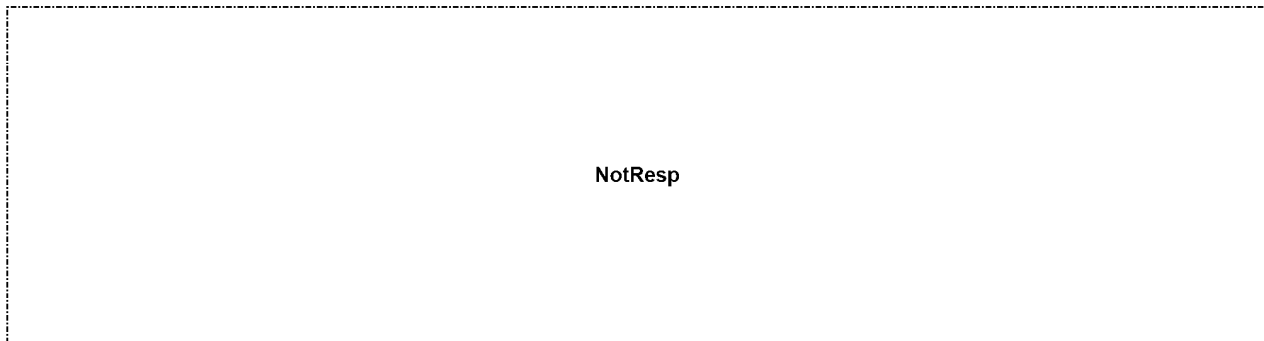
The following steps are one time setup for the Requestor organization:

Importing the Primary VeriSign Certificate to Local Keystore

The steps to import the primary VeriSign certificate to the local key store are as follows:

- a. Type NotResp
NotResp Hint: Copy/Paste the command w/o "" in the command prompt window.)
- b. When prompted, enter a password (that was created for the local certificate)

FIGURE 5 - THE COMMAND PROMPT WINDOW AFTER IMPORTING THE PRIMARY VERISIGN CERTIFICATE

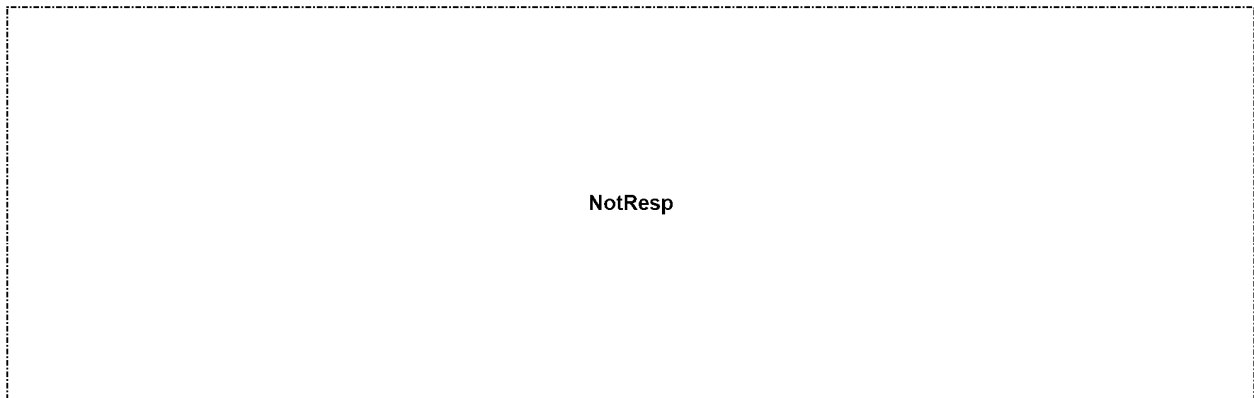


Importing the Secondary VeriSign Certificate to Local Keystore

The steps to import the secondary VeriSign certificate into the local keystore are as follows:

- a. Type NotResp
NotResp (Hint: Copy/Paste the command w/o "" in the command prompt window.)
- b. When prompted, enter a password.

FIGURE 6 - THE COMMAND PROMPT WINDOW AFTER IMPORTING THE SECONDARY VERISIGN CERTIFICATE

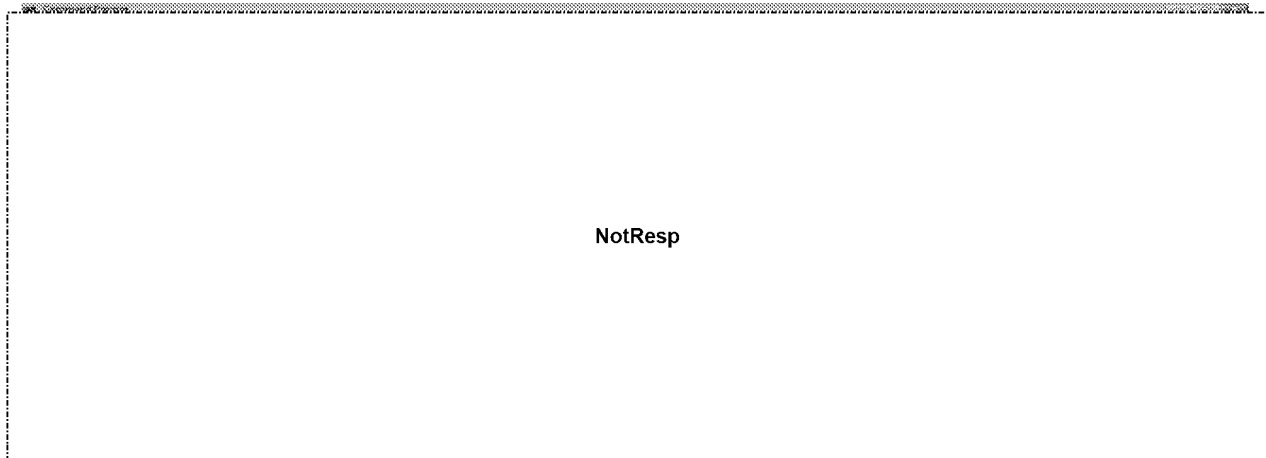


Importing the DSH Gateway Certificate to Local Keystore

The steps to import the DSH Gateway certificate into the local keystore are as follows:

- a. Type NotResp (Hint: Copy/Paste the command w/o "" in the command prompt window.)
- b. When prompted, enter a password.

FIGURE 7 - THE COMMAND PROMPT WINDOW AFTER IMPORTING THE DSH GATEWAY CERTIFICATE



For easier configuration the following measures are recommended:

- Use the same password that was created for the local certificate.
- Ensure that the current working directory has the three unzipped certificates.
- The local keystore will hold all the trusted certificates.
- The keystore will be stored in the current working directory. Make a note of this location.

For sharing the Security Certificate share the following items within the organization :

- The NotResp file.

- The password created for the keystore file.
- The user id and password received from the DSHSecurity group.
- The endpoint received from the DSHSecurity group.

2.4.5 Configure NotResp for Outgoing Security

The steps to configure NotResp for the outgoing security are as follows.

Note: The steps are shown with the help of SSN composite service.

- a. Double-click the Verify SSN project (i.e. NotResp).
- b. Click NotResp Configuration and select the Outgoing NotResp Configuration tab.
- c. Click the “+” sign under the Outgoing NotResp Configuration tab to add Outgoing Configuration.
- d. Enter a name for configuration (e.g., Outgoing).

The steps to configure the username and NotResp entry are as follows:

- a. Click the “+” sign on the bottom right tab to add the NotResp entry.
- b. Select the user name from the drop-down and click OK.
- c. Enter the user name and password received from the DSHSecurity group email.

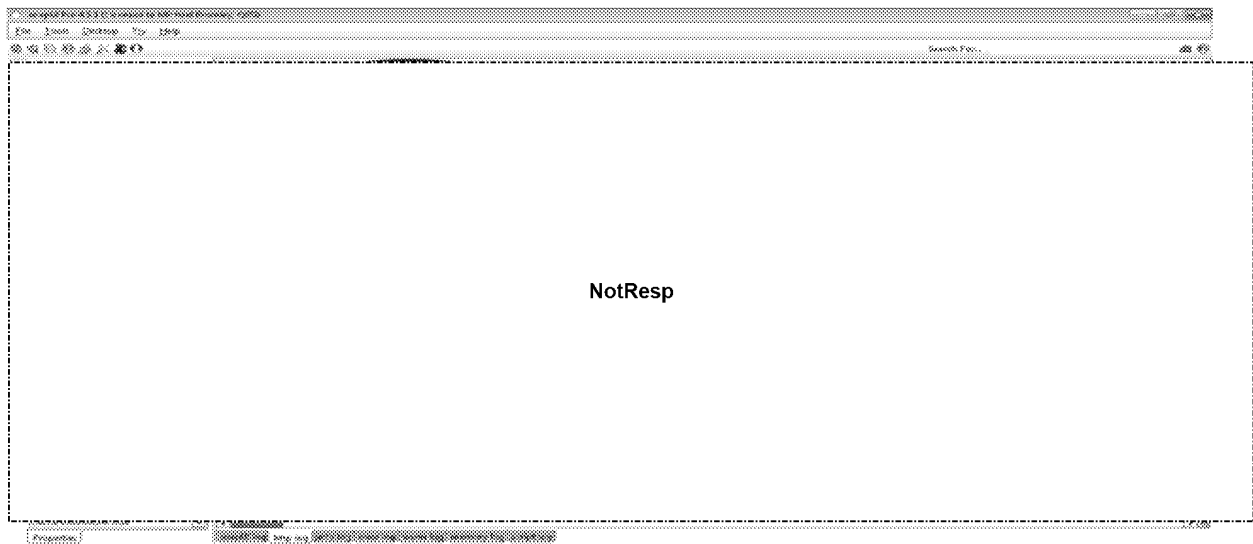
Note: Select NotResp for the Password Type.

The steps to configure Timestamp NotResp entry are as follows:

- a. Click the “+” sign on the bottom right tab to add another NotResp entry.
- b. Select Timestamp from the drop-down and click OK.
- c. Enter 1500 in the Time to Live box.

Note: The NotResp tool should be configured to include the outgoing elements in the NotResp Header.

FIGURE 8 - THE TABS AND AREAS USED IN CONFIGURING SOAPUI FOR THE OUTGOING SECURITY

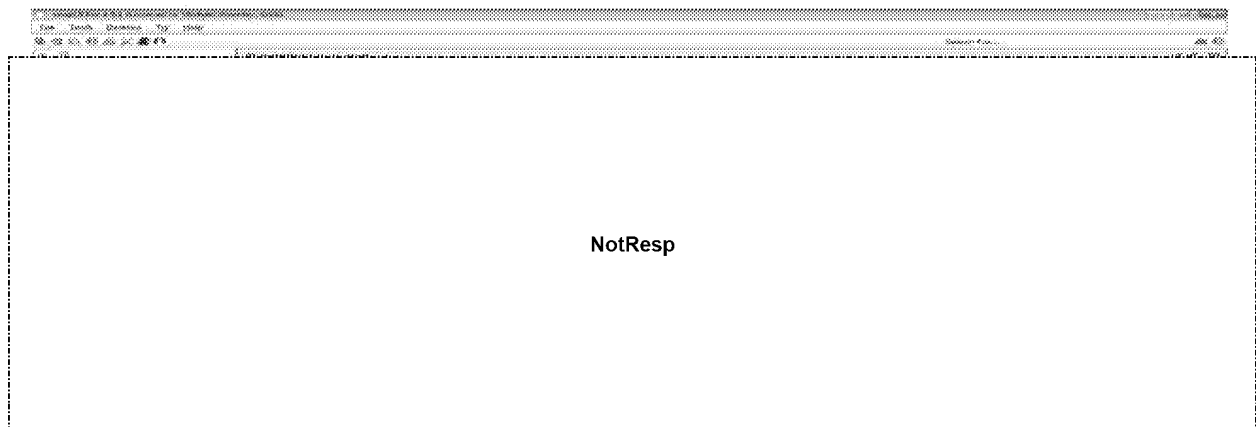


2.4.6 Configure **NotResp** for Keystores/Certificates

The steps to configure **NotResp** for keystore/certificates are as follows:

- Click on the Keystores/Certificates tab.
- Click the “+” sign under the Outgoing **NotResp** Configuration tab.
- Navigate to the folder with the keystore file, and select **NotResp**.
- When prompted, enter the password created while generating the **NotResp** file.

FIGURE 9 - THE TABS AND AREAS USED IN CONFIGURING SOAPUI KEYSTORES/CERTIFICATES



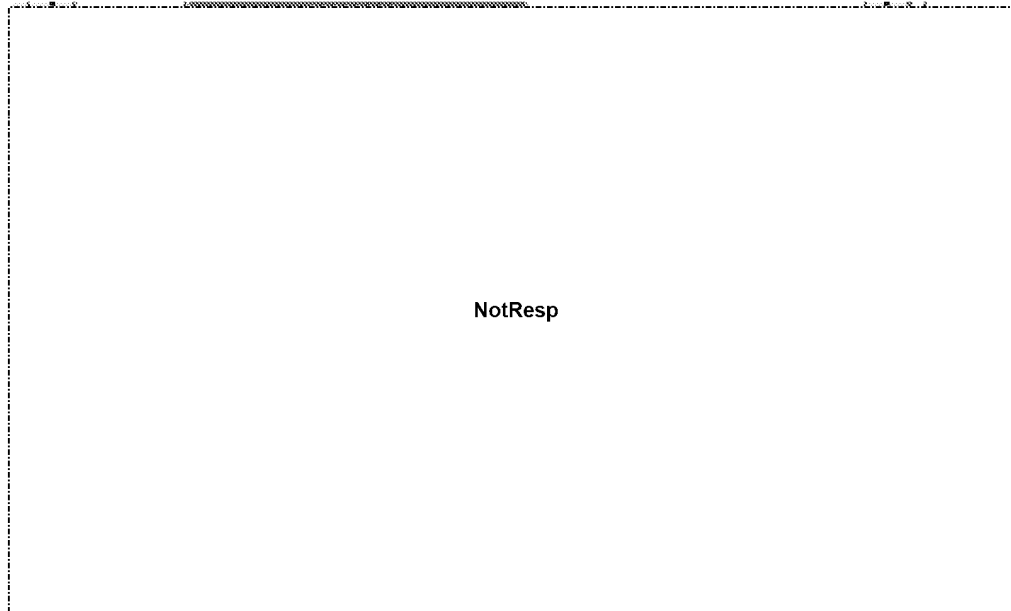
2.4.7 Configure **NotResp** Test Request Properties

The steps to configure the **NotResp** test request properties are as follows:

- Double-click the Test Step to open a Request/Response window on the right side.

- b. Click the **NotResp** properties tab on the bottom right side.
- c. Scroll down to select the SSL Keystore property and keystore.jks from the drop-down.

FIGURE 10 - TESTREQUEST PROPERTIES TAB

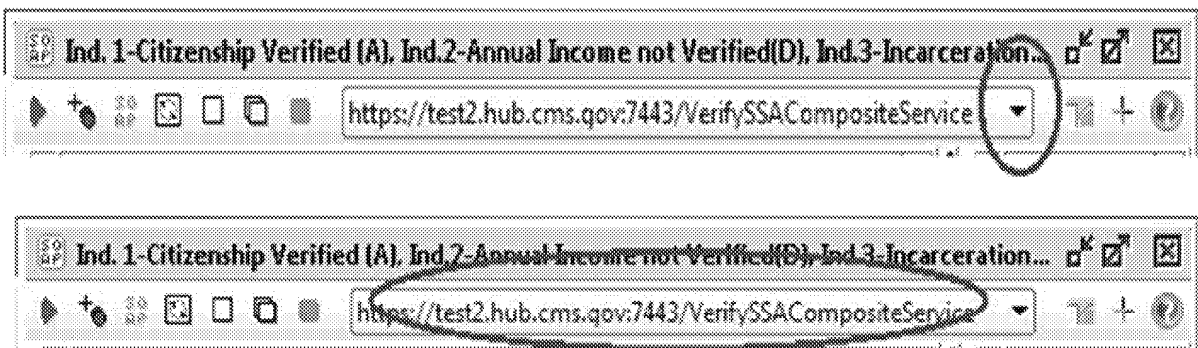


2.4.8 Configure **NotResp** Endpoint

The steps to configure the **NotResp** endpoint to use the DSH Gateway endpoint area are as follows:

- a. Click the endpoint drop-down and select *Add New Endpoint*.
- b. Enter the endpoint from the DSHSecurity group email, and click *OK*.

FIGURE 11 - ENDPOINT DROP DOWN

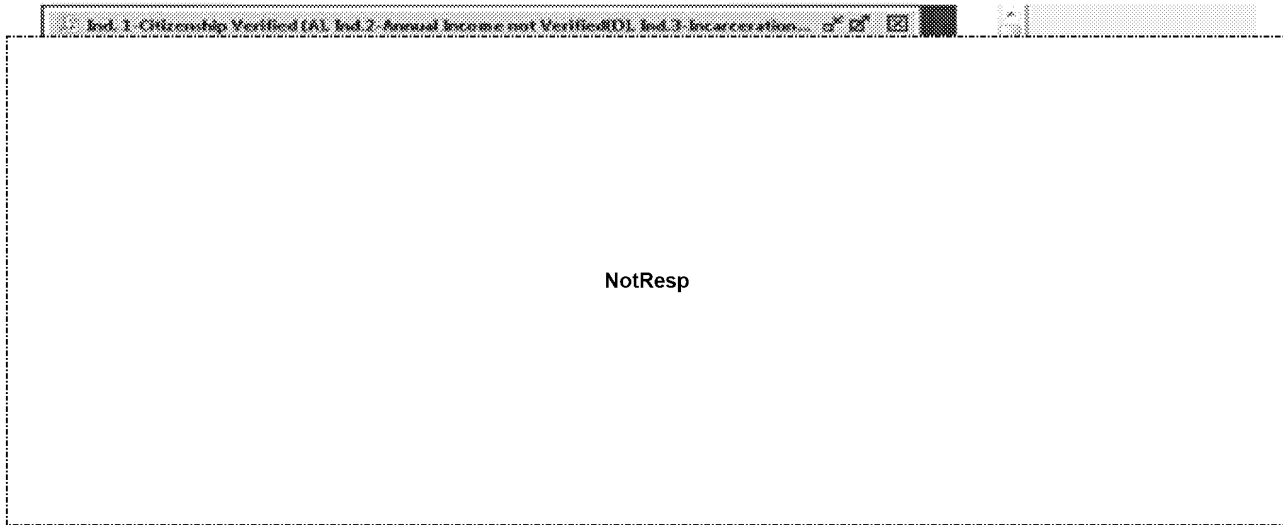


2.4.9 Configure **NotResp** to Add **NotResp** Header

The steps to configure **NotResp** to add **NotResp** are as follows:

- a. Select the Request tab, right click, select Outgoing **NotResp** then select Apply Outgoing.

FIGURE 12 - REQUEST TAB



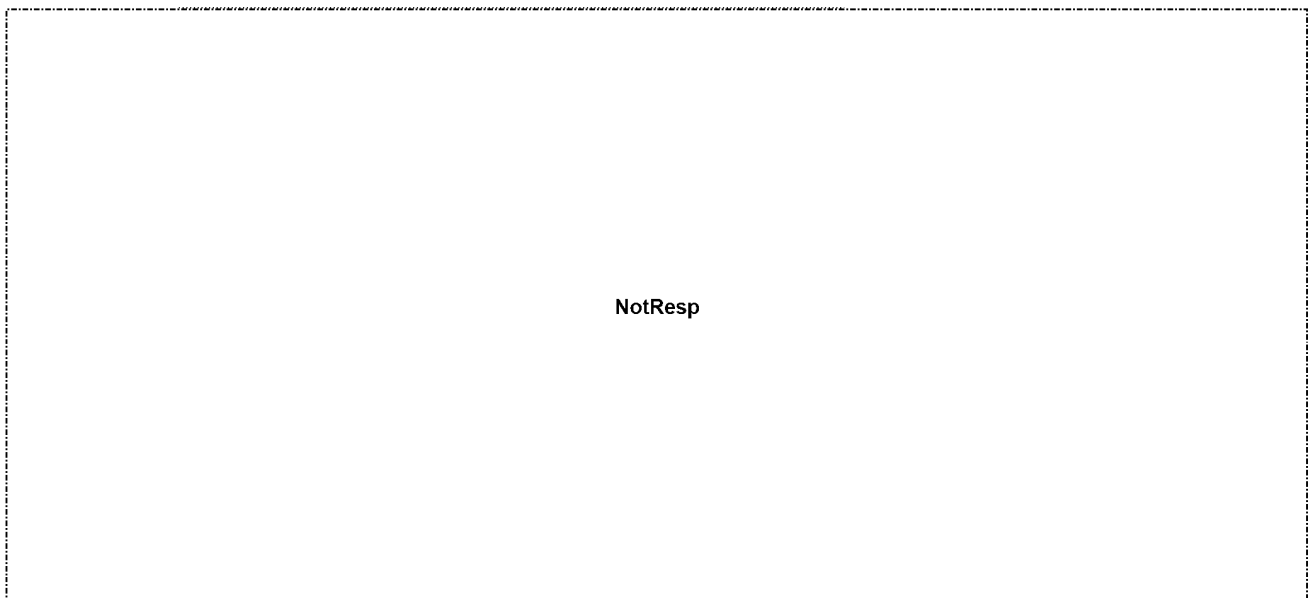
Note: This will insert the **NotResp** tag in the **NotResp** leader.

- b. Press Alt+F to reformat the newly inserted information to make it readable.
c. Run the test.

2.4.1 **NotResp** Security Test

Submit the **NotResp** request to receive a response from the Hub.

FIGURE 13 - REQUEST AND RESPONSE



Guidelines to retest the [NotResp] security are as follows:

- The [NotResp] feature uses a timestamp that expires every 1500 seconds. It was set up in [NotResp] timestamp configuration.
- Refresh the [NotResp] information if you want to re-test the same service after 1500 seconds.
- Right-click Request, select Outgoing [NotResp] and select Remove All Outgoing [NotResp]. This will remove all [NotResp] information.
- Right-click Request, select Outgoing [NotResp] and select Apply Outgoing. This will add [NotResp] information.
- Press Alt+F to auto format the newly inserted information.
- Run the test.

FIGURE 14 - REMOVE ALL OUTGOING WSS



2.5 Customer Support

The Requestors can contact QSSI at [NotResp]@qssinc.com in case they encounter problems accessing the DSH web services.

In the production environment the Exchange Operations Support Center (XOSC) is the central hub for providing help desk support for all Marketplace stakeholders. The XOSC help desk is responsible for operational inquiries and support resolution for the FFM, MIDAS, Hub, HIOS, NotResp and RBIS.

The help desk performs the following functions:

- Notify customers or service outages or disruptions: Notifications are also sent for all scheduled and unscheduled service outages one week prior to outage with the exception of an emergency change request.
- Log and manage trouble tickets identified by users: The XOSC will facilitate the resolution of trouble tickets through established reporting protocols and escalation procedures.

Methods of Contact

The XOSC operates the help desk from Monday to Friday from 9 a.m. until 5 p.m. (EST). To contact the help desk via phone, use: 1-855-CMS-1515 (1-855-267-1515). For evenings, weekends, or government holidays, you can initiate a request through email:

NotResp @cms.hhs.gov.



Centers for Medicare & Medicaid Services
Center for Consumer Information and Insurance Oversight
7500 Security Blvd
Baltimore, MD 21244-1850

Federally Facilitated Marketplace (FFM)
Direct Enrollment API for Web
Brokers/Issuers
Technical Specifications

Version: 1.3
Last Modified: May 10, 2013

Contract Number: HHSM-500-T0012

Federally Facilitated Marketplace (FFM)

APPROVALS

Submitting Organization's Approving Authority:

| | | | |
|-----------|--------------|------|--------------|
| Signature | Printed Name | Date | Phone Number |
|-----------|--------------|------|--------------|

CMS' Approving Authority:

| | | | |
|-----------|--------------|------|--------------|
| Signature | Printed Name | Date | Phone Number |
|-----------|--------------|------|--------------|

Federally Facilitated Marketplace (FFM)

REVISION HISTORY

[illegible]

Federally Facilitated Marketplace (FFM)

TABLE OF CONTENTS

| | |
|--|-----------|
| 1. Introduction | 1 |
| 1.1. Intended Audience | 3 |
| 1.2. Key Terms | 3 |
| 1.3. New Consumer Process Flow Diagram | 5 |
| 2. Key Considerations..... | 6 |
| 3. API Interaction Model | 8 |
| 3.1. System Context | 8 |
| 3.2. User Types Supported | 9 |
| 3.2.1. Consumers | 9 |
| 3.2.2. Agents and Brokers | 10 |
| 4. API Interaction Scenarios..... | 12 |
| 5. API Interfaces | 15 |
| 5.1. List of API Interfaces - UI Integration | 15 |
| 5.2. List of Interfaces - Web Services | 15 |
| 6. User Interface Integration | 17 |
| 6.1. Overview | 17 |
| 6.2. Technical Implementation | 17 |
| 6.2.1. Connectivity Pre-requisites | 17 |
| 6.2.2. Secure Transfer of Consumer between FFM and Partner Sites | 17 |
| 6.2.3. Web Services Interaction between Partner Site and FFM..... | 19 |
| 6.3. UI Integration Specification | 20 |
| 6.3.1. Transfer User from Partner Website to FFM (HTTP.WB.FFE.01) | 20 |
| 6.3.2. Transfer User Back to Partner Website (HTTP.FFE.WB.01)..... | 30 |
| 7. Web Services Integration | 39 |
| 7.1. Overview | 39 |
| 7.2. Technical Implementation | 39 |
| 7.3. Web Service Specifications | 40 |
| 7.3.1. Fetch Household/ Eligibility Details (WS.WB.FFE.01) | 40 |
| 7.3.2. Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) | 64 |
| Appendix A. Code Values/ Descriptions..... | 82 |
| A.1 Relationship Codes | 82 |
| A.2 SEP Reason Code | 82 |
| A.3 Maintenance Type Codes (Member Level) | 84 |
| A.4 Maintenance Reason Codes | 85 |
| Appendix B. Key Interaction Scenarios | 86 |
| B.1 Scenario #1a - New FFM Consumer (Consumer initiated direct enrollment) | 86 |
| B.1.1 Scenario Overview | 86 |
| B.1.2 Sequence of Activities..... | 87 |
| B.2 Scenario #1b - New FFM Consumer (Agent/Broker Initiated Direct Enrollment) | 91 |
| B.2.1 Scenario Overview | 91 |
| B.2.2 Sequence of Activities..... | 92 |
| B.3 Scenario #1c - New FFM Consumer (Consumer initiated lead generation) | 96 |

Federally Facilitated Marketplace (FFM)

| | | |
|-------|---|-----|
| B.3.1 | Scenario Overview | 96 |
| B.3.2 | Sequence of Activities..... | 96 |
| B.4 | Scenario #2 - Returning FFM Consumer | 100 |
| B.4.1 | Scenario Overview | 100 |
| B.4.2 | Sequence of Activities..... | 100 |
| B.5 | Scenario #3 - Reporting Changes Impacting Eligibility..... | 102 |
| B.5.1 | Scenario Overview | 102 |
| B.5.2 | Sequence of Activities..... | 102 |
| B.6 | Scenario #4 - Reporting changes not impacting eligibility | 106 |
| B.6.1 | Scenario Overview | 106 |
| B.6.2 | Sequence of Activities..... | 106 |
| B.7 | Scenario #5 - Reporting changes leading to Disenrollment | 108 |
| B.7.1 | Scenario Overview | 108 |
| B.7.2 | Sequence of Activities..... | 108 |
| B.8 | Scenario #6 - FFM Initiated Disenrollment..... | 111 |
| B.8.1 | Scenario Overview | 111 |
| B.8.2 | Sequence of Activities..... | 111 |
| B.9 | Scenario #7 - Voluntary Disenrollment by Consumer | 114 |
| B.9.1 | Scenario Overview | 114 |
| B.9.2 | Sequence of Activities..... | 114 |

Federally Facilitated Marketplace (FFM)

LIST OF FIGURES

| | |
|--|-----|
| Figure 1 - Web Broker/Issuer - Direct Enrollment API Process Flow | 5 |
| Figure 2 - FFM API Consumer Interaction Model | 8 |
| Figure 3 - New FFM Consumer | 86 |
| Figure 4 - New FFM Consumer (Agent/Broker Initiated Direct Enrollment) | 91 |
| Figure 5 - New FFM Consumer (Lead Generation) | 96 |
| Figure 6 - Returning FFM Consumer | 100 |
| Figure 7 - Reporting Changes Impacting Eligibility | 102 |
| Figure 8 - Reporting Changes not Impacting Eligibility | 106 |
| Figure 9 - Reporting Changes Leading to Disenrollment | 108 |
| Figure 10 - FFM Initiated Disenrollment | 111 |
| Figure 11 - Voluntary Disenrollment | 114 |

LIST OF TABLES

| | |
|--|----|
| Table 1 - API Interaction Scenarios | 12 |
| Table 2 - List of API Interfaces | 15 |
| Table 3 - List of API Interfaces | 16 |
| Table 4 - HTTP.WB.FFE.01 Security Considerations | 18 |
| Table 5 - HTTP.FFE.WB.01 Security Considerations | 18 |
| Table 6 - Transfer User from Partner Website to FFM - Request | 20 |
| Table 7 - Transfer User Back to Partner Website - Request | 30 |
| Table 8 - Fetch Household/ Eligibility Details - Request | 42 |
| Table 9 - Fetch Household/Eligibility Details - Response | 43 |
| Table 10 - Submit Enrollment/Change/Disenrollment Transaction - Request | 67 |
| Table 11 - Submit Enrollment/Change/Disenrollment Transaction - Response | 75 |
| Table 12 - Relationship Codes | 82 |
| Table 13 - SEP Reason Codes | 83 |
| Table 14 - Member Level Maintenance Type Codes | 84 |
| Table 15 - Maintenance Reason Codes | 85 |

Federally Facilitated Marketplace (FFM)

1. Introduction

This document presents the specifications for the Direct Enrollment Application Programming Interface (API) exposed by the Federally Facilitated Marketplace¹ (FFM) to Web Broker and Issuer websites (collectively referred to as partner websites in this document).

The purpose of the document is to communicate the overall approach to implementing the FFM Direct Enrollment API. The document identifies and provides an overview of various points of integration between partner websites and the FFM - User Interface Integration as well as web services integration. Future versions will enhance the content of this document with more specific business rules and integration specifications.

Consumers shopping for Health Insurance for themselves and/or their household members would have the choice of enrolling into a Qualified Health Plan (QHP) by accessing the FFM website directly or by shopping via a partner website. The API described in this document would facilitate integration between partner websites and the FFM to support consumers shopping/enrolling in Qualified Health Plans (QHPs) through partner websites.

The FFM will support two models for Partner websites to integrate their consumer shopping experience with the FFM:

- **Direct Enrollment API:** Under this model, partner websites will use User Interface Services and Web Services provided by the FFM to implement a consumer's eligibility determination and plan shopping functions.
- **Lead Generation API:** Under this model, partner websites will provide educational content and do pre-selling of their plans before transferring the consumer to the FFM website. The consumer will complete all functions including eligibility determination, plan shopping and enrollment on the FFM. However, the partner website will be able to specify Issuer/Plan filters that the FFM would apply as part of the consumer's plan shopping. This model is offered as an alternative to the Direct Enrollment API to support Issuers that may not be ready to implement the full Direct Enrollment API.

Determining Eligibility - Background Information

Consumers seeking to enroll in coverage through the Exchange need to submit an application to the FFM for determining eligibility for QHP and, if interested, for advance payment of premium tax credit (APTC) and cost-sharing reductions (CSRs). If determined eligible, the consumer can enroll into a QHP through the FFM. The eligibility determination process includes collection and verification of demographic and income information and verification of information from federal data sources such as the Social Security Administration (SSA) and Internal Revenue Service (IRS). As part of the application process, for individuals seeking financial assistance the FFM would also determine/assess household member's eligibility for Medicaid or CHIP. Individuals eligible for Medicaid or CHIP would not be eligible for financial assistance on the exchange and would be transferred by the FFM to the appropriate state agency for enrollment in Medicaid or CHIP.

¹ For purposes of this document, the term "Federally-facilitated Marketplace" also includes State Partnership Marketplaces.

Federally Facilitated Marketplace (FFM)

IRS regulations prohibit third party sites (such as those of Web Brokers and Issuers) from accessing Federal Tax Information (FTI). This restricts the ability to seamlessly integrate the eligibility application (even using web service calls to the FFM) as part of the shopping experience on a partner website. Also, the process for determining eligibility for Medicaid, CHIP, APTC, and CSR involves a complex UI workflow that is best implemented by the FFM. Consequently, a consumer trying to enroll in a QHP through a partner website would need to be transferred to the FFM to submit an eligibility application.

Direct Enrollment

In the direct enrollment process model, the consumer will be redirected to the FFM website to complete their eligibility application. Upon receiving an eligibility determination, the consumer would be transferred back to the partner website to continue plan shopping and selection for individuals eligible for a QHP, with or without financial assistance. It is worth noting that any individual(s) in the application determined eligible for Medicaid or CHIP would not be processed by the partner website.

Upon completion of plan shopping and selection in the direct enrollment model, the partner website would submit enrollment requests to the FFM through a web service invocation. The enrollment requests would be processed by the FFM and sent to the QHP Issuer. Section 1.3 New Consumer Process Flow Diagram illustrates the process flow for a consumer shopping for QHPs through a partner website.

The FFM Direct Enrollment API will provide partner websites access to FFM eligibility and enrollment business services through a combination of secure transfers of the consumer to and from the FFM website and web services. The secure transfer of the consumer between the FFM and the partner website would be used for submission of the eligibility application (for initial eligibility determinations as well as changes in circumstance). The plan shopping experience including submission of the plan selection would be implemented by the partner website using their own shopping and rating tools.

The endpoints for web services will be managed by the Federal Data Services Hub (DSH). The DSH will also manage Trading Partner Agreements, onboarding, and monitoring of the partner websites.

Lead Generation

The Lead Generation model is offered as an alternative to the Direct Enrollment API for Partner websites that will not be able to implement plan shopping and enrollment functions integrated with the FFM. Under this model, once transferred to the FFM, the consumer will remain on the FFM website for all functions including eligibility determination, plan shopping, and selection. The Lead Generation model will use a subset of the Direct Enrollment API services, namely the User Interface transfers. A partner website can transition to the full Direct Enrollment API when they are ready to implement web services integration with FFM.

Agents/ Brokers

Both the Direct Enrollment API and the Lead Generation API would also include support for licensed Agents and Brokers associated with the partner website. Agents and Brokers can use the API services to assist consumers with eligibility determination and enrollment. Please see section 3.2.2 Agents and Brokers for more information.

Document Organization

Federally Facilitated Marketplace (FFM)

The remainder of this document is organized as follows:

- Section 2 - Key Considerations
- Section 3 - API Interaction Model
- Section 4 - API Interaction Scenarios
- Section 5 - API Interfaces
- Section 6 - User Interface Integration
- Section 7 - Web Services Integration
- Appendix A - Code Values/ Descriptions
- Appendix B - Key Interaction Scenarios

Section 2 - Key Considerations lists the considerations driving the design of this API.

Section 3 - API Interaction Model illustrates the high level end-to-end interactions involving the partner website, the Federal Data Services Hub and the FFM.

Section 4 - API Interaction Scenarios lists the primary business scenarios that drive the interaction between the partner website and the FFM. Appendix B - Key Interaction Scenarios includes the sequence of activities, on the FFM as well as the partner website, corresponding to each of these scenarios. It is to be noted that other more complex scenarios can be addressed as combinations of these primary scenarios. For simplicity, the FFM and DSH have been treated as a single entity while presenting the sequence of activities.

Section 5 - API Interfaces lists the various interfaces/services to be provided by the FFM to support the interactions described in Section 4. For each interface a brief description is included along with the inputs and outputs for that interface.

Section 6 - User Interface Integration provides details on the interface between the partner website and the FFM to securely transfer the consumer to the FFM and back to the partner website.

Section 7 - Web Services Integration provides details on the web services that would be exposed by the FFM for partner websites to perform the plan shopping and selection process.

Appendix A includes lists of values for codes used in the interfaces along with their descriptions.

Appendix B includes the sequence of activities on the FFM as well as the partner website to complete the consumer's experience in each of the key scenarios identified in Section 4.

1.1. Intended Audience

The target audience for this technical specifications document is the business/technical stakeholders of the partner websites.

1.2. Key Terms

The key terms used in this document are:

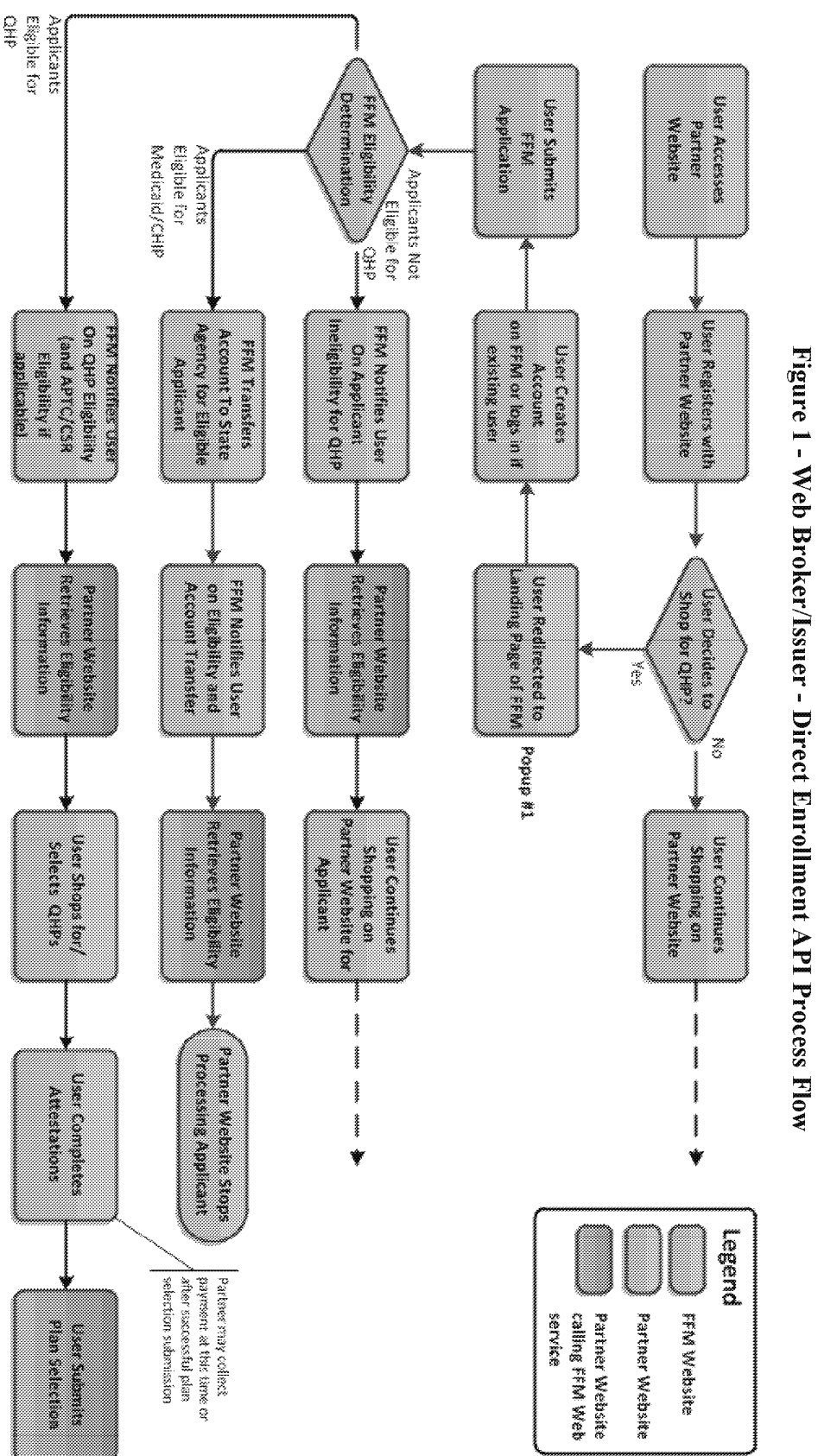
- Web Broker - A web-based entity licensed by a State as a broker and providing a website that consumers can use to shop for plans offered by multiple issuers, in compliance with 45 C.F.R. 155.220(c)(3) for individual market QHPs.

Federally Facilitated Marketplace (FFM)

- Issuer - An entity licensed by the State as an insurance producer that offers a QHP in accordance with a certification from an Exchange.
- Agent/Broker - A person licensed by the State as an agent, broker; may be independent, members of a brokerage or an employee of an issuer or a web-broker.
- Partner - Collectively, Web Brokers and Issuers are being referred to as partners.
- Applicant - An individual who wishes to apply or has applied for eligibility to enroll in a QHP.
- Consumer - A person who has engaged a Web Broker or Issuer seeking to enroll himself/herself and/or other applicants that they are associated with in a QHP. In relation to the applicants, the Consumer must be someone who is an adult who is in the applicant's household, as defined in 42 CFR 435.603(f), or family, as defined in section 36B(d)(1) of the Code, or if the applicant is a minor or incapacitated, someone acting responsibly for an applicant.

Federally Facilitated Marketplace (FFM)
1.3. New Consumer Process Flow Diagram

Figure 1 provides the Web Broker/Issuer new consumer process flow using the Direct Enrollment API.



2. Key Considerations

The following is a list of key considerations:

1. IRS regulations prohibit third party sites (such as Web Brokers and Issuer portals) from accessing Federal Tax Information (FTI). This restricts third parties' ability to verify income information that is integral to eligibility determination for Financial Assistance. Also, the eligibility determination process includes a complex orchestration of workflow/ business rules for Medicaid/CHIP eligibility (including state specific options) and QHP, APTC and CSR eligibility. These were the key drivers for the design approach that involves transferring the consumer to the FFM for completing the eligibility determination process.
2. Consumers can make both initial plan selection and changes through the partner websites using the direct enrollment process flow. Changes include changes in demographics, membership (add/remove members) and disenrollments.
3. The API interactions will include Web services as well as User Interface Integration with the FFM.
4. The User Interface Integration would involve secure transfer of the consumer to the FFM and back to the Issuer.
5. The consumer workflow would involve one transfer of the consumer to the FFM. The transfer would be for the consumer to create an account (or login to a previously created account) and fill out and submit an eligibility application.
6. Agents and Brokers would use the same workflow within the FFM as a consumer. However, there would be additional steps for Agents and Brokers for registering a consumer with the FFM or to associate with a consumer that is already registered with the FFM.
7. The interactions from Web Brokers and Issuers will largely be similar and supported by the same set of services exposed by the FFM. Variations in interactions will be realized through appropriate composition and parameterization of the API calls.
8. Partner websites will use the FFM Household/Eligibility web service to retrieve demographic and eligibility information on the applicants. The partner websites will also use the FFM enrollment web service to submit requests for initial enrollment, changes and disenrollments. The QHP shopping experience including plan search/compare, rating and plan selection will be supported by the partner websites using their own tools. HHS would provide Web Brokers a Public Use File (PUF) including information of QHPs to use as part of the plan shopping experience on their web sites.
9. For a consumer shopping directly on the partner website, the consumers will be required to maintain two accounts (User ID and Password), one on the partner website and the second on the FFM. Every time a consumer is transferred to the FFM, they would need to sign-in with their FFE User ID and Password. For a consumer shopping indirectly via a broker or agent, the consumer may have an FFM user ID and password (if they previously registered with the FFM), but is not required to have FFM web credentials.
10. The partner website will send the Information Exchange System ID (assigned by the DSH during onboarding of the partner) as part of all requests to the FFM (Transfer to the FFM as well as Web Service calls).

Federally Facilitated Marketplace (FFM)

11. The partner website will assign a unique Partner Assigned Consumer ID for each consumer and send that as part of all requests to the FFM API. The FFM will in turn assign an FFE Assigned Consumer ID and send to the partner website (along with the Partner Assigned Consumer ID) when the consumer is transferred back to the partner website.
12. The partner website will send the FFE Assigned Consumer ID in all web service requests to the FFM.
13. For the direct enrollment interaction model, when the consumer completes the eligibility workflow on the FFM website, the FFM will transfer the consumer back to the return URL provided by the partner website as part of the transfer to the FFM. The consumer will also be returned to the same URL in cases of exceptions such as failure to create an account, failed Remote Identity Proofing (RIDP) or inability to provide information required for eligibility determination. An exception code will be returned to the partner website to indicate the type of exception.
14. For the lead generation interaction model, when the consumer completes the plan shopping workflow on the FFM, the FFM will transfer the consumer back to the return URL provided by the partner website as part of the transfer to the FFM.
15. FFM will send all notices relating to eligibility directly to the consumer.
16. If a verification issue results during the application process, the FFM will interact directly with the consumer (notices/other forms of contact) to resolve the issue.
17. All consumer appeals will be handled by the FFM with the consumer directly interacting with the FFM Appeals process.
18. The Direct Enrollment API will not support enrollments into catastrophic plans. Consumers seeking to enroll one or more members of their household in a catastrophic plan would need to enroll directly on the FFM.

3. API Interaction Model

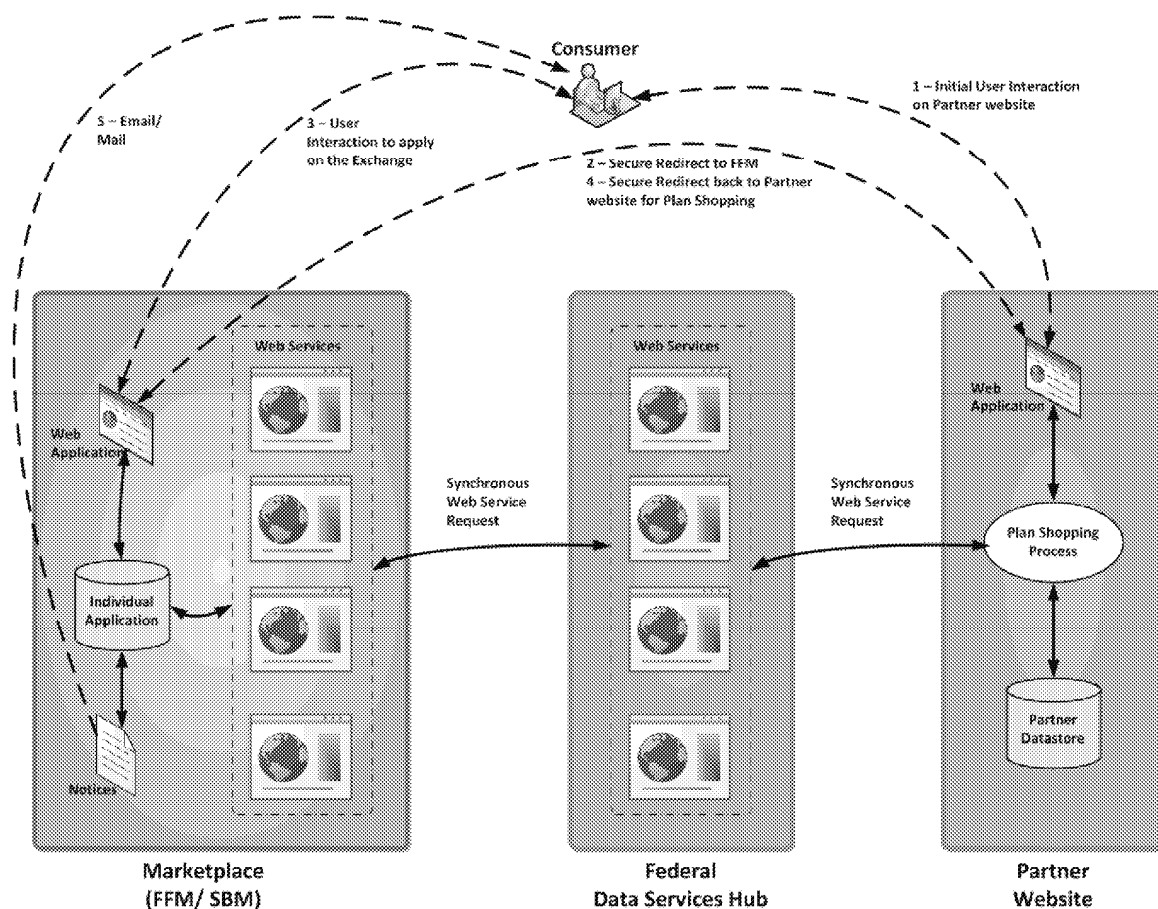
3.1. System Context

The FFM APIs for partner websites will support two types of interactions:

- Secure Transfer of Consumer to the FFM and Back - the consumer would be transferred to the FFM website to complete the eligibility workflow and then returned to the partner website
- Web Services - the partner website will invoke one or more web services exposed by the FFM

Figure 2 - FFM API Consumer Interaction Model illustrates the interactions of the consumer with the FFM and the partner website and also the interactions of the partner website with the FFM through the DSH.

Figure 2 - FFM API Consumer Interaction Model



The Secure Transfer interactions will occur directly between the FFM and the partner website. The return URL would be sent by the partner website as part of the transfer request to the FFM and will be used by the FFM to navigate the consumer back after they complete their tasks on the FFM. The FFM will send any notifications related to eligibility determination directly to the consumer via online notifications or mail. The partner website will be able to retrieve the eligibility information by invoking an FFM Web Service.

Federally Facilitated Marketplace (FFM)

The web services interactions between the FFM and partner websites will be routed through the Federal Data Services Hub (DSH). The FFM will manage the business process aspects of the web services and expose coarse grained business services that can be consumed by partner websites. The DSH will host the web services end points for all the FFM web services. The DSH will manage Trading Partner Agreements including onboarding of these partners. The DSH will also manage the security aspects of the web services.

All FFM web services will employ a standard Web Service Header that includes identifying information for the transaction with a custom payload for each type of transaction supported. The DSH will pass through the requests and responses by invoking the corresponding FFM services. The DSH will perform minimal inspection/actions and focusing on the authentication, auditing and monitoring functions of the interactions.

3.2. User Types Supported

The Direct Enrollment API and the Lead Generation Model are intended to support Consumers, Agents and Brokers who shop for and enroll into QHPs through a partner website. Since the interaction model includes UI Integration these users need to be registered on both the FFM as well as the partner website. This section describes the registration requirements for these users.

3.2.1. Consumers

3.2.1.1. Registration

This process applies to a consumer on the Individual Market trying to complete their plan shopping and enrollment activities through a partner website.

On the FFM, consumers would be registered similar to any consumer that directly accesses the FFM. The consumer would have to go through the CMS Enterprise Identity Management (EIDM) workflow that includes Remote Identity Proofing (RIDP) and setup of a User ID and password. Other requirements include setting up Security Questions (for Password Resets) as well as Assister Authorization Questions (similar to security questions, except these will be used to confirm the consumer's authorization for an Agent or Broker to work on their behalf). The same consumer credentials on the FFM apply regardless of whether the consumer accesses the FFM directly or through a partner website.

Partner websites have the choice of registering new consumers before redirecting them to the FFM or perform this function when they return from the FFM. With either model, duplicate data entry by consumer can be minimized by using contact information captured by one system being passed on to the other. Since, the partner website would be handling and presenting sensitive personal information received from the FFM via web services, the partner website's registration process would need to comply with Security standards provided by CMS. More details on this will be included in a future version of this document.

3.2.1.2. System Access and Workflow

Consumers registered with a partner website need to login to the partner website prior to accessing information from the FFM, either via redirect or behind the scenes via web services. Depending on the consumer's application status, they may need to be redirected to the FFM or continue on the partner website. If a consumer has not completed their application for eligibility determination or has returned to report a change in circumstance, the consumer would be redirected to the FFM to complete that process. In those situations, on reaching the FFM, the consumer would need to login using their FFM credentials. In all other interactions, the

Federally Facilitated Marketplace (FFM)

consumer would stay entirely on the partner website. The partner website would obtain the current eligibility status of the consumer's household from the FFM using a web service call and guide the consumer through the plan shopping or enrollment process on their website.

Consumers already registered with the FFM, directly or through a partner website, who try to access the FFM through a different partner website would need to be redirected to the FFM and Login with their FFM credentials to establish the link between their FFM application and their partner website account. These consumers can be registered either prior to accessing the FFM or after they return from the FFM. As part of establishing the link, the partner website and the FFM would exchange their respective identifiers for the consumer (Partner Assigned Consumer ID and FFE Assigned Consumer ID) to be used in all subsequent interactions.

3.2.2. Agents and Brokers

3.2.2.1. Registration

This process applies to Agents and Brokers supporting consumers in the Individual Market. A pre-requisite for these users (based on current policy) is that they should be licensed Agents or Brokers appointed by the Issuer with whom they are enrolling their customer. Users under this category would need to register with the FFM and satisfy the requirements of NIST Level 3 authentication requirements. This process would include Remote Identity proofing, completion of training and certification before the account is activated. These users will also need to be registered by the partner website through which they access the FFM. As part of their registration, the partner website would need to validate licensure and appointment information of the agent or broker.

3.2.2.2. System Access and Workflow

Agents and Brokers will start at a partner website and be redirected to the FFM for completing the application for eligibility determination for their consumer. On the FFM, they would land on an Agent/Broker home page where they can look up their consumer, if they already exist on the FFM or start a new application for the consumer for new FFM consumers. Depending on the final security model, there may be a need for the Agents and Brokers to login to the FFM using their FFM credentials when they are redirected to the FFM (final details will be provided in a future version of the document). When an Agent or Broker tries to look up an existing FFM consumer, they would need to provide responses (obtained from the consumer) to Assister Authorization Questions for the FFM to validate that the Agent or Broker has the consumer's authorization to access their account. On successful authorization, the FFM will associate the Agent or Broker with the consumer. Once the association is established the Agent/ Broker will be able to access the consumers account till the consumer explicitly removes the association or associates with a different Agent or Broker. For new FFM consumers, the Agent or Broker would need to take the consumer through Remote Identity Proofing to establish the association.

Once an Agent or Broker has been associated with a consumer, they can register the consumer with the FFM (if not already registered on the FFM) and complete their application for eligibility. A key difference in this registration process from that of the consumer accessing the Partner Website/FFM is that logon credentials would not be established for the consumer. In such cases, the consumer will need to register with the FFM (if not already done) and the FFM will associate their Logon credentials with the application created by the Agent or Broker.

The eligibility determination workflow for Agents and Brokers will be similar to that of consumers. The Agent or Broker will be redirected back to the partner website when they complete the eligibility determination process. On the partner website Agents and Brokers will

Federally Facilitated Marketplace (FFM)

use the shopping and enrollment tools of that website. The submission of enrollment transaction to the FFM will be performed by the partner website using the FFM Enrollment Web Service.

4. API Interaction Scenarios

Interactions between the partner website and the FFM will occur in a variety of business scenarios related to the consumer's situation with a corresponding list of steps/activities performed at either end. The interactions may vary depending on the type of partner website (Web Broker or Issuer) invoking the API. It is to be noted that the same set of FFM API will be used in each of these scenarios. Details of FFM API supporting these interactions are included in *Section 5 API Interfaces*.

Table 1 lists various business scenarios in which the FFM API will be invoked by a partner website. The sequence of steps/activities for each scenario is included in *Appendix B - Key Interaction Scenarios*.

Table 1 - API Interaction Scenarios

| Scenario | Scenario Description |
|--|---|
| Scenario #1a - New FFM Consumer: New FFM consumer through partner website for eligibility determination | <ol style="list-style-type: none"> 1. Consumer and/or applicants are not enrolled in a QHP 2. Consumer starts shopping for health insurance at the partner website and requests to enroll in a QHP (with or without financial assistance) 3. The partner website transfers the consumer to the FFM website for eligibility determination 4. After completion of eligibility determination by the FFM, consumer is transferred back to the partner website for comparing plans and selecting/enrolling in a plan 5. On completion of plan selection, the partner website will call a FFM web service to submit the enrollment request |
| Scenario #1b - New FFM Consumer (Agent/Broker Initiated Direct Enrollment): New FFM consumer through partner website for eligibility determination with assistance of an agent/broker | <ol style="list-style-type: none"> 1. Consumer and/or applicants may or may not be enrolled in a QHP (the scenario example, steps through when the consumer and/or applicants are not enrolled in a QHP) 2. Consumer starts shopping for health insurance at the partner website via an agent/broker and requests to enroll in a QHP (with or without financial assistance) 3. The partner website transfers the agent/broker to the FFM website for eligibility determination of the consumer 4. After completion of eligibility determination by the FFM, agent/broker is transferred back to the partner website for comparing plans and selecting/enrolling in a plan 5. On completion of plan selection, the partner website will call a FFM web service to submit the enrollment request |

Federally Facilitated Marketplace (FFM)

| Scenario | Scenario Description |
|---|---|
| <p>Scenario #1c - New FFM Consumer (Consumer initiated lead generation): New FFM consumer through partner website for eligibility determination (lead generation)</p> | <ol style="list-style-type: none"> 1. Consumer and/or applicants may or may not be enrolled in a QHP (the scenario example, steps through when the consumer and/or applicants are not enrolled in a QHP) 2. Consumer starts shopping for health insurance at the partner website and requests to enroll in a QHP (with or without financial assistance) 3. The partner website transfers the consumer to the FFM website for eligibility determination 4. After completion of eligibility determination by the FFM, FFM guides the consumer through comparing plans and selecting/enrolling in a plan (partner may have supplied a default filter for the plan results) 5. On completion of plan selection, FFM processes the enrollment selection and will transfer the consumer back to the partner website if a return URL is supplied and if the consumer wishes to do so. |
| <p>Scenario #2 - Returning FFM Consumer: Existing FFE consumer returning through partner website for eligibility determination.</p> | <ol style="list-style-type: none"> 1. Consumer and/or applicants are not enrolled in a QHP 2. During a prior session consumer started shopping for health insurance at the partner website and requested to enroll in a QHP. Consumer was transferred to the FFE for eligibility determination but did not complete the eligibility determination process. This process also applies to consumers who started shopping at the FFE and decided to go a partner website or those who started at one partner website and subsequently moved to a different partner website. 3. Consumer is now returning to continue the application for eligibility determination and shopping for health coverage 4. The partner website transfers the consumer to the FFE website for eligibility determination 5. After completion of eligibility determination by the FFE, consumer is transferred back to the partner website for comparing plans and selecting/enrolling in a plan 6. On completion of plan selection, the partner website will call a FFE web service to submit the enrollment request |
| <p>Scenario #3 - Reporting Changes Impacting Eligibility: Existing FFM consumer returning through partner website to report changes that impact eligibility</p> | <ol style="list-style-type: none"> 1. Consumer and/or applicants are enrolled in a QHP on the exchange 2. Consumer is now reporting changes such as: <ul style="list-style-type: none"> • Household income • Membership (add or remove members) • Residency • Demographic information (for one or more members) 3. The change impacts their eligibility for financial assistance and may also require/allow the consumer to change QHPs |
| <p>Scenario #4 - Reporting changes not impacting eligibility: Existing FFM consumer returning through partner website to report changes that do not impact eligibility</p> | <ol style="list-style-type: none"> 1. Consumer and/or applicants are enrolled in a QHP on the exchange 2. Consumer is now reporting changes such as: <ul style="list-style-type: none"> • Household income • Demographic information (for one or more members) • Residency 3. The change does not impact their eligibility for financial assistance and does not require/allow the consumer to change QHPs |

Federally Facilitated Marketplace (FFM)

| Scenario | Scenario Description |
|--|---|
| <p>Scenario #5 - Reporting changes leading to Disenrollment: Existing FFM consumer returning through partner website to report changes that lead to Disenrollment</p> | <ol style="list-style-type: none"> 1. Consumer and/or applicants are enrolled in a QHP on the exchange through a previous interaction from the partner website 2. Consumer is now reporting changes to their household information 3. One or more members of the consumer's household lose eligibility for QHP or APTC/CSR due to one or more of the following and may be subject to auto disenrollment unless the consumer takes action: <ul style="list-style-type: none"> • Change in lawful presence status • Change in residency status • Change in incarceration status • Change in household income • Gained employer sponsored health coverage • Gained eligibility for other public assistance for health coverage (Medicaid, CHIP, Medicare etc.) 4. Consumer may choose to continue QHP enrollment for impacted members without APTC/CSR or voluntarily terminate QHP enrollment for them. The exception to this is loss of eligibility for QHP, in which case the members impacted will always be disenrolled by the FFM <p><u>Note:</u> Disenrollment transactions can be performed only from a partner website associated with the issuer of the QHP policy.</p> |
| <p>Scenario #6 - FFM Initiated Disenrollment: Disenrollment initiated by FFM due to other events.</p> | <ol style="list-style-type: none"> 1. Consumer and/or applicants are enrolled in a QHP on the exchange through a previous interaction from the partner website 2. FFM re-determines eligibility for APTC/CSR due to one of the following <ul style="list-style-type: none"> • Expiry of period of reasonable opportunity to resolve a verification issue • Periodic data match 3. One or more members of the consumer's household lose eligibility for APTC/CSR due to one of the following and may be subject to auto disenrollment unless the consumer takes action: <ul style="list-style-type: none"> • Lost eligibility for APTC/CSR due to unresolved inconsistencies • Lost eligibility based on new information obtained through periodic data match • Gained eligibility for other public assistance for health coverage (Medicaid, CHIP, Medicare etc.) 4. Consumer may choose to continue QHP enrollment for impacted members without APTC/CSR or voluntarily terminate QHP enrollment for them. <p><u>Note:</u> Disenrollment transactions can be performed only from a partner website associated with the issuer of the QHP policy.</p> |
| <p>Scenario #7 - Voluntary Disenrollment by Consumer: Voluntary Disenrollment by FFM consumer through partner website</p> | <ol style="list-style-type: none"> 1. Consumer and/or applicants are enrolled in a QHP on the exchange through a previous interaction from the partner website 2. Consumer is voluntarily disenrolling from the QHP. <p><u>Note:</u> Disenrollment transactions can be performed only from a partner website associated with the issuer of the QHP policy.</p> |

5. API Interfaces

This section provides a list of all Interfaces supported by the FFM API to facilitate consumer interactions through partner websites.

Section 5.1- List of API Interfaces - UI Integration lists the Interfaces supported by the FFM API to support the secure transfer of a consumer to the FFM website and back to the partner website. The information structure (data elements) for the request and response for each of these interfaces is included in Section 6.3 - UI Integration Specification. The UI integration interfaces will be utilized by partner websites implementing the Direct Enrollment API as well as those implementing the Lead Generation Model.

Section 5.2 - List of Interfaces - Web Services lists the web services exposed by the FFM API to the partner website to support plan shopping, selection and submission of enrollment information. The information structure (data elements) for the request and response for each of these web services is included in Section 7.3 - Web Service Specifications. The Web Services interfaces are applicable to partner websites using the Direct Enrollment API only.

5.1. List of API Interfaces - UI Integration

Table 2 provides a list of API interfaces for UI integration.

Table 2 - List of API Interfaces

| Interface Identifier | Interface Name | Description |
|----------------------|---|---|
| HTTP.WB.FFE.01 | Transfer Consumer to FFM | This interface will facilitate secure transfer of the consumer from the Partner Website to the FFM to complete the application for eligibility or for reporting changes in circumstances. This interaction will also establish a link between the consumer's accounts on the Partner Website and the FFM. |
| HTTP.FFE.WB.01 | Transfer Consumer back to Web Broker/Issuer | This interface will facilitate secure transfer of the consumer back to the Partner Website from the FFM. The interface will be used in the following contexts: <ul style="list-style-type: none"> Completed Eligibility Application Voluntary return by consumer to partner website Return to partner website due to an exception The FFM will transfer the consumer to a Return URL provided by the partner website while transferring the consumer to the FFM. |

5.2. List of Interfaces - Web Services

Table 3 provides a list of API interfaces for web services.

Federally Facilitated Marketplace (FFM)

Table 3 - List of API Interfaces

| Interface Identifier | Interface | Description |
|-----------------------------|--|---|
| WS.WB.FFE.01 | Fetch Household/ Eligibility Details | Returns details of all applicants in the household requesting coverage along with their eligibility for financial assistance. Information returned will include: <ul style="list-style-type: none"> • Household contact information • List of household members that are applicants and their demographic/ eligibility information. Eligibility information would include details on the members eligibility for Medicaid, CHIP, Premium Tax Credits and CSR • Enrollment information for the household. |
| WS.WB.FFE.02 | Submit Enrollment/ Change/ Disenrollment Transaction | Process a new enrollment, an enrollment change or termination/cancellation of an enrollment. This service will accept and process the submitted request. Processed requests will be transmitted to the Issuer as x12-834 enrollment transactions. |

6. User Interface Integration

6.1. Overview

As described in earlier sections, the Partner Websites will need to redirect the end-user (consumer or agent/broker) securely to the FFM Website to conduct eligibility determination. At the end of the eligibility determination, the end-user will be redirected back to the Partner Site where the end-user can continue shopping and ultimately enroll.

This section and following subsections describe in detail how the following two transfers will be conducted:

- HTTP.WB.FFE.01 - Secure Inbound Redirect from Partner Website to FFM
- HTTP.FFE.WB.01 - Secure Outbound Redirect from FFM to Partner Website

Please note that several information parameters will be securely transferred between the Partner site and FFM and vice versa using HTTP POST during each of the redirects. These parameters are outlined in detail in sections 6.3.1.1 and 6.3.2.1 respectively. In addition, NotResp HTTP POST Binding (a W3C standard) will be used to secure and maintain the integrity of the information during these transfers. Further details on the security considerations and the NotResp assertions are also provided in the sections below.

6.2. Technical Implementation

6.2.1. Connectivity Pre-requisites

Before any partner website can interact with the FFM, the partner website would need to complete onboarding requirements with the Federal Data Services Hub (DSH). The companion document titled “Federal Data Services Hub (DSH) - Requester Onboarding Summary Document” outlines the protocol for interacting with the DSH including onboarding requirements.

The partner website would also need to comply with security requirements governing access to Federal Systems. This would include signing a Data Use Agreement with CMS to become an official partner.

6.2.2. Secure Transfer of Consumer between FFM and Partner Sites

Based on the item # 1 in *Section 2 - Key Considerations*, a user coming to the Partner Website needs to be transferred to the FFM website securely for eligibility determination purposes. Once the user completes their function on the FFM website they would be securely transferred back to the partner website.

To achieve this secure transfer, the following security considerations and corresponding provisions are proposed to be put in place for inbound transfer to the FFM and outbound transfer back to the partner website.

6.2.2.1. Securing Inbound Redirect from Partner Website to FFM (HTTP.WB.FFE.01)

Table 4 provides an overview of the security considerations and provisions required to secure the inbound http re-direct from Partner Website to FFM.

Federally Facilitated Marketplace (FFM)

Table 4 - HTTP.WB.FFE.01 Security Considerations

| Security Consideration | Security Provision | Additional Notes |
|---|--|---|
| <ul style="list-style-type: none"> Protect any data being transferred from Partner site to FFM Website Ensure that the user is being transferred to the authentic FFM Website | <ul style="list-style-type: none"> Leverage HTTPS protocol to transfer the user from the partner website to the FFM website | |
| <ul style="list-style-type: none"> FFM needs to authenticate and validate that the secure transfer request is coming from an authorized partner website FFM needs to securely receive parameters from the partner website related to the end-user and their purpose (eligibility, attestation, etc.) and make sure their integrity is not compromised | <ul style="list-style-type: none"> The partner website sends a NotResp using HTTP POST binding that contains the Information Exchange System ID issued to them during the onboarding process and a series of attributes related to the user and their purpose FFM validates the NotResp is from a trusted partner and accepts the secure inbound transfer. | <ul style="list-style-type: none"> More details on what the NotResp should contain are included in section 6.3.1 below. NotResp HTTP post binding provides a standards compliant way to authenticate the partner website as well as securely receive additional attributes in an extensible way. This is achieved by validating the digital signature of the NotResp |

6.2.2.2. Securing Outbound HTTP Redirect from FFM to Partner Site (HTTP.FFE.WB.01)

Table 5 provides an overview of the security considerations and provisions required to secure the inbound http re-direct from Partner Website to FFM.

Table 5 - HTTP.FFE.WB.01 Security Considerations

| Security Consideration | Security Provision | Additional Notes |
|--|---|--|
| <ul style="list-style-type: none"> Protect any data being transferred from FFM Website site to the Partner site - specifically the FFM Assigned Consumer to be used for subsequent web service requests | <ul style="list-style-type: none"> Leverage HTTPS protocol to transfer the user from FFM site to the Partner Site On completion of application submission or another event necessitating return of the consumer to the partner website, FFM will re-direct the consumer to a Return URL for the Partner Website that was sent to the FFM as part of transferring the consumer to the FFM. | <ul style="list-style-type: none"> The Return URL will be included in the transfer to the FFM from the partner website. |

Federally Facilitated Marketplace (FFM)

| Security Consideration | Security Provision | Additional Notes |
|--|--|--|
| <ul style="list-style-type: none"> • The Partner site needs to validate that the http redirect is coming from the FFM website • FFM needs to securely deliver parameters to the Partner site and make sure that the integrity is not compromised | <ul style="list-style-type: none"> • FFM sends a NotResp using the HTTP POST binding that contains the FFE Assigned Consumer ID that the Partner site can use for subsequent web service access • The Partner site validates the NotResp from FFM and accepts the http redirect. | <ul style="list-style-type: none"> • More details on what the NotResp should contain are listed in section 6.3.2 below. • NotResp HTTP post binding provides a standards compliant way to authenticate FFM as well as securely receive additional attributes in an extensible way. |

6.2.3. Web Services Interaction between Partner Site and FFM

Please refer to the companion document “Federal Data Services Hub (DSH) - Requester Onboarding Summary Document” for information on web services interactions with the FFM.

6.3. UI Integration Specification

6.3.1. Transfer User from Partner Website to FFM (HTTP.WB.FFE.01)

This secure transfer interface will transfer the user (the consumer or the agent/broker) from the Partner Website to the FFM for account creation and eligibility determination. This will establish a link between the consumer's accounts on the Partner Website and the FFM. The same transfer mechanism will be used by Partner websites using the Direct Enrollment API as well as those using the Lead Generation model. The transfers for the lead generation model will require additional fields listed in the table below to apply appropriate filters for the consumer.

6.3.1.1. Transfer User from Partner Website to FFM (HTTP.WB.FFE.01) - Request

Table 6 provides the data elements for the request from a partner website to transfer a user to the FFM.

Table 6 - Transfer User from Partner Website to FFM - Request

| Transfer Consumer from Partner Website to FFM (HTTP.WB.FFE.01) - Request | | | | | |
|--|--------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| NotResp <i>Protocol Response</i> | Response format | R | NotResp | String | |
| | Status Code format | R | | String | NotResp |
| | | | | | |
| NotResp | | | Contains Success or Failure | | |
| Core Attributes | | | | | |
| NotResp | | R | This should be the Information Exchange System ID issued to the partner website during the Data Services Hub onboarding process | String | |

Federally Facilitated Marketplace (FFM)

| Transfer Consumer from Partner Website to FFM (HTTP.WB.FFE.01) - Request | | | | | | |
|--|------------------------------------|--|---|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| | NotResp SubjectConfirmation Method | R | NotResp | String | | |
| | ds:Signature | R | | NotResp | | |
| SAML Extended Attributes | | | | | | |
| Consumer Identifiers | | | | | | |
| | State Exchange Code | R | Code indicating the specific state instance of the FFM on which the consumer will submit the application/changes. 2 Character State Abbreviation followed by a digit. The last position will always be NotResp | String | | |
| | Partner Assigned Consumer ID | R | Unique Identifier assigned by Partner Website for the consumer for interactions with the FFM. | String | | |
| | FFE Assigned Consumer ID | C | Unique Identifier assigned by the FFM for the consumer's eligibility determination interaction with the FFM. Required to indicate a returning user. | String | | NotResp |
| Transfer Information | | | | | | |
| | User Type | R | Type of the user logged on to the partner website Consumer Partner Call Center Rep Agent Broker | String | | |

Federally Facilitated Marketplace (FFM)

| Transfer Consumer from Partner Website to FFM (HTTP.WB.FFE.01) - Request | | | | | |
|--|----------------|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | FFE User ID | C | User ID of the current user on the FFM. Only applicable when User Type is Partner Call Center Rep, Agent or Broker. | String | NotResp |
| | Transfer Type | R | Direct Enrollment or Lead Generation Direct Enrollment - the FFM will redirect the user back to the Partner website after the eligibility determination to continue plan shopping on the Partner website. Lead Generation - the FFM will redirect the user back to the Partner website after plan shopping/enrollment. | String | |
| | Return URL | C | Partner Website URL to which the current user will be securely transferred back after their interaction with the FFM. Required for Transfer Type of direct enrollment, optional for lead generation. | String | |
| | Keep Alive URL | O | Partner Website URL which the FFM will periodically ping to prevent the current user's session on the partner website from expiring. | String | |
| Lead Generation | | | Additional attributes to facilitate plan shopping and enrollment submission in the lead generation process model where the applicant will remain on the FFM for plan shopping. | | |

Federally Facilitated Marketplace (FFM)

| Transfer Consumer from Partner Website to FFM (HTTP.WB.FFE.01) - Request | | | | | | |
|--|---------------------|--|--|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| | NPN | O | National Producer Number to be associated with any enrollments submitted as part of the current transfer session. Optional if Transfer Type is Lead Generation. Not applicable for direct enrollment since the NPN to be submitted with the enrollment transaction will be passed as part of the enrollment submission to FFM via the web service. | Number | | |
| | Plan Results Filter | O | A list of up to 10 Issuer/ QHP IDs for the FFM to filter plan results by. The IDs will need to be specified as a comma separated list. Note: The consumer will still have the ability to reset the filter if they wish view all plans available on the FFM. | String | | |
| Contact Information (Optional. Applicable only for New Consumer) | | | | | | |
| Contact Name | | | Optional contact name information collected by the partner that can be used to pre-populate the registration form for a new consumer. | | | |
| | First Name | O | First name of the contact person | String | | |
| | Middle Name | O | Middle name of the contact person | String | | |
| | Last Name | O | Last name of the contact person | String | | |
| | Suffix Name | O | Suffix of the contact person: Jr. Sr. II III IV | String | | |
| NotResp | | | | | | |

| Transfer Consumer from Partner Website to FFM (HTTP.WB.FFE.01) - Request | | | | | | |
|--|---------------|--|--|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| Contact Person Address | | | Optional address information collected by the partner that can be used to pre-populate the registration form for a new consumer. | | | |
| | Street Name 1 | O | Street address | String | | |
| | Street Name 2 | O | Apt/suite/etc. number | String | | |
| | City Name | O | Name of City | String | | |
| | State | O | State Code | String | | |
| | Zip Code | O | Zip Code | String | | |
| Demographic Information | | | Optional demographic information collected by the partner that can be used to pre-populate the registration form for a new consumer. | | | |
| | SSN | O | Social Security Number of the contact person. Must be 9 digits, numeric. First digit cannot be 0. First three digits cannot be between 900 and 999. All digits may not be the same. 4th and 5th and last 4 digits cannot be zeroes. | String | | |
| | Birth Date | O | Date of Birth of contact person Must be a valid date, year must be > 1912 and <= current year. Entered in YYYY-MM-DD format. Cannot be greater than current date. | Date | | |
| | Email Address | O | Email address of the contact person. | String | | |
| | Phone Number | O | Primary phone number of the contact person. | String | | |
| NotResp | | | | | | |

Sample – NotResp Protocol Responses

For the sample, User Type is Consumer and Transfer Type is Direct Enrollment.

Federally-Facilitated Marketplace (FFM)

NotResp

{ STYLEREF "Doc Name" * MERGEFORMAT } Version 1.3/May 10, 2013

{ PAGE * Arabic * MERGEFORMAT }

Federally-Facilitated Marketplace (FFM)

NotResp

{ STYLEREF "Doc Name" * MERGEFORMAT } Version 1.3/May 10, 2013

{ PAGE * Arabic * MERGEFORMAT }

Federally Facilitated Marketplace (FFM)

NotResp

{ STYLEREF "Doc Name" * MERGEFORMAT } Version 1.3/May 10, 2013

{ PAGE * Arabic * MERGEFORMAT }

NotResp

6.3.1.2. Response

If the NotResp is invalid, then an error message will be displayed to the user.

For Consumers, if the NotResp is valid, the user will be displayed the FFM Registration/Login Page. If the user has previously registered with the FFM, the user can login and they will be directed to last step in the eligibility application they were at during their prior interaction with the FFM. If they had previously completed the eligibility determination process, they will be taken to their My Account page. If the Consumer is new to the FFM, the Consumer can register with FFM to begin the application process.

Federally Facilitated Marketplace (FFM)
For agents and brokers, if the **NotResp** is valid then the user will be displayed the FFM Login Page to login using their FFM credentials. Once logged in, the agent/broker will be directed to the Agent/Broker landing page to begin registration of the consumer with the FFM and to establish the consumer's consent to work on their behalf. If the agent/broker is returning to assist a consumer already associated with the, the partner website will pass the FFE Assigned Consumer ID as part of the transfer. This would allow the agent/broker to skip the consumer registration step since the FFM would be able to validate that the agent/broker is associated with the consumer.

6.3.2. Transfer User Back to Partner Website (HTTP.FFE.WB.01)

This HTTP redirect interface will transfer the user (the consumer or the agent/broker) from the FFM to the partner website after completion of the eligibility determination process. This interface will also be used in other situations such as on the user's intent to return or exceptions such as failure to create an FFM account due to failure to **NotResp**. The FFM will transfer the user to the Return URL provided by the partner website while transferring the user to the FFM. The same transfer mechanism will be used for users returning as part of the Direct Enrollment API as well as the Lead Generation Model. The difference between the transfers under these two models is that under the Direct Enrollment API, the consumer will be transferred back after eligibility determination, whereas in the case of Lead Generation, the consumer will be transferred back after they complete plan shopping/ enrollment.

6.3.2.1. Transfer User Back to Partner Website (HTTP.FFE.WB.01) - Request

Table 7 provides the data elements for the FFM request to transfer a user back to the partner website.

Table 7 - Transfer User Back to Partner Website - Request

| Transfer User Back to Partner Website (HTTP.FFE.WB.01) - Request | | | | | |
|--|--|--|-----------------------------|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| NotResp <i>Protocol Response</i> | NotResp <i>Response Format</i> | R | NotResp | String | |
| | NotResp <i>Status Code format</i> | R | | String | |
| | NotResp | | | | |
| NotResp <i>Core Attributes</i> | | | Contains Success or Failure | | |
| | | R | FFM | String | NotResp |

Federally Facilitated Marketplace (FFM)

| Transfer User Back to Partner Website (HTTP.FFE.WB.01) - Request | | | | | | |
|--|--------------------------------|--|---|-------------------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| | NotResp | R | NotResp | String | | |
| | SubjectConfirmation Method | | | NotResp | | |
| | ds:Signature | R | | Digital Signature | | |
| Partner/ Consumer Identification | | | | | | |
| | Information Exchange System ID | R | Unique Identifier assigned to the Partner Website by the Federal Data Services Hub as part of the on boarding process for the partner | String | | |
| | State Exchange Code | R | Code indicating the specific state instance of the FFM on which the consumer will submit the application/ changes. 2 Character State Abbreviation followed by a digit. The last position will always be '0'. | String | | |
| | | | | | | |
| | Partner Assigned Consumer ID | R | Unique Identifier assigned by Partner Website for the consumer for interacting with the FFM. | String | | |
| | FFE Assigned Consumer ID | C | Unique Identifier assigned by the FFM for the consumer's eligibility determination interaction. | String | | |
| Transfer Information | | | | | | |
| | User Type | R | Type of the user logged on to the partner website <ul style="list-style-type: none"> • Consumer • Partner Call Center Rep • Agent • Broker | String | | |

{ STYLEREF "Doc Name" * MERGEFORMAT } Version 1.3/May 10, 2013

{ PAGE * Arabic * MERGEFORMAT }

Federally Facilitated Marketplace (FFM)

| Transfer User Back to Partner Website (HTTP.FFE.WB.01) - Request | | | | | |
|--|------------------|--|---|-----------|---------------------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | <div>Min LengthMax Length</div> |
| | FFE User ID | C | User ID of the current user on the FFM Only applicable when User Type is Partner Call Center Rep, Agent or Broker. | String | NotResp |
| | Transfer Type | R | Type of Transfer to the FFM <ul style="list-style-type: none">Completed Eligibility ApplicationException on eligibility applicationUser initiated return | String | |
| | Exception Reason | C | Code indicating the type of exception that occurred on the FFM. <ul style="list-style-type: none">Consumer failed Identity Proofing.Application in Pend Status.Application not completed.System Unavailable. Retry later.Data Sources Unavailable. Retry later. Will be set when Transfer Type is 'Exception on eligibility application'. | String | |

NotResp

Protocol Responses

For Sample 1, User Type is consumer and Transfer Type is Completed Eligibility Application.

NotResp

NotResp

Federally Facilitated Marketplace (FFM)

NotResp

{ STYLEREF "Doc Name" * MERGEFORMAT } Version 1.3/May 10, 2013

{ PAGE * Arabic * MERGEFORMAT }

NotResp

Federally Facilitated Marketplace (FFM)

For Sample 2, User Type is consumer and Transfer Type is Exception on Eligibility Application.

Obtained via FOIA by Judicial Watch, Inc.

NotResp

{ STYLEREF "Doc Name" * MERGEFORMAT } Version 1.3/May 10, 2013

{ PAGE * Arabic * MERGEFORMAT }

Federally Facilitated Marketplace (FFM)

NotResp

{ STYLEREF "Doc Name" * MERGEFORMAT } Version 1.3/May 10, 2013

{ PAGE * Arabic * MERGEFORMAT }

NotResp

6.3.2.2. Response

None

7. Web Services Integration

7.1. Overview

This section applies only to partner websites utilizing the Direct Enrollment API. The Direct Enrollment API would include two web services exposed by the FFM:

- WS.WB.FFE.01 - Fetch Household/Eligibility Details
- WS.WB.FFE.02 - Submit Enrollment/Change/Disenrollment Transaction

The “Fetch Household/Eligibility Details” web service would allow the partner website to query the FFM and fetch information on the household and eligibility information for members of the household. The response would also include current enrollment status of members in the household and any Enrollment Periods available for members to enroll and change plans. This information can be used by the partner website to tailor the plan shopping/ enrollment maintenance experience of the consumer.

The Submit Enrollment/Change/Disenrollment web service would allow the partner website to submit new enrollment and change transactions to the FFM for processing. The FFM will be the system of record for QHP enrollments and all enrollment-related transactions need to be processed on the FFM. The normal FFM enrollment workflow including sending x12-834 transactions to the Issuer would be executed when this web service is invoked.

7.2. Technical Implementation

The Web Services Interactions between Partner site and FFM will be brokered through the CMS Data Services Hub. The web services interaction will need to include the FFE Assigned Consumer ID that is issued at the completion of eligibility determination by the user that was transferred to the FFM website from the partner website.

All web services will be brokered through the CMS Data Services Hub and follow the same messaging standards established by the Hub Please refer to the companion document “Federal Data Services Hub (DSH) - Requester Onboarding Summary Document” for information on web services interactions with the FFM.

Federally Facilitated Marketplace (FFM)

7.3. Web Service Specifications

This section of the document presents details on web services exposed by the FFM. The following details are included for each web service

- **Service Description:** An overview of the service along with information on correct usage.
- **Key Business Rules/Constraints:** Business rules and constraints to be accounted for when using the web service as part of the process orchestration on the partner website
- **Request:** Information model for the web service request. Includes a list of data elements organized under structures of Segments and Data Element Groups. Information on the data elements include a description in the given context, data type, length, and optionality. Data Element Groups are a logical grouping of related data elements. A segment is collection of Data Element Groups.

7.3.1. Fetch Household/ Eligibility Details (WS.WB.FFE.01)**7.3.1.1. Service Description**

This FFM Web service is a query service that will return details of the consumer's household along with information on their eligibility for financial assistance. Information returned by this service will include:

- **Contact Person Information:** The contact person on the eligibility application (also referred to as the application filer) will be the same individual referred to as the consumer in the direct enrollment context. The web service will return the Name, Address, Birth Date, Telephone and contact preferences for the contact person.
- **Applicant Information:** An applicant is a member of the household listed on the application that is seeking health insurance coverage. There could be one or more applicants on the eligibility application and the web service will return information relating each of those applicants. The Applicant Information returned will include:
 - ... Identifying Information
 - Name, Address, and demographic information
 - Relationship to other applicants in the household
 - ... Eligibility Information: Information on eligibility for QHP with or without APTC/CSR, eligibility for Medicaid and CHIP. Eligibility Information will be included for the prior six months and any period in the future. Changes in eligibility will be communicated via distinct snapshots of eligibility details for the applicant over the prior six months onward.
 - ... Eligibility for Enrollment Periods: Details on whether the applicant is currently eligible for an Initial/Annual Enrollment Period and/or a Special Enrollment Period. The start and end dates associated with the enrollment periods will also be included.
 - ... Enrollment Information: Provides enrollment history over the prior six months and any periods in the future. Enrollment history will be organized as enrollment groups (Issuer Policy) and a list of members included in the enrollment group/policy.
 - Information on an enrollment group will include an Issuer ID, Assigned QHP ID, Issuer Policy Number, FFE Assigned Policy Number and Start and End dates of the policy. Please note that the Issuer Policy Number, Issuer ID and Plan ID will not be included if a consumer were to shop through a partner's website where the partner is not associated with the Issuer of the policy.

Federally Facilitated Marketplace (FFM)

- Information on members of the enrollment group will include
 - Identifying Information - FFE Assigned Applicant ID (a unique ID for a household member within the application), Issuer Assigned Member ID, FFE Assigned Member ID (a unique ID for the member within the context of that specific Issuer)
 - Subscriber information/relationship to subscriber
 - Start and end date of the member on the enrollment group including information on enrollment period used
 - Smoking status
 - Information on any pending auto disenrollments

7.3.1.2. Key Business Rules/ Constraints (TBD)

- Partner Assigned Consumer ID - This is a unique ID assigned by the Partner to the consumer which the FFM will pass back to the Partner when responding to requests from the Partner. The FFM expects the Partner to enforce uniqueness on this ID so FFM will not be enforcing uniqueness of the ID within FFM.
- FFE Assigned Consumer ID - FFM generates and assigns a Consumer ID as soon as FFM has sufficient information to create a basic account (i.e., prior to passing NotResp proofing) which subsequently become the primary identifier for the partner to use in retrieving the consumer's information. The FFE Assigned Consumer is only unique within the context of the given partner within a given exchange.
- Enrollment History - The exchange will only provide the full enrollment history details for enrollment in QHPs where the partner is affiliated with the Issuer of the QHP. For enrollment history of other QHPs where the partner is not affiliated with the QHP's Issuer, the exchange will only provide information regarding the covered timeframe.

7.3.1.3. Fetch Household/ Eligibility Details (WS.WB.FFE.01) - Request

Table 8 provides the data elements for the partner's request to retrieve current eligibility, eligibility history and enrollment history for members of the consumer's household.

Table 8 - Fetch Household/ Eligibility Details - Request

| Fetch Household/Eligibility Details (WS.WB.FFE.01) - Request | | | | | |
|--|--------------------------------|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| Partner/ Consumer Info | | | | | |
| | Information Exchange System ID | R | Unique Identifier assigned to the Partner Website by the Federal Data Services Hub as part of the onboarding process for the partner | String | |
| | User Type | R | Type of the user logged on to the partner website <ul style="list-style-type: none">• Consumer• Partner Call Center Rep• Agent• Broker | String | |
| | State Exchange Code | R | Code indicating the specific state instance of the FFM on which eligibility was determined. 2 Character State Abbreviation followed by a digit. The last position will always be '0'. | String | NotResp |
| | Partner Assigned Consumer ID | R | Unique Identifier assigned by Partner Website for the consumer for interacting with the FFM. | String | |
| | FFE Assigned Consumer ID | R | Unique Identifier assigned by the FFM for the consumer's eligibility determination interaction. | String | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (WS.WB.FFE.01) - Request | | | | | | |
|--|--------------|--|---|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| <i>User Identity Assertion</i> | | | Partner's assertion on the identity of the user on behalf of whom the web service call is made. | | | |
| | FFE User ID | C | Partner's assertion on the identity of the user on behalf of whom the web service call is made. Required when User is an Agent or a Broker. | String | | |
| | First Name | R | User ID of the user accessing FFM. Only applicable when User Type is Partner Call Center Rep, Agent or Broker. | String | | |
| | Middle Name | O | First name of the user accessing the FFM | String | | |
| | Last Name | R | Middle name of user accessing the FFM | String | | |
| | | | Last name of the user accessing the FFM | String | | |

7.3.1.4. Fetch Household/Eligibility Details (WS.WB.FFE.01) - Response

Table 9 provides data elements for the Fetch Household/Eligibility Details response.

Table 9 - Fetch Household/Eligibility Details - Response

| Fetch Household/Eligibility Details (WS.WB.FFE.01) - Response | | | | | | |
|---|--------------------------------|--|--|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| <i>Partner/ Consumer Info</i> | | | | | | |
| | Information Exchange System ID | R | Unique Identifier assigned to the Partner Website by the Federal Data Services Hub as part of the onboarding process for the partner | String | | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | | | |
|---|------------------------------|--|---|-----------|------------|------------|--|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length | |
| | State Exchange Code | R | Code indicating the specific state instance of the FFM on which eligibility was determined. 2 Character State Abbreviation followed by a digit. The last position will always be '0'. | String | NotResp | | |
| | Partner Assigned Consumer ID | R | Unique Identifier assigned by Partner Website for the consumer for interacting with the FFM. | String | | | |
| | FFE Assigned Consumer ID | R | Unique Identifier assigned by the FFM for the consumer's eligibility determination interaction with the given partner. | String | | | |
| Contact Person Information | | | | | | | |
| Contact Person Name | | | | | | | |
| | First Name | R | First name of the contact person | String | | | |
| | Middle Name | O | Middle name of the contact person | String | | | |
| | Last Name | R | Last name of the contact person | String | | | |
| | Suffix Name | O | Suffix of the contact person: • Jr. • Sr. • II • III • IV | String | | | |
| Contact Person Address | | | | | | | |
| | | | May include Home address and Mailing Address, if different. Home address will be included by default. If the contact person does not have a fixed address, only Mailing address will be included. | | | | |
| | Address Type Name | R | Name of Address Type Home Mailing | String | | | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|-------------------------|--|--|-----------|---------------------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | <div>Min LengthMax Length</div> |
| | Street Name 1 | R | Street address | String | |
| | Street Name 2 | O | Apt/suite/etc. number | String | |
| | City Name | R | Name of City | String | |
| | State | R | State Code | String | |
| | Zip Code | R | Zip Code | String | |
| <i>Contact Person Demographic Information</i> | | | Demographic information for the contact person on the application. | | |
| | SSN | O | Social Security Number of the contact person. | String | |
| | Birth Date | R | Date of Birth of the contact person. | Date | |
| <i>Telephone Number Group</i> | | | Telephone numbers of the contact person. May be multiple instances of Telephone Number Group | | NotResp |
| | Telephone Priority Type | R | Indicates if the phone number is preferred or secondary <ul style="list-style-type: none">PreferredSecondary | String | |
| | Phone Number | R | Phone Number to reach the contact. No alpha or symbols allowed. | String | |
| | Telephone Type Name | R | Type of phone to be used for contact: <ul style="list-style-type: none">HomeMobileWorkFriendEmployer | String | |
| | Extension | O | Extension of the telephone number. Numeric up to 6 digits | Integer | |
| | Email | O | Email address provided by the contact person. Will be used as the primary email for notifications. | String | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | | |
|---|----------------------------|--|--|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| Preferences | | R | Preferences for the household contact, including language preferences and contact preferences | | | |
| | Contact Method Type | R | Method the application filer would like to receive notices and notifications: <ul style="list-style-type: none">• US Mail• Electronic with Text Notification• Electronic with Email Notification | String | | |
| | Notification Cell Phone | C, required if Contact Method Type = Text | Cell phone number used to receive text notifications No alpha or symbols allowed | String | | |
| | Notification Email Address | C, required if Contact Method Type = Email | Email address used to receive electronic notifications Must contain “@”, may not contain spaces or start/end with a hyphen or contain two hyphens together. Cannot exceed 127 characters. | String | NotResp | |
| | Spoken Language | R | Single selection of preferred spoken language: <ul style="list-style-type: none">• English• Spanish• Vietnamese• Tagalog• Russian• Portuguese• Other | String | | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|--|---------------------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Written Language | R | Single-selection of preferred written language: <ul style="list-style-type: none">• English• Spanish• Vietnamese• Tagalog• Russian• Portuguese• Other | String | 1NotResp |
| <i>Application Type</i> | | | | | |
| | Requesting Financial Assistance | R | True - Applicants are seeking financial Assistance False - Applicants are not seeking financial assistance | Boolean | |
| Applicant Information (Will repeat for each applicant, i.e., household member who is seeking health insurance coverage. Household members on the application not seeking health insurance coverage will not be included.) | | | | | |
| <i>Applicant Identity</i> | | | | | |
| | FFE Assigned Applicant ID | R | Unique identifier for the applicant within the household. Only unique for that application, not a generally unique ID across the system. | Integer | |
| | | | Assigned by the FFM. | | |
| | SSN | O | Social security number of Applicant. No Dashes. | String | NotResp |
| <i>Applicant Name</i> | | | Name of the applicant | | |
| | First Name | R | First name of the Applicant | String | |
| | Middle Name | O | Middle name of the Applicant | String | |
| | Last Name | R | Last name of the Applicant | String | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|----------------|--|--|-----------|---------------------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | <div>Min LengthMax Length</div> |
| <i>Applicant Demographic Info</i> | Suffix Name | O | Suffix of the Applicant <ul style="list-style-type: none">• Jr.• Sr.• II• III• IV | String | NotResp |
| | | | Demographic information of applicant | | |
| | Birth Date | R | Date of birth of the Applicant. yyyy-mm-dd Must be a valid date, year must be > 1912 and <= current year. Entered in YYYY-MM-DD format. Cannot be greater than current date. | Date | |
| | Sex Name | R | Name of person's sex: <ul style="list-style-type: none">- Male- Female | String | |
| <i>Applicant Address</i> | Marital Status | O | Marital Status of the applicant <ul style="list-style-type: none">Y - MarriedN - Single | String | NotResp |
| | Student Status | O | Student Status of the Applicant <ul style="list-style-type: none">Y - Full Time StudentN - Not a Student | String | |
| | | | May include multiple addresses, if different. Home address will be included by default. If the applicant does not have a fixed address, only Mailing address will be included. | | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|-------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Address Type Name | R | Name of Address Type (multiple may apply to a single address) <ul style="list-style-type: none"> • Home • Mailing • Residency • Temporary • Intend to Reside | String | NotResp |
| | Street Name 1 | C | Street address of the address. PO Box is not permitted if address type is Home. | String | |
| | | | Required if not intend to reside address | | |
| | Street Name 2 | O | Apt/suite/etc. number of the address. | String | |
| | City | R | City of the address. | String | |
| | State | R | State Code (abbreviation) of the address. | String | |
| | Zip Code | R | Zip Code of the address. | String | |
| | County Name | C | Name of County using standard FIPS name. Will be included if Zip Code spans multiple counties. | String | |
| | County Code | C | County Code Will be included if Zip Code spans multiple counties. | String | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (WS.WB.FFE.01) - Response | | | | | |
|---|-----------------------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| <i>Applicant Eligibility</i> | | | Information on the type of healthcare coverage that the applicant is eligible for. This will include information on eligibility for Medicaid, CHIP, or QHP with or without APTC and CSR. There may be multiple instances of this information to provide snapshots of the applicant's eligibility over a period of time. The eligibility snapshots will reflect changes in the applicant's eligibility over the prior six months and the future. | | |
| | Eligibility Change Effective Date | R | Snapshot date or the Date on which there was a change to the applicant's eligibility for health insurance coverage. | Date | |
| | Medicaid Eligibility Indicator | R | Indicator for whether the applicant is eligible for Medicaid N - The applicant is not eligible for Medicaid Y - The applicant is eligible for Medicaid | String | NotResp |
| | Medicaid Eligibility Start Date | C | Start Date for eligibility for Medicaid. Will be included if Medicaid Eligibility Indicator is 'Y' | Date | |
| | Medicaid Eligibility End Date | C | End Date for eligibility for Medicaid. Will be included, if available and Medicaid Eligibility Indicator is 'Y'. | Date | |
| | CHIP Eligibility Indicator | R | Indicator for whether the applicant is eligible for CHIP N - The applicant is not eligible for CHIP Y - The applicant is eligible for CHIP | String | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|-----------------------------|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | CHIP Eligibility Start Date | C | Start Date for eligibility for CHIP. Will be included if CHIP Eligibility Indicator is 'Y'. | Date | NotResp |
| | CHIP Eligibility End Date | C | End Date for eligibility for CHIP. Will be included, if available and CHIP Eligibility Indicator is 'Y'. | Date | |
| | QHP Eligibility Indicator | R | Indicator for whether the applicant is eligible for QHP N - The applicant is not eligible for QHP Y - The applicant is eligible for QHP | String | |
| | QHP Eligibility Start Date | C | Start Date for eligibility for QHP. Will be included if QHP Eligibility Indicator is 'Y'. | Date | |
| | QHP Eligibility End Date | C | End Date for eligibility for QHP. Will be included, if available and QHP Eligibility Indicator is 'Y'. | Date | |
| | APTC Eligibility Indicator | R | Indicator for whether the applicant is eligible for APTC N - The applicant is not eligible for APTC Y - The applicant is eligible for APTC | String | |
| | APTC Eligibility Start Date | C | Start Date for eligibility for APTC. Will be included if APTC Eligibility Indicator is 'Y'. | Date | |
| | APTC Eligibility End Date | C | End Date for eligibility for APTC. Will be included, if available and APTC Eligibility Indicator is 'Y'. | Date | |
| | Monthly APTC Amount | C | Prorated Maximum APTC Amount for the applicant. Will be included if APTC Eligibility Indicator is 'Y'. | Amount | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | | |
|---|-------------------------------|--|---|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| | CSR Eligibility Indicator | R | Indicator for whether the applicant is eligible for CSR "N" - The applicant is not eligible for CSR "Y" - The applicant is eligible for CSR | String | NotResp | |
| | CSR Eligibility Start Date | C | Start Date for eligibility for CSR. Will be included if CSR Eligibility Indicator is 'Y'. | Date | | |
| | CSR Eligibility End Date | C | End Date for eligibility for CSR. Will be included if available and if CSR Eligibility Indicator is 'Y'. | Date | | |
| | CSR Level | C | CSR Level applicable to the applicant. Will be included if CSR Eligibility Indicator is 'Y'. 02 - Open to Members of Federally Recognized Tribes below 300%FPL 03 - Open to Members of Federally Recognized Tribes above 300%FPL 04 - 73% AV Level Silver Plan CSR 05 - 87% AV Level Silver Plan CSR 06 - 94% AV Level Silver Plan CSR | String | | |
| | QHP Eligibility Status Change | C | Indicator for any changes in QHP Eligibility status since the prior eligibility snapshot. • No Change • New Applicant for QHP • Gained Eligibility for QHP • Lost Eligibility for QHP Will be included after initial eligibility is determined for subsequent eligibility changes. | String | | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|--------------------------------|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | APTC Eligibility Status Change | C | Indicator for any changes in APTC Eligibility status since the prior eligibility snapshot. <ul style="list-style-type: none"> No Change Gained Eligibility for APTC Lost Eligibility for APTC Change in APTC Amount Will be included after initial eligibility is determined for subsequent eligibility changes. | String | NotResp |
| | CSR Eligibility Status Change | C | Indicator for any changes in APTC Eligibility status since the prior eligibility snapshot. <ul style="list-style-type: none"> No Change Gained Eligibility for CSR Lost Eligibility for CSR Change in CSR Level Will be included after initial eligibility is determined for subsequent eligibility changes. | String | |
| <i>Enrollment Period</i> | | | | | |
| | IEP/AEP Eligibility Indicator | R | Indicator for whether the applicant is eligible for an Initial Enrollment Period (IEP) or Annual Enrollment Period (AEP). <ul style="list-style-type: none"> Y - Eligible for IEP/AEP N - Not Eligible for IEP/AEP | Boolean | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|-------------------------------------|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | IEP/AEP Type | C | Indicator for the whether the enrollment period is an IEP or an AEP. I -Initial Enrollment Period A -Annual Enrollment Period Will be included if "IEP/AEP Eligibility Indicator" is 'Y'. | String | NotResp |
| | IEP/AEP Start Date | C | Date from which IEP/AEP is available. Will be included if "IEP/AEP Eligibility Indicator" is 'Y'. | Date | |
| | IEP/AEP End Date | C | Date until which IEP/AEP is available. yyyy-mm-dd. Will be included if "IEP/AEP Eligibility Indicator" is 'Y'. | Date | |
| | IEP/AEP Earliest QHP Effective Date | C | Earliest date the applicant's enrollment in a QHP can become effective. yyyy-mm-dd. Will be included if "IEP/AEP Eligibility Indicator" is 'Y'. | Date | |
| | IEP/AEP Latest QHP Effective Date | C | Latest date the applicant's enrollment in a QHP can become effective. yyyy-mm-dd. Will be included if "IEP/AEP Eligibility Indicator" is 'Y'. | Date | |
| | SEP Eligibility Indicator | R | Indicates whether the applicant is eligible for a Special Enrollment Period. Y - Eligible for SEP N - Not eligible for SEP | String | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | | |
|---|--|--|---|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| | SEP Eligibility Reason | C | Reason why SEP was granted. See Appendix A.2 SEP Reason Code for a list of SEP reasons. Will be included if “SEP Eligibility Indicator” is ‘Y’. | String | NotResp | |
| | SEP Start Date | O | Date from which SEP is available. yyyy-mm-dd. Will be included if “SEP Eligibility Indicator” is ‘Y’. | Date | | |
| | SEP End Date | O | Date until which the SEP is available. yyyy-mm-dd. Will be included if “SEP Eligibility Indicator” is ‘Y’. | Date | | |
| | SEP Earliest QHP Effective Date | C | Earliest date the applicant’s enrollment in a QHP can become effective. yyyy-mm-dd. Will be included if “SEP Eligibility Indicator” is ‘Y’. | Date | | |
| | SEP Latest QHP Effective Date | C | Latest date the applicant’s enrollment in a QHP can become effective. yyyy-mm-dd. Will be included if “SEP Eligibility Indicator” is ‘Y’. | Date | | |
| | Relationship to Other Applicants (repeat for each applicant besides the currently selected applicant) The FFE Assigned Applicant ID for each of the other household members in conjunction with a corresponding relationship code will communicate the relationships between this applicant and the rest of the household. This information will be used by the partner website for composing enrollment groups. | | | | | |
| Relationship to Other Applicants Information | | | | | | |
| | FFE Assigned Applicant ID | R | The FFE Assigned Applicant ID for another applicant within the household | Integer | NotResp | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|--|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Relationship to Applicant (CMS is continuing to work on final set of values for this list) | R | The relationship of the household member to the applicant. See Relationship Codes for the list of values. | String | NotResp |
| Other Person Information (Will repeat for person on the application besides the application contact and the applicants whose names needs to be provided to the partner for gathering APTC attestation. The other persons are persons who are tax filers and are not the application contact and are not applicants [household members seeking coverage]) | | | | | |
| Other Person | | | | | |
| | First Name | R | First name of the other person | String | NotResp |
| | Middle Name | O | Middle name of the other person | String | |
| | Last Name | R | Last name of the other person | String | |
| | Suffix Name | O | Suffix of the other person <ul style="list-style-type: none"> Jr. Sr. II III IV | String | |
| Existing Enrollment Information | | | | | |
| This existing policy information set of data elements will repeat to include information on all policies in the prior six months and any prospective policies. | | | | | |
| Enrollment Group Information | | | | | |
| | | | Includes information on a group of applicants enrolled in a health insurance plan together. This corresponds to a policy issued by an Issuer under which one or more application members are enrolled. | | |
| | FFE Assigned Policy Number | R | Unique ID assigned by the FFM for the policy. | String | NotResp |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|----------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Issuer Policy Number | C | Unique ID assigned by the Issuer for the policy. Will only be included if the partner is associated with the Issuer of the policy. | String | NotResp |
| | Start Date | R | Effective date on which coverage commenced under the policy. In case of a cancelled enrollment, this will be the date on which the policy would had commenced. | Date | |
| | End Date | C | Effective date on which coverage under the policy ended. | Date | |
| | Enrollment Status | R | Required when Enrollment Status is Terminated. Status of the enrollment: <ul style="list-style-type: none"> • Pending Effectuation • Cancelled • Effectuated • Terminated | String | |
| | Issuer ID | C | Issuer of the Policy. Will only be included if the partner is associated with the Issuer of the policy. | String | |
| | Assigned QHP ID | C | Assigned QHP ID for the policy. Will only be included if the partner is associated with the Issuer of the policy. | String | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|--|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| <i>Premium Information</i> | | | The details of the premium information for the enrollment group for a time period within the Enrollment Group Start Date and the Enrollment Group End Date. There may be multiple instances of Premium information for an enrollment group. | | |
| | Premium Start Date | C | Date from which the premium information is applicable. Will only be included if the partner is associated with the Issuer of the policy | Date | NoResp |
| | Premium End Date | O | Date till which the premium information is applicable | Date | |
| | Total Premium Amount | C | Total premium amount for the enrollment group | Amount | |
| | Maximum Enrollment Group Eligible APTC | C | For the enrollment group, the maximum allowed APTC amount for all applicants eligible to receive APTC, as determined in eligibility. Will only be included if the partner is associated with the Issuer of the policy | Amount | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FEE.01) - Response | | | | | | |
|---|--|--|---|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| | APTC Elected % | C | Percent of the maximum APTC elected by the consumer to apply towards premium costs. | Double | | |
| | | | Will not be sent if the % is not the same for all individuals or if this is not applicable because the applicants were not seeking financial assistance. | | | |
| | APTC Applied Amount | C | Total amount of APTC elected by the consumer for the enrollment group. Will not be sent if APTC is not applicable (i.e., no financial assistance application) | Amount | | |
| | | | Will only be included if the partner is associated with the Issuer of the policy | | | |
| | Total Individual Responsibility Amount | C | Net premium amount (after applying the APTC amount elected) that will be paid by the consumer. Will only be included if the partner is associated with the Issuer of the policy | Amount | | |
| Member Information | | | Information on a household member included in the policy. This group of information will repeat for each member in the policy. It is to be noted that members may be added or removed from a policy at different points in time within the start and end dates of the policy. | | | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | |
|---|----------------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | FFE Assigned Applicant ID | R | Unique identifier for an applicant member within the household corresponding to the member of the policy. Only unique for that application, not a generally unique ID across the system. Assigned by the FFM. | Integer | NotResp |
| | Start Date | R | Date on which coverage started for this household member on this policy. | Date | |
| | End Date | O | Date on which coverage ended for this household member on this policy. | Date | |
| | FFE Assigned Member ID | C | Unique ID assigned to each member enrolled with an Issuer. This ID is unique for an individual within the context of an Issuer. Will only be included if the partner is associated with the Issuer of the policy. | String | |
| | Issuer Assigned Member ID | C | Unique ID assigned by the Issuer of the policy for the member. Will only be included if the partner is associated with the Issuer of the policy. | String | |
| | Subscriber Indicator | R | Y - Yes N - No | String | |
| | Relationship to Subscriber | R | Code indicating the relationship of this member to the subscriber. See Appendix A.1 Relationship Codes for list of valid values. | String | |
| | Tobacco Use Indicator | R | Indicator to whether the member currently uses Tobacco products or has used Tobacco products in the past. N - Not a Tobacco user Y - Yes, a Tobacco user | Boolean | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (WS.WB.FFE.01) - Response | | | | | |
|---|--------------------------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Last date of Tobacco Use | C | Last date on which the applicant used tobacco products. This will be required when Tobacco Use Indicator is 'Y'. | Date | NotResp |
| | Enrollment Period Type | R | Indicator for Enrollment Period Type used for the enrollment I - Initial Enrollment Period A - Annual Enrollment Period S - Special Enrollment Period | String | |
| | Special Enrollment Reason Code | C | Reason for Special Enrollment Period. Will be included "Enrollment Period Type Indicator" is 'S'. See Appendix A.2 SEP Reason Code for a list of values. | String | |
| | Cancellation/Termination Reason Code | C | Maintenance type code corresponding to the reason for disenrollment. See Appendix Maintenance Reason Codes for a list of valid values. Will be included when "Enrollment Status" is 'Cancelled' or 'Terminated'. | String | |
| | Auto Disenrollment Pending Indicator | O | Y - Yes N - No | Boolean | |
| | Auto Disenrollment Reason | C | Will be included when "Auto Disenrollment Pending Indicator" is 'Y'. • Loss of APTC Eligibility due to gaining Medicaid/CHIP • Loss of Eligibility for APTC/CSR due to other eligibility criteria including Income and household size | String | |

Federally Facilitated Marketplace (FFM)

| Fetch Household/Eligibility Details (W.S.W.B.FFE.01) - Response | | | | | | |
|---|---|--|--|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| | Auto Disenrollment Effective Date | C | First date on which health insurance coverage will become unavailable under this policy. Will be included when "Auto Disenrollment Pending Indicator" is 'Y'. | Date | NotResp | |
| | Auto Disenrollment Scheduled Date | C | Date on which auto disenrollment will be processed. Will be included when "Auto Disenrollment Pending Indicator" is 'Y'. | Date | | |
| | Auto Disenrollment Cancelled by Application Contact Indicator | C | Indicator to whether the application contact has indicated their intent to continue the enrollment without APTC/CSR and hence cancelled the auto disenrollment <ul style="list-style-type: none"> Y - Yes N - No Will be included when "Auto Disenrollment Pending Indicator" is 'Y'. | Boolean | | |
| | Auto Disenrollment Cancelled Date | C | Date on which Application Filer indicated their intent to continue the enrollment without APTC/CSR. Will be included when "Auto Disenrollment Pending Indicator" is 'Y' and if response to "Auto Disenrollment Cancelled by Application Filer Indicator" is 'Y'. | Date | | |

Federally Facilitated Marketplace (FFM)

7.3.2. Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02)

7.3.2.1. Service Description

This FFM web service will process an enrollment request from the partner website. The request could be a new enrollment or changes to existing enrollments, including terminations/cancellations. The request may include information on one or more enrollment groups for the given household. The FFM will validate the information in the request against information on the application (including eligibility). FFM will also validate the premium computation, APTC applied and CSR Level prior to processing the enrollments. If information on any of the enrollment groups fails validation checks the entire request will be rejected. Requests that pass all validation checks will be processed by the FFM and enrollment details communicated to the Issuer via x12-834 transaction.

7.3.2.2. Key Business Rules/Constraints

The key business rules and constraints are:

- Applying APTC - As part of the Fetch Eligibility service, the Exchange will provide the maximum APTC that can be applied based on their eligibility at an individual level. The APTC to be applied to the enrollment selection is then further adjusted as follows:
 - The partner will gather from the consumer a single percentage of the APTC to be used which then needs to be applied to every applicant's individual APTC amount. For example: Person A and Person B are applicants with individual APTC amounts of \$100 and \$60 respectively. The consumer wants to only use 50% of the APTC. The individual APTC amounts would be reduced for Person A and Person B to \$50 and \$30, respectively.
 - Once the applicants are grouped into enrollment groups, the amount of APTC to be applied to the policy is the lesser of either the summed individual APTC amounts after applying rule 1 above or the summed EHB portion of the premium for the enrollment group. Continuing with the example above, if Person A and B enroll together in a plan where the EHB portion of the premium is \$90, the APTC applied to the policy will be \$80 (\$50 + \$30). If instead the EHB portion of the premium was \$70, the APTC applied to the policy would be \$70.
- Obtaining APTC Attestation – As part of the Fetch Eligibility service, the FFM would have provided the names of the persons who may be the tax filer since the tax filer(s) may be the application contact, applicants or other persons provided by FFM. The partner will need to have the consumer select the tax filers from the persons provided and for each person the consumer selects as a tax filer, provide an APTC attestation for the person. When the FFM receives the attestation information, the FFM will validate that the persons which have attestations match the tax filers on the application. A change is planned for a future version to indicate which persons are tax filers and allow partners to collect attestations for the specific people identified as tax filers.
- Assigning CSR level - If an enrollment group includes individuals that are eligible for different CSR Levels, the CSR level applied to the enrollment group as a whole would be the least beneficial CSR level that a member in the enrollment group is eligible for. The following is a list of CSR levels that could apply to various members of a household. More detailed information on

Federally Facilitated Marketplace (FFM)

appropriate application of a CSR level for an enrollment group will be included in future versions of this document.

1. (Variant = 01) Individuals not eligible for CSRs
2. (Variant = 03) Individuals who are Indians enrolled in a QHP that are furnished an item or service directly by the Indian Health Service, an Indian Tribe, Tribal Organization, or Urban Indian Organization or through referral under contract health services shall have no cost-sharing imposed under the plan for such item or service.
3. (Variant = 04) Individuals who are expected to have a household income greater than 200 percent of FPL and less than or equal to 250 percent of FPL for the benefit year.
4. (Variant = 05) Individuals who are expected to have a household income greater than 150 percent of the FPL and less than or equal to 200 percent of the FPL for the benefit year and for which coverage is requested.
5. (Variant = 06) Individuals who are expected to have a household income greater than or equal to 100 percent of FPL and less than or equal to 150 percent of FPL for the benefit year for which the coverage is requested, or an individual who is eligible for APTC under the special rule for non-citizens who are lawfully present and who are ineligible for Medicaid by reason of immigration status, that have a household income less than 100 percent of FPL for the benefit year for which coverage is requested.
6. (Variant = 02) Individuals who are Indians that are eligible for CSRs under the general requirements and have a household income that does not exceed 300 percent of FPL
 - Note: This rule does not preclude qualified individuals with different levels of eligibility for CSRs from enrolling in separate policies to secure the highest CSRs for which they are respectively eligible.

• Applying Enrollment Periods

- Rules surrounding Enrollment Periods will be included in a future version of this document.

• Submitting Initial Enrollments

- While submitting Initial Enrollments, the request shall include information at the policy level as well as member level information on all members to be included in the enrollment group.
- If members to be included in an enrollment group are currently enrolled (either under a plan offered by an Issuer associated with the partner website or otherwise), the request shall only include information on the new enrollment

Federally Facilitated Marketplace (FFM)

group. As part of processing the enrollment request, the FFM will automatically terminate the coverage of the members from their prior enrollment.

- While processing an initial enrollment request, the FFM will validate that all members of the household determined eligible for APTC will be enrolled after processing the request. This could include situations when all members of the household are enrolling together (as part of one or more enrollment groups) or part of the household is changing plans, either as an entire enrollment group or splitting or merging enrollment groups

• Enrollment/Policy changes

- A partner website may help any consumer through submitting eligibility changes. However, a partner website may allow enrollment/policy changes (change in membership as well as other changes to the policy) only if all enrollments associated with the consumer's application were submitted through the partner website. The FFM would address the enrollment changes directly resulting from eligibility changes such as those resulting from periodic redeterminations. While submitting changes to existing policies, the request will include information at the policy level and specific members for whom the changes apply. If there are no member specific changes, member level information need not be included.

• Situations involving Auto Disenrollment

- When a partner is enrolling applicants that are switching from one QHP to another QHP, the partner will only submit the enrollment for the new QHP and the Exchange will submit the cancellation/termination for the previously selected QHP.
- Partner may only submit consumer voluntary termination for enrollments in QHPs where the partner is affiliated with the QHP's Issuer.
- When a partner submits a change for a consumer that results in applicants being auto-disenrolled due to eligibility changes, the exchange will initiate the auto-disenrollment. The below situations detail when the exchange will initiate auto-disenrollment:
 - Applicant that is currently in a QHP gains Medicaid or CHIP eligibility which also means the person is no longer eligible for APTC and CSR. The exchange will transfer the applicant to Medicaid or CHIP and set a clock to terminate the applicant's QHP coverage unless the consumer responds prior to the clock expiring to keep the applicant in the QHP coverage without financial assistance.
 - Applicant that loses QHP eligibility will be terminated from QHP per the termination date rules defined in CFR 155.430.
- Voluntary Disenrollments
 - Rules surrounding Voluntary disenrollments will be specified in a future version of this document.
- Premium, APTC and CSR

Federally Facilitated Marketplace (FFM)

- The FFM will calculate the Premium amount for each enrollment group/policy, apply the applicable APTC amount and compare with the information sent as part of the request. If the amounts do not match, the request will be rejected along with the correct amounts. The same check applies to the CSR level for each enrollment group/policy.

7.3.2.3. Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Request

Table 10 provides the data elements to be included in a request to initiate enrollment, change enrollment or disenroll one or members of the consumer's household.

Table 10 - Submit Enrollment/Change/Disenrollment Transaction - Request

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Request | | | | | | |
|---|--------------------------------|--|--|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| Partner/ Consumer Identification | | | | | | |
| | Information Exchange System ID | R | Unique Identifier assigned to the Partner Website by the Federal Data Services Hub as part of the onboarding process for the partner | String | NotResp | |
| | User Type | R | Type of the user logged on to the partner website <ul style="list-style-type: none">• Consumer• Partner Call Center Rep• Agent• Broker | String | | |
| | State Exchange Code | R | Code indicating the specific state instance of the FFM on which eligibility was determined. 2 Character State Abbreviation followed by a digit. The last position will always be '0'. | String | | |
| | Partner Assigned Consumer ID | R | Unique Identifier assigned by Partner Website for the consumer for interacting with the FFM. | String | | |
| | FFE Assigned Consumer ID | R | Unique Identifier assigned by the FFM for the consumer's eligibility determination interaction. | String | | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Request | | | | | |
|---|---------------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| <i>User Identity Assertion</i> | FFE User ID | C | User ID of the user submitting the enrollment to FFM. | String | |
| | | | Partner's assertion on the identity of the user on behalf of whom the web service call is made. Required when User is an Agent or a Broker. | | |
| | | | Only applicable when User Type is Partner Call Center Rep, Agent or Broker. | | |
| | First Name | R | First name of the user accessing the FFM | String | |
| | Middle Name | O | Middle name of user accessing the FFM | String | |
| | Last Name | R | Last name of the user accessing the FFM | String | |
| Agent/ Broker Information | | | | | |
| <i>Agent/ Broker Identification</i> | | | | | NotResp |
| | Agent Or Broker Indicator | R | Indicator for whether the information relates to an Agent or Broker | String | |
| | | | <ul style="list-style-type: none"> Agent Broker | | |
| | National Producer Number | R | National Producer Number of Agent/ Broker | String | |
| | Agent/ Broker First Name | R | First name of the Agent/ Broker to be associated with the enrollment transaction | String | |
| | Agent/ Broker Middle Name | O | Middle name of the Agent/ Broker to be associated with the enrollment transaction | String | |
| | Agent/ Broker Last Name | R | Last name of the Agent/ Broker to be associated with the enrollment transaction | String | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Request | | | | | | | |
|--|---------------------------|--|---|-----------|------------|------------|--|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length | |
| | Agent/ Broker Name Suffix | O | Name suffix of the Agent/ Broker to be associated with the enrollment transaction | String | NotResp | | |
| APTC Attestation (Will repeat for person on the application besides the application contact and the applicants whose name needs to be provided to the partner for gathering APTC attestation). | | | | | | | |
| Attestation Information | | | | | | | |
| | First Name | R | First name of the other person | String | | NotResp | |
| | Middle Name | O | Middle name of the other person | String | | | |
| | Last Name | R | Last name of the other person | String | | | |
| | Suffix Name | O | Suffix of the other person • Jr. • Sr. • II • III • IV | String | | | |
| | APTC Attestation | C | Applicable for initial enrollment and enrollment changes where there is an APTC Applied Amount on any of the enrollment group/policy. At least one attestation is required if any applicant APTC eligible as of the Action Effective Date. | Boolean | | | |
| Enrollment Group/Policy Information Information identifying an enrollment group/policy and the actions to be performed on the enrollment group/policy. This group will repeat for each enrollment group/policy on which one or more actions need to be performed. | | | | | | | |
| Enrollment Group /Policy Identification | | | | | | | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Request | | | | | |
|---|----------------------------|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | FFE Assigned Policy Number | C | Unique ID assigned by the FFM for the policy covering the enrollment group. Required for all enrollment transactions except initial enrollments. Optional on initial enrollments. | String | NotResp |
| | Issuer Policy Number | C | Unique ID assigned by the Issuer for the policy covering the enrollment group. Will be required for all transactions except initial enrollments. Optional for initial enrollments. | String | |
| | Start Date | R | Effective date on which coverage will commence under the policy. | Date | |
| | End Date | C | Effective date on which coverage under the existing policy will end. Required for disenrollment and cancellation. Not applicable for new enrollments or enrollment changes. | Date | |
| | Issuer ID | R | Issuer ID for the Policy. | String | |
| | Assigned Plan ID | R | Assigned QHP ID for the policy. | String | |
| Transaction Type | | | | | |
| | Transaction Type | R | <ul style="list-style-type: none"> E - Enrollment (Initial Enrollment/ New Policy) C - Change (Add/Remove a member, change in Premium, APTC/CSR) D - Disenrollment (Terminating a Policy) X - Cancellation (Cancelling a policy before it becomes effective) | String | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Request | | | | | |
|--|---------------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| Member Actions (For each applicant seeking health coverage within the enrollment group/policy) Information on a member of the enrollment group/policy for whom one or more actions need to be performed. This set of data elements will be repeated for each member in the enrollment group/policy with an action necessary. In case of a new enrollment group , all members of the enrollment group will be included. | | | | | |
| <i>Member Identifier</i> | | | | | |
| | FFE Assigned Applicant ID | R | Unique identifier for the applicant within the household returned by the FFM. | Integer | |
| | Issuer Assigned Member ID | C | Unique ID assigned by the Issuer of the policy for the member. Required all transactions except initial enrollments. Optional on initial enrollments. | String | NotResp |
| | FFE Assigned Member ID | C | Unique ID assigned to each member enrolled with an Issuer. This ID is unique for an individual within the context of an Issuer. Will be required all transactions except initial enrollments. Optional on initial enrollments (would only be applicable on initial enrollments if the member is enrolling in a QHP with the same Issuer). | String | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Request | | | | | |
|---|----------------------------|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Subscriber Indicator | C | Indicator for whether the applicant is the subscriber. Y - Yes N - No Only one Applicant per enrollment group within the request can be the subscriber (Y). All other applicants in the enrollment group will need to have N. For initial enrollments one applicant within the enrollment is required to be the Subscriber. Subscriber indicator is not applicable on other transaction types. | Boolean | |
| | Relationship to Subscriber | R | Code indicating the relationship of this member to the subscriber. See Appendix A.1 Relationship Codes for list of valid values. | String | |
| | Tobacco Use Indicator | C | Indicator to whether the member currently uses Tobacco products or has used Tobacco products in the past. N - Not a Tobacco user Y - Yes, a Tobacco user Required on initial enrollment for all applicants in the enrollment group. Also required for new members to an existing enrollment group on an enrollment change. | String | |
| | Last date of Tobacco Use | C | Last date on which the applicant used tobacco products. Required when "Tobacco Use Indicator" is "Y". | Date | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Request | | | | | |
|---|------------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Enrollment Period Type | C | Enrollment period to be used for the applicant in case of addition to the enrollment group. I - Initial Enrollment Period A - Annual Enrollment Period S - Special Enrollment Period | String | NotResp |
| | Type Code | R | Required on initial enrollment for all applicants in the enrollment group. Also required for new members to an existing enrollment group on an enrollment change. | String | |
| | Reason Code | R | Maintenance type of action corresponding to the action being performed on the member. See Maintenance Type Codes (Member Level) for a list of valid values. | String | |
| | Action Effective Date | R | Maintenance reason code corresponding to the action being performed on the member. See Appendix A.4 Maintenance Reason Codes for a list of valid values | Date | |
| <i>Premium Information</i> | | | Effective Date for the action. yyyy-mm-dd | | |
| | Rating Area | R | Identifies a specific geographic rating area as defined by a State | Integer | |
| | Total Premium Amount | R | Total premium amount for the enrollment group/policy. | Amount | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (W.S.W.B.FFE.02) - Request | | | | | |
|---|--|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | APTC Elected % | C | Percent of the maximum APTC elected by the consumer to apply towards premium costs. Required if any member of the enrollment group/policy is APTC eligible as of the Action Effective Date. | Double | |
| | APTC Applied Amount | C | Total amount of APTC applied to the enrollment group/policy. Required if any member of the enrollment group/policy is APTC eligible as of the Action Effective Date. | Amount | |
| | Total Individual Responsibility Amount | R | Net premium amount (after applying the APTC amount applied) that will be paid by the consumer for the enrollment group/policy. | Amount | |
| | CSR Level Applicable | R | Cost Sharing Reduction Level applicable to the enrollment group/policy. Please note that if members of the enrollment group/policy are eligible for different CSR levels, the least beneficial CSR Level will be applied to the enrollment group/policy. | String | NotResp |

7.3.2.4. Submit Enrollment/Change/Disenrollment Transaction (W.S.W.B.FFE.02) - Response

Table 11 provides the data elements for FFM's response to a partner's enrollment submission request.

Table 11 - Submit Enrollment/Change/Disenrollment Transaction - Response

| Submit Enrollment/Change/Disenrollment Transaction (W.S.WB.FFE.02) - Response | | | | | | |
|--|--------------------------------|--|--|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| Partner/ Consumer Identification | | | | | | |
| | Information Exchange System ID | R | Unique Identifier assigned to the Partner Website by the Federal Data Services Hub as part of the onboarding process for the partner | String | NotResp | |
| | State Exchange Code | R | Code indicating the specific state instance of the FFM on which eligibility was determined. 2 Character State Abbreviation followed by a digit. The last position will always be '0'. | String | | |
| | Partner Assigned Consumer ID | R | Unique Identifier assigned by Partner Website for the consumer for interacting with the FFM. | String | | |
| | FFE Assigned Consumer ID | R | Unique Identifier assigned by the FFM for the consumer's eligibility determination interaction. | String | | |
| Enrollment Group/Policy Information | | | | | | |
| Information identifying an enrollment group/ policy (the enrollment group would be issued as a policy upon acceptance of the enrollment group by the FFM) and the actions performed on the enrollment group/policy. This group will repeat for each enrollment group/policy on which one or more actions were performed. | | | | | | |
| Enrollment Group/Policy Identification | | | | | | |
| | FFE Assigned Policy Number | R | Unique ID assigned by the FFM for the policy covering the enrollment group. | String | NotResp | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FEE.02) - Response | | | | | |
|--|----------------------|--|--|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Issuer Policy Number | C | Unique ID assigned by the Issuer for the policy covering the enrollment group. Optional for initial enrollment transactions, required for all other enrollment transaction types. Note: Pending clarification: If Issuer Policy Number is not allowed on the 834 initial enrollment transaction, it will not be accepted by the direct enrollment service for initial enrollments. | String | NotResp |
| | Start Date | R | Effective date on which coverage will commence under the policy. | Date | |
| | End Date | O | Effective date on which coverage under the policy will end. | Date | |
| | Issuer ID | R | Issuer ID for the Policy. | String | |
| | Plan ID | R | Assigned QHP ID for the policy. | String | |
| <i>Transaction Information</i> | | | | | |
| | Transaction Type | R | <ul style="list-style-type: none"> E - Enrollment (Initial Enrollment/ New Policy) C - Change (Add/Remove a member, change in Premium, APTC/CSR) D - Disenrollment (Terminating a Policy) X - Cancellation (Cancelling a policy before it becomes effective) | String | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FEE.02) - Response | | | | | |
|--|---------------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Transaction Response Code | R | Code indicating acceptance of the transaction or reason for the failure of the transaction (if applicable) <ul style="list-style-type: none"> Transaction accepted as submitted User not permitted to perform enrollment transactions for the consumer's applicants Subscriber not specified More than one subscriber in an enrollment group Invalid Issuer ID Invalid Plan ID Invalid Issuer/Plan combination Invalid Member Information Incorrect Premium Amount Incorrect APTC Amount Elected APTC Exceeds EHB Portion of QHP Premium Invalid CSR Level for enrollment group/policy Incorrect CSR Level for enrollment group/policy | String | NotResp |
| | Payment Transaction ID | C | Unique Identifier returned by the FFM to the partner website on successful submission of the enrollment for enrollment into a QHP that accepts online payment. The payment transaction ID should be submitted by the partner to the Issuer if payment is made online so that the Issuer can correlate the online payment submission with the x12-834 enrollment transaction sent by the FFM. | String | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (W.S.WB.FFE.02) - Response | | | | | |
|---|----------------------|--|--|-----------|-----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length Max Length |
| <i>Corrected Premium Information</i> | | | Premium and CSR Information as calculated by the FFM. If there are discrepancies between these calculations and those sent by the Issuer, the transaction will be rejected for the Issuer to resubmit with corrected information. A Partner website has the choice of collecting payment information from the consumer before or after making the Enrollment web service request. However, they should not process the payment till the enrollment transaction has been successfully accepted by the FFM. | | |
| | Rating Area | C | Identifies a specific geographic rating area as defined by a State. Required when FFM when FFM data validation of the partner enrollment submission determined a correction is needed for this data element. | Integer | NotResp |
| | Total Premium Amount | C | Total premium amount for the enrollment group. Required when FFM when FFM data validation of the partner enrollment submission determined a correction is needed for this data element. | Amount | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Response | | | | | |
|--|--|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | APTC Applied Amount | C | Total amount of APTC elected by the consumer for the policy. Required when FFM when FFM data validation of the partner enrollment submission determined a correction is needed for this data element. | Amount | |
| | Total Individual Responsibility Amount | C | Net premium amount (after applying the APTC amount elected) that will be paid by the consumer. Required when FFM when FFM data validation of the partner enrollment submission determined a correction is needed for this data element. | Amount | |
| | Applicable CSR Level | C | <ul style="list-style-type: none"> • 01 - Exchange variant (no CSR) • 02 - Open to Members of Federally Recognized Tribes below 300%FPL • 03 - Open to Members of Federally Recognized Tribes above 300%FPL • 04 - 73% AV Level Silver Plan CSR • 05 - 87% AV Level Silver Plan CSR • 06 - 94% AV Level Silver Plan CSR <p>Required when FFM when FFM data validation of the partner enrollment submission determined a correction is needed for this data element.</p> | String | <div>NotResp</div> |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FFE.02) - Response | | | | | | |
|---|---------------------------|--|---|-----------|------------|------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min Length | Max Length |
| Member Actions (For each applicant seeking health coverage within the enrollment group/policy) Information on a member of the enrollment group for whom one or more actions were performed. This group will be repeated for each member in the enrollment group with an action. | | | | | | |
| <i>Member Identification</i> | | | | | | |
| | FFE Assigned Applicant ID | R | Unique identifier for the applicant within the household returned by the FFM. | Integer | | |
| | Issuer Assigned Member ID | C | Required on all transactions except initial enrollment, optional otherwise. | String | | |
| | FFE Assigned Member ID | C | Required on all transactions except initial enrollment, optional otherwise. | String | | |
| <i>Action Details</i> | | | | | | |
| | Type Code | R | Maintenance type of action corresponding to the action being performed on the member. See Appendix A.3 Maintenance Type Codes (Member Level) for a list of valid codes. | String | NotResp | |
| | Reason Code | R | Maintenance reason code corresponding to the action being performed on the member. See Appendix A.4 Maintenance Reason Codes for a list of valid codes | String | | |
| | Action Effective Date | R | Effective Date for the action. yyyy-mm-dd | Date | | |
| | | | | | | |

Federally Facilitated Marketplace (FFM)

| Submit Enrollment/Change/Disenrollment Transaction (WS.WB.FEE.02) - Response | | | | | |
|--|----------------------|--|---|-----------|----------------------|
| Data Element Group | Data Element | Required(R), Optional(O), Conditional(C) | Description | Data Type | Min LengthMax Length |
| | Action Response Code | R | <ul style="list-style-type: none">No ErrorMember not on ApplicationNo Available Enrollment PeriodInvalid Enrollment PeriodInvalid Effective date for Enrollment PeriodInvalid RelationshipInvalid Maintenance Reason CodeInvalid Tobacco Use Indicator | String | NotResp |

Appendix A. Code Values/ Descriptions

A.1 Relationship Codes

Table 12 provides a list of relationship codes, code values, and descriptions.

Table 12 - Relationship Codes

| Code | Description |
|---------|---------------------------------|
| NotResp | Spouse |
| | Father or Mother |
| | Grandfather or Grandmother |
| | Grandson or Granddaughter |
| | Uncle or Aunt |
| | Nephew or Niece |
| | Cousin |
| | Adopted Child |
| | Foster Child |
| | Son-in-law or Daughter-in-law |
| | Brother-in-law or Sister-in-law |
| | Mother-in-law or Father-in-law |
| | Brother or Sister |
| | Ward |
| | Stepparent |
| | Stepson or Stepdaughter |
| | Self |
| | Child |
| | Sponsored Dependent |
| | Dependent of a Minor Dependent |
| | Ex-spouse |
| | Guardian |
| | Court Appointed Guardian |
| | Collateral Dependent |
| | Life Partner |
| | Annultant |
| | Trustee |
| | Other Relationship |
| | Other Relative |

A.2 SEP Reason Code

Table 13 provides a list of SEP reason codes and descriptions.

Federally Facilitated Marketplace (FFM)

Table 13 - SEP Reason Codes

| Code Values |
|--|
| Termination of Benefits |
| Marriage |
| Birth |
| Adoption |
| Newly Eligible |
| Exchange Error |
| Dissatisfied with medical care/services rendered |
| Financial Change |
| Change of Location |
| Exceptional Circumstance |

Federally Facilitated Marketplace (FFM)

A.3 Maintenance Type Codes (Member Level)

Table 14 provides a list of member level maintenance type codes and descriptions.

Table 14 - Member Level Maintenance Type Codes

| Code | | Description |
|----------------|--|---|
| NotResp | | Change |
| | | Addition |
| | | Cancellation or Termination |
| | | Reinstatement |
| | | Cancel Pending Auto Disenrollment due to loss of APTC/CSR |

Federally Facilitated Marketplace (FFM)

A.4 Maintenance Reason Codes

Table 15 provides a list of maintenance reason codes and descriptions.

Table 15 - Maintenance Reason Codes

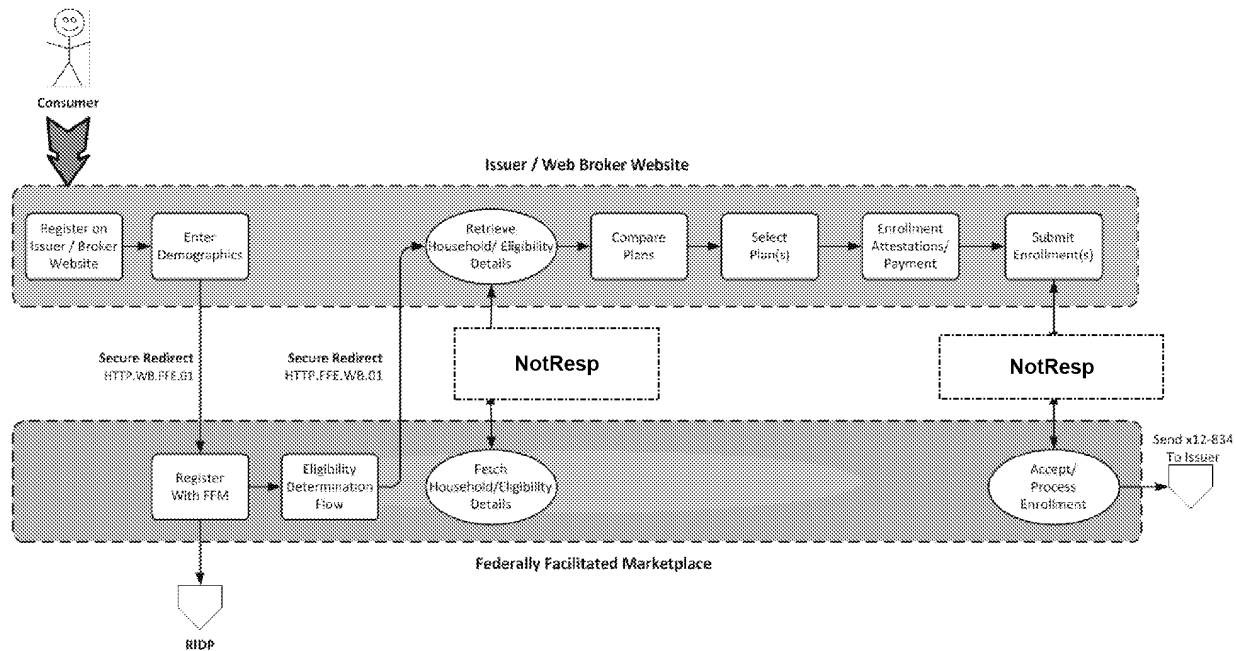
| Code | Description |
|----------------|--|
| NotResp | Divorce |
| | Birth |
| | Death |
| | Adoption |
| | Strike |
| | Termination of Benefits |
| | Consolidation Omnibus Budget Reconciliation Act (COBRA) |
| | Consolidation Omnibus Budget Reconciliation Act (COBRA) Premium Paid |
| | Voluntary Withdrawal |
| | Plan Change |
| | Change in Identifying Data Elements |
| | Initial Enrollment |
| | Benefit Selection |
| | Re-enrollment |
| | Change of Location |
| | Non Payment |
| | No Reason Given |
| | Member Benefit Selection |

Appendix B. Key Interaction Scenarios

B.1 Scenario #1a - New FFM Consumer (Consumer initiated direct enrollment)

Figure 3 - New FFM Consumer illustrates the consumer workflow between the partner website and the FFM.

Figure 3 - New FFM Consumer



B.1.1 Scenario Overview

This scenario applies to a new consumer shopping for health insurance on a partner website. As part of the shopping experience, if the consumer decides to shop for a QHP for their health coverage, the partner website will transfer the consumer to the FFM website for determination of eligibility for QHP, with or without financial assistance. After completion of eligibility determination by the FFM, the consumer will be transferred back to the partner website to complete their plan shopping, ultimately resulting in an enrollment under a QHP. The partner website will use its own tools to guide the consumer through QHP shopping and enrollment. The partner website will present the consumer various views of QHPs matching their needs, including information on benefits covered and premium costs. The QHP information presented will reflect Cost Sharing Reductions (CSR) and Advance Premium Tax Credit (APTC) the consumer is eligible for. When the consumer is ready to enroll into a QHP, the partner website will capture enrollment attestations, including those for APTC, and submit an enrollment transaction to the FFM by invoking a web service on the FFM. The partner website may collect payment for the initial premium either prior to submission of the enrollment transaction or after successful submission. The FFM will process the enrollment transaction and generate an x12-834 transaction to notify the Issuer.

Federally Facilitated Marketplace (FFM)

B.1.2 Sequence of Activities

On Partner Website

- 1) Consumer starts their shopping for Health Insurance Coverage
- 2) If consumer already has an account with the partner website they would login using their credentials for the partner website. Otherwise, consumer may create an Account on the partner website. Note: Depending on the partner website, the account creation step may be performed upfront or after the consumer is transferred back to the partner website after eligibility determination by FFM.
- 3) Consumer indicates intent to enroll in a QHP, with or without financial assistance for their Health Insurance Coverage
- 4) Partner website will generate a unique ID for the Consumer referred to as Partner Assigned Consumer ID.
- 5) Partner website will transfer the consumer to the FFM website for submitting the eligibility application. Information passed to the FFM would include:
 - a. Information Exchange System ID - A Unique Identifier assigned to the partner website as part of their onboarding by the Federal Data Services Hub.
 - b. Partner Assigned Consumer ID.
 - c. Consumer's Contact Information (Optional). If sent, this information will be used to prefill the FFM registration page. This is applicable only to new FFM consumers. The information will be discarded by the FFM for returning consumers.
 - d. Return URL - partner website URL to which the consumer will be transferred by FFM on completion of eligibility determination or on consumer's intent to return
 - e. Keep-alive URL - partner website URL that the FFM website will ping periodically to keep the partner website session of the consumer active. This is optional and the ping will be performed only if the Keep-alive URL is sent to the FFM as part of the transfer.

On FFM

- 6) Consumer does not already have an account with the FFM.
- 7) Consumer will create an account on the FFM. The account creation process on the FFM would involve the standard CMS Enterprise Identity Management (EIDM) workflow including Remote Identity Proofing (RIDP)
- 8) FFM will associate the Consumer's FFM account with the partner website
 - Note 1: A consumer's FFM account may be associated with multiple Partner Websites if they visit the FFM through those websites.
 - Note 2: Each partner website will provide the FFM its own Partner Assigned Consumer ID
 - Note 3: The FFM will generate a separate FFE Assigned Consumer ID for each partner website
 - Note 4: The consumer may disassociate their account from a partner website through the My Account functionality of the FFM
 - Note 5: Consumer may choose to return to the FFM directly and perform their entire shopping on the FFM, including enrollment

Federally Facilitated Marketplace (FFM)

- 9) Consumer fills out an application for QHP enrollment with or without a request for financial assistance. The following information will be collected
 - a. Household information - List of household members (Applicants and Non-Applicants) with demographic information
 - b. The following information will be collected only if the consumer requested financial assistance
 - i. Tax filing status and tax household information
 - ii. Other demographic information required for Medicaid/CHIP eligibility
 - iii. Income information
 - iv. Information on other health coverage
- 10) FFM will generate the FFE Assigned Consumer ID for the consumer
- 11) FFM will verify information entered by consumer with internal and external data sources
- 12) FFM will determine eligibility for QHP for each member of the household seeking health insurance coverage
- 13) If consumer requested financial assistance, FFM will determine eligibility for Medicaid, CHIP and APTC/CSR
 - a. For each applicant eligible for Medicaid or CHIP
 - i. FFM will perform an account transfer for the applicant to the State Medicaid/CHIP agency
 - b. For applicants not eligible for Medicaid/CHIP, but eligible for APTC and/or CSR
 - i. FFM will calculate Maximum APTC and CSR level
- 14) FFM will transfer the consumer to the Return URL provided by the partner website. The Partner Assigned Consumer ID and FFE Assigned Consumer ID will be sent to the partner website as part of the transfer.

On Partner Website

- 15) Partner website will invoke the FFM Household/Eligibility web service using the FFE Assigned Consumer ID
- 16) FFM Household/Eligibility Service will return the following information:
 - a. Application Contact Information
 - b. List of members and demographic Information required for plan shopping and enrollment. This will only include members requesting health insurance coverage (including those referred to Medicaid/CHIP)
 - c. Eligibility information for each member of the household
 - i. Eligibility for Medicaid/CHIP
 - ii. Eligibility for APTC including Maximum Monthly APTC
 - iii. Eligibility for CSR and CSR Level
 - iv. Eligibility for Enrollment Period - Initial Enrollment Period (IEP), Annual Enrollment Period (AEP) or Special Enrollment Period (SEP).
 - d. Enrollment status of members of the household (applicable if a member is enrolled through a different application on the FFM).
- 17) The following steps will be performed only if the consumer has submitted their eligibility application on the FFM and determination of eligibility has been completed.
- 18) For members transferred by FFM to Medicaid/CHIP, partner website will notify consumer and stop processing.

Federally Facilitated Marketplace (FFM)

- 19) For members not eligible for Medicaid/CHIP or QHP, partner website will notify consumer and may guide them through their commercial plan shopping experience (non-QHPs). There will be no further interaction with the FFM for those applicants.
- 20) The remaining steps on the partner website apply only if one or more members are eligible for QHP, with or without eligibility for APTC and/or CSR and also eligible for an enrollment period (IEP, AEP or SEP).
 - Note: Based on eligibility for an enrollment period of a household member, other members enrolled in a QHP with that member may also be eligible to change plans.
- 21) Consumer goes through shopping experience for QHPs
 - a. Partner website will allow consumer to form enrollment Groups within the household including one or more members in each enrollment group. Multiple enrollment groups would allow members of the household to enroll in different QHPs more suitable to their respective needs. Multiple enrollment groups will also be necessary in situations where a QHP would not accept all members in a single enrollment group (policy) based on residency or their relationship to the subscriber.
 - b. Consumer may specify criteria including Plan Metal level, and premium cost to search and compare plans
- 22) At the end of the QHP shopping experience, the consumer will select a QHP for each of the enrollment groups
- 23) Consumer will complete attestations required for enrollment including those for APTC and CSR
- 24) Consumer submits the enrollment request
- 25) Partner website will invoke a FFM Enrollment web service to submit the enrollment request. FFM will validate and process the enrollment transaction. If the transaction fails validation checks, FFM will return an exception. Otherwise, FFM will return an enrollment transaction ID.
- 26) For successful enrollment transactions, partner website may collect payment information for the initial premium.
- 27) Partner website may guide consumer through other product shopping options

On FFM (No consumer interaction)

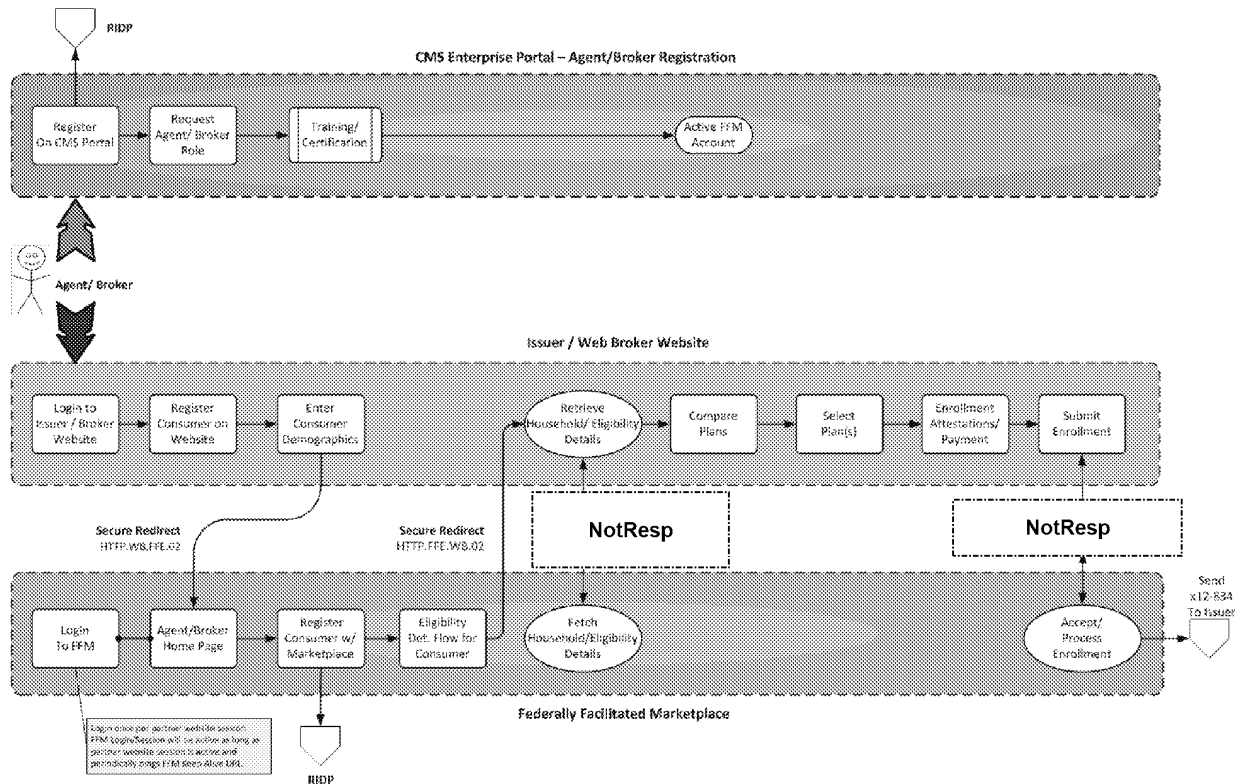
- 28) FFM will complete processing of the QHP enrollment transaction(s)
- 29) For each enrollment group, FFM will generate an x12-834 transaction for initial enrollment and transmit to the Issuer of the QHP
 - Note 1: The Agent/Broker information sent by the partner website as part of the enrollment transaction will be listed as the agent/broker on the x12-834 transaction for compensation purposes
 - Note 2: If a consumer returns to the FFM directly and performs their enrollment on the FFM, none of the partner websites through which they had previously visited the FFM will be included on the x12-834 transaction

Federally Facilitated Marketplace (FFM)

B.2 Scenario #1b - New FFM Consumer (Agent/Broker Initiated Direct Enrollment)

Figure 3 - New FFM Consumer illustrates the agent/broker assisted workflow between the partner website and the FFM.

Figure 4 - New FFM Consumer (Agent/Broker Initiated Direct Enrollment)



B.2.1 Scenario Overview

This scenario applies to a new consumer shopping for health insurance on a partner website via an agent/broker. Prior to being able to assist consumer, agents/brokers would have to completed registration with the FFM, depicted above in the “CMS Enterprise Portal – Agent/Broker Registration” section. Outside of the FFM, agents/brokers would also need to establish access to partner website tools as agent/brokers. See Section 3.2.2.1 Registration for more details on agent/broker prerequisites for assisting FFM consumers.

As part of the agent/broker assisted shopping experience, if the consumer decides to shop for a QHP for their health coverage, the partner website will transfer the agent/broker to the FFM website for determination of eligibility for QHP for the consumer, with or without financial assistance. After completion of eligibility determination by the FFM, the agent/broker will be transferred back to the partner website to complete the consumer’s plan shopping, ultimately resulting in an enrollment under a QHP. The partner website will use its own tools to guide the agent/broker through QHP shopping and enrollment. The agent/broker, using the partner website, will present the consumer various views of QHPs matching their needs, including information on benefits covered and premium costs. The QHP information presented will reflect Cost Sharing Reductions (CSR) and Advance Premium Tax Credit (APTC) the consumer is eligible for. When

Federally Facilitated Marketplace (FFM)

the consumer is ready to enroll into a QHP, the agent/broker will use the partner website to capture enrollment attestations, including those for APTC, and submit an enrollment transaction to the FFM by invoking a web service on the FFM. The agent/broker may use the partner website to collect payment for the initial premium either prior to submission of the enrollment transaction or after successful submission, according to the partner's procedures. The FFM will process the enrollment transaction and generate an x12-834 transaction to notify the Issuer.

B.2.2 Sequence of Activities

On Partner Website

- 1) Agent/Broker starts the shopping for Health Insurance Coverage for a consumer on the partner website.
- 2) Consumer indicates intent to enroll in a QHP, with or without financial assistance for their Health Insurance Coverage
- 3) Partner website will generate a unique ID for the Consumer referred to as Partner Assigned Consumer ID.
- 4) Partner website will transfer the agent/broker to the FFM website for submitting the consumer's eligibility application. Information passed to the FFM would include:
 - a. Information Exchange System ID - A Unique Identifier assigned to the partner website as part of their onboarding by the Federal Data Services Hub.
 - b. FFM User ID - The agent/broker's user ID assigned by the FFM.
 - c. Partner Assigned Consumer ID.
 - d. Consumer's Contact Information (Optional). If sent, this information will be used to prefill the FFM registration page. This is applicable only to new FFM consumers. The information will be discarded by the FFM for returning consumers.
 - e. Return URL - partner website URL to which the agent/broker will be transferred by FFM on completion of eligibility determination or on agent/broker's intent to return.
 - f. Keep-alive URL - partner website URL that the FFM website will ping periodically to keep the partner website session of the agent/broker active. This is optional and the ping will be performed only if the Keep-alive URL is sent to the FFM as part of the transfer.

On FFM

- 5) Consumer does not already have an account with the FFM.
- 6) Agent/broker will create an account on the FFM for the consumer as the first step in the application process which would involve a portion of the standard CMS Enterprise Identity Management (EIDM) workflow for NotResp Note: the account creation performed by the agent/broker will exclude creation of an online User ID and password for the consumer which the consumer would need to perform themselves on the FFM directly.
- 7) FFM will associate the Consumer's FFM account with the partner website
 - Note 1: A consumer's FFM account may be associated with multiple Partner Websites if they visit the FFM through those websites.
 - Note 2: Each partner website will provide the FFM its own Partner Assigned Consumer ID

Federally Facilitated Marketplace (FFM)

- Note 3: The FFM will generate a separate FFE Assigned Consumer ID for each partner website
 - Note 4: The consumer may disassociate their account from a partner website through the My Account functionality of the FFM
 - Note 5: Consumer may choose to return to the FFM directly and perform their entire shopping on the FFM, including enrollment. If the consumer were to choose to do so, the consumer would need to register themselves with the FFM for the purposes of establishing a User ID and password via the standard CMS EIDM workflow including NotResp Once the consumer established their direct online access to the FFM, the consumer would be able to see the information they had submitted to the FFM via the agent/broker.
- 8) Working with the consumer, the agent/broker completes an application for QHP enrollment with or without a request for financial assistance. The following information will be collected
 - a. Household information - List of household members (Applicants and Non-Applicants) with demographic information
 - b. The following information will be collected only if the consumer requested financial assistance
 - i. Tax filing status and tax household information
 - ii. Other demographic information required for Medicaid/CHIP eligibility
 - iii. Income information
 - iv. Information on other health coverage
 - 9) FFM will generate the FFE Assigned Consumer ID for the consumer
 - 10) FFM will verify information entered by consumer with internal and external data sources
 - 11) FFM will determine eligibility for QHP for each member of the household seeking health insurance coverage
 - 12) If consumer requested financial assistance, FFM will determine eligibility for Medicaid, CHIP and APTC/CSR
 - a. For each applicant eligible for Medicaid or CHIP
 - i. FFM will perform an account transfer for the applicant to the State Medicaid/CHIP agency
 - b. For applicants not eligible for Medicaid/CHIP, but eligible for APTC and/or CSR
 - i. FFM will calculate Maximum APTC and CSR level
 - 13) FFM will transfer the agent/broker to the Return URL provided by the partner website. The Partner Assigned Consumer ID and FFE Assigned Consumer ID will be sent to the partner website as part of the transfer.

On Partner Website

- 14) Partner website will invoke the FFM Household/Eligibility web service using the FFE Assigned Consumer ID
- 15) FFM Household/Eligibility Service will return the following information:
 - a. Application Contact Information
 - b. List of members and demographic Information required for plan shopping and enrollment. This will only include members requesting health insurance coverage (including those referred to Medicaid/CHIP)
 - c. Eligibility information for each member of the household

Federally Facilitated Marketplace (FFM)

- i. Eligibility for Medicaid/CHIP
 - ii. Eligibility for APTC including Maximum Monthly APTC
 - iii. Eligibility for CSR and CSR Level
 - iv. Eligibility for Enrollment Period - Initial Enrollment Period (IEP), Annual Enrollment Period (AEP) or Special Enrollment Period (SEP).
- d. Enrollment status of members of the household (applicable if a member is enrolled through a different application on the FFM).
- 16) The following steps will be performed only if the consumer eligibility application has been submitted on the FFM and determination of eligibility has been completed.
- 17) For members transferred by FFM to Medicaid/CHIP, partner website will notify consumer and stop processing.
- 18) For members not eligible for Medicaid/CHIP or QHP, partner website will notify consumer and may guide them through their commercial plan shopping experience (non-QHPs). There will be no further interaction with the FFM for those applicants.
- 19) The remaining steps on the partner website apply only if one or more members are eligible for QHP, with or without eligibility for APTC and/or CSR and also eligible for an enrollment period (IEP, AEP or SEP).
 - Note: Based on eligibility for an enrollment period of a household member, other members enrolled in a QHP with that member may also be eligible to change plans.
- 20) Agent/broker assists the consumer goes through shopping experience for QHPs
 - a. Partner website will allow forming enrollment groups within the household including one or more members in each enrollment group. Multiple enrollment groups would allow members of the household to enroll in different QHPs more suitable to their respective needs. Multiple enrollment groups will also be necessary in situations where a QHP would not accept all members in a single enrollment group (policy) based on residency or their relationship to the subscriber.
 - b. Working with the agent/broker, the Consumer may specify criteria including Plan Metal level, and premium cost to search and compare plans
- 21) At the end of the QHP shopping experience, the agent/broker will gather the consumer selections of a QHP for each of the enrollment groups
- 22) Agent/broker gathers from the consumer the attestations required for enrollment including those for APTC and CSR
- 23) Agent/broker submits the enrollment request
- 24) Partner website will invoke a FFM Enrollment web service to submit the enrollment request. FFM will validate and process the enrollment transaction. If the transaction fails validation checks, FFM will return an exception. Otherwise, FFM will return an enrollment transaction ID.
- 25) For successful enrollment transactions, partner website may collect payment information for the initial premium.
- 26) Partner website may guide consumer through other product shopping options

On FFM (No consumer interaction)

Federally Facilitated Marketplace (FFM)

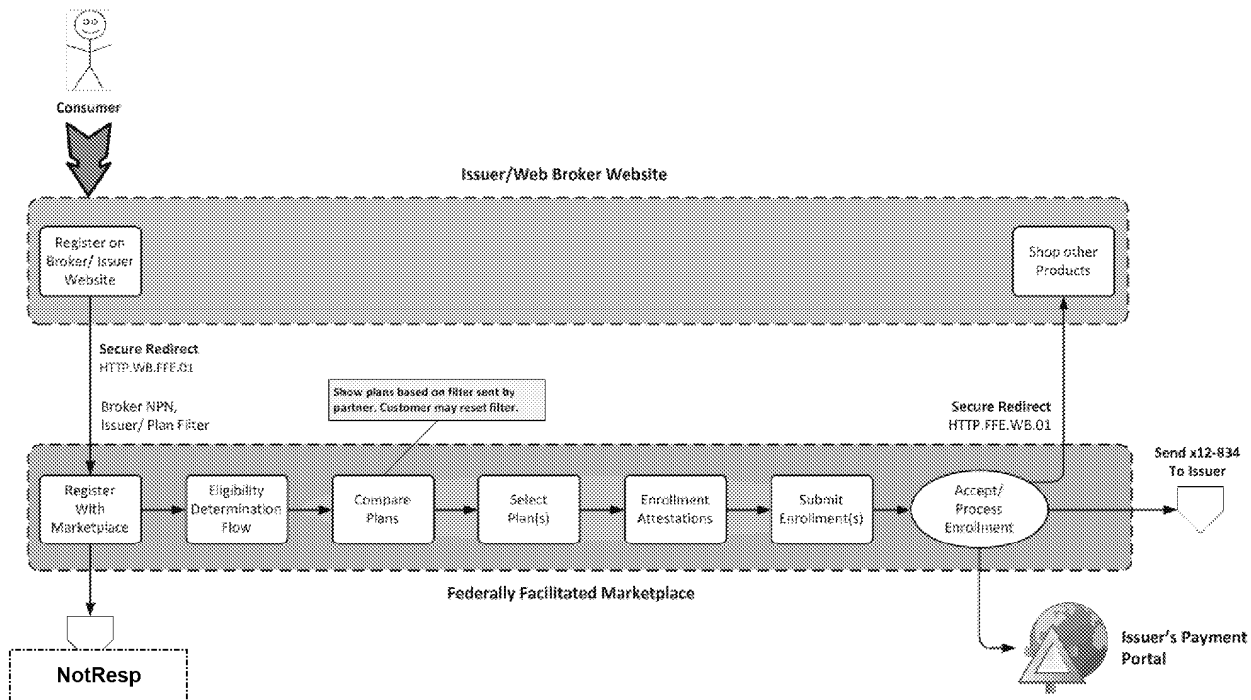
- 27) FFM will complete processing of the QHP enrollment transaction(s)
- 28) For each enrollment group, FFM will generate an x12-834 transaction for initial enrollment and transmit to the Issuer of the QHP
 - Note 1: The Agent/Broker information sent by the partner website as part of the enrollment transaction will be listed as the agent/broker on the x12-834 transaction for compensation purposes
 - Note 2: If a consumer returns to the FFM directly and performs their enrollment on the FFM, none of the partner websites through which they had previously visited the FFM will be included on the x12-834 transaction

Federally Facilitated Marketplace (FFM)

B.3 Scenario #1c - New FFM Consumer (Consumer initiated lead generation)

Figure 3 - New FFM Consumer illustrates the consumer workflow between the partner website and the FFM in the lead generation model.

Figure 5 - New FFM Consumer (Lead Generation)



B.3.1 Scenario Overview

This scenario applies to consumers shopping for health insurance on a partner website. As part of the shopping experience, if the consumer decides to shop for a QHP for their health coverage, the partner website will transfer the consumer to the FFM website for determination of eligibility for QHP, with or without financial assistance. If the partner website is choosing to do lead generation rather than direct enrollment, after completion of eligibility determination by the FFM, the consumer will not be transferred back to the partner website to complete their plan shopping. The FFM rather than the partner website will guide the consumer through QHP shopping and enrollment including capturing enrollment attestations, and generating an x12-834 transaction to notify the Issuer. If the partner website supplied a filter for the Issuers/plans to display, FFM will default the plan results to be filtered accordingly, but the consumer will have the choice to remove the filter. If the partner website supplied a return URL as part of the lead generation, the FFM will transfer the consumer back to the partner website after enrollment submission.

B.3.2 Sequence of Activities

On Partner Website

- 1) Consumer starts their shopping for Health Insurance Coverage
- 2) If consumer already has an account with the partner website they would login using their credentials for the partner website. Otherwise, consumer

Federally Facilitated Marketplace (FFM)

may create an Account on the partner website. Note: Depending on the partner website, the account creation step may be performed upfront or after the consumer is transferred back to the partner website after enrollment by FFM.

- 3) Consumer indicates intent to enroll in a QHP, with or without financial assistance for their Health Insurance Coverage
- 4) Partner website will generate a unique ID for the Consumer referred to as Partner Assigned Consumer ID.
- 5) Partner website will transfer the consumer to the FFM website for submitting the eligibility application and enrollment. Information passed to the FFM would include:
 - a. Information Exchange System ID - A Unique Identifier assigned to the partner website as part of their onboarding by the Federal Data Services Hub.
 - b. Partner Assigned Consumer ID.
 - c. Consumer's Contact Information (Optional). If sent, this information will be used to prefill the FFM registration page. This is applicable only to new FFM consumers. The information will be discarded by the FFM for returning consumers.
 - d. Return URL - partner website URL to which the consumer will be transferred by FFM on completion of eligibility determination or on consumer's intent to return
 - e. Keep-alive URL - partner website URL that the FFM website will ping periodically to keep the partner website session of the consumer active. This is optional and the ping will be performed only if the Keep-alive URL is sent to the FFM as part of the transfer.
 - f. NPN – The national producer number to be submitted with the resulting enrollment(s) where the consumer selected to enroll in plan that meets the Plan Results Filter criteria.
 - g. Plan Results Filter – The default filter of up to ten Issuer IDs or QHP IDs to filter the plan results in FFM for the consumer.

On FFM

- 6) Consumer does not already have an account with the FFM.
- 7) Consumer will create an account on the FFM. The account creation process on the FFM would involve the standard CMS Enterprise Identity Management (EIDM) workflow including Remote Identity Proofing (RIDP)
- 8) FFM will associate the Consumer's FFM account with the partner website
 - Note 1: A consumer's FFM account may be associated with multiple Partner Websites if they visit the FFM through those websites.
 - Note 2: Each partner website will provide the FFM its own Partner Assigned Consumer ID
 - Note 3: The FFM will generate a separate FFE Assigned Consumer ID for each partner website
 - Note 4: The consumer may disassociate their account from a partner website through the My Account functionality of the FFM
 - Note 5: Consumer may choose to return to the FFM directly and perform their entire shopping on the FFM, including enrollment

Federally Facilitated Marketplace (FFM)

- 9) Consumer fills out an application for QHP enrollment with or without a request for financial assistance. The following information will be collected
 - a. Household information - List of household members (Applicants and Non-Applicants) with demographic information
 - b. The following information will be collected only if the consumer requested financial assistance
 - i. Tax filing status and tax household information
 - ii. Other demographic information required for Medicaid/CHIP eligibility
 - iii. Income information
 - iv. Information on other health coverage
- 10) FFM will generate the FFE Assigned Consumer ID for the consumer
- 11) FFM will verify information entered by consumer with internal and external data sources
- 12) FFM will determine eligibility for QHP for each member of the household seeking health insurance coverage
- 13) If consumer requested financial assistance, FFM will determine eligibility for Medicaid, CHIP and APTC/CSR
 - a. For each applicant eligible for Medicaid or CHIP
 - i. FFM will perform an account transfer for the applicant to the State Medicaid/CHIP agency
 - b. For applicants not eligible for Medicaid/CHIP, but eligible for APTC and/or CSR
 - i. FFM will calculate Maximum APTC and CSR level
- 14) Consumer goes through shopping experience for QHPs, with the plan results default filtered by the filter provided by the partner, if applicable. If no plan results are returned due to the filter or if the consumer voluntarily chooses to do so, the filter can be removed on the FFM to allow the consumer to view all plans on the FFM that their household members can choose.
- 15) If partner website provided a return URL, FFM transfers the consumer back to the partner website. The Partner Assigned Consumer ID and FFE Assigned Consumer ID will be sent to the partner website as part of the transfer.
- 16)

On the Partner Website

- 17) Partner website may guide consumer through other product shopping options
- 18)

On FFM (No consumer interaction)

- 19) FFM will complete processing of the QHP enrollment transaction(s)
- 20) For each enrollment group, FFM will generate an x12-834 transaction for initial enrollment and transmit to the Issuer of the QHP
 - Note 1: The Agent/Broker information sent by the partner website as part of the enrollment transaction will be listed as the agent/broker on the x12-834 transaction for compensation purposes
 - Note 2: If a consumer returns to the FFM directly and performs their enrollment on the FFM, none of the partner websites through which

Federally Facilitated Marketplace (FFM)

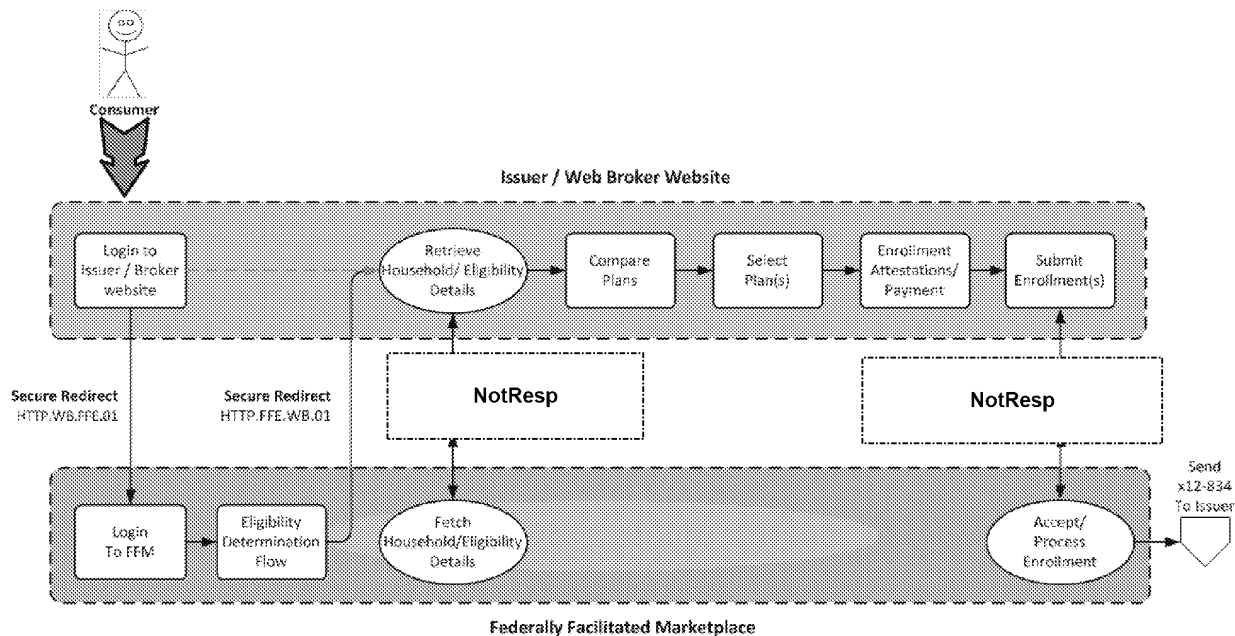
they had previously visited the FFM will be included on the x12-834 transaction

Federally Facilitated Marketplace (FFM)

B.4 Scenario #2 - Returning FFM Consumer

Figure 6 - Returning FFM Consumer illustrates the interaction between the Partner Website and the FFM under this scenario.

Figure 6 - Returning FFM Consumer



B.4.1 Scenario Overview

This scenario is an extension of Scenario #1. This applies if in Scenario #1, the consumer stops prior to enrollment and returns later to continue shopping. This also applies to other previously registered FFM consumers (either directly on the FFM or through another partner website) accessing the partner website. The consumer may continue their eligibility application from the last step during their previous interaction with the FFM website. The partner website will reuse the previously generated Partner Assigned Consumer ID (if the consumer previously registered with them) or generate a new Partner Assigned Consumer ID. The Partner Assigned Consumer ID along with the FFE Assigned Consumer ID (if available) will be used in all interactions with the FFM.

B.4.2 Sequence of Activities

The sequence of activities will be the same as for Scenario #1 with the following considerations

On Partner Website

- If the consumer returns to the same partner website, account creation would have been completed in the prior session. The consumer will need to login using their credentials for the partner website.
- If the consumer goes to a different partner website or initially registered on the FFM and goes to a partner website, they would need to create an account on the partner website. The partner website would generate a Partner Assigned Consumer ID. The consumer would also need to login to the FFM (regardless of if they already completed eligibility application on

Federally Facilitated Marketplace (FFM)

the FFM or not) to complete the association between the partner website and the FFM.

- Partner Assigned Consumer ID and FFE Assigned Consumer ID (if available) will be used in interactions with the FFM
- Consumer will resume the process at the last step they were at during the prior session but will be able move to prior steps subject to workflow rules of the partner website
- Consumer will be able to retrieve QHPs or QHP lists saved during a previous session on the partner website

On FFM

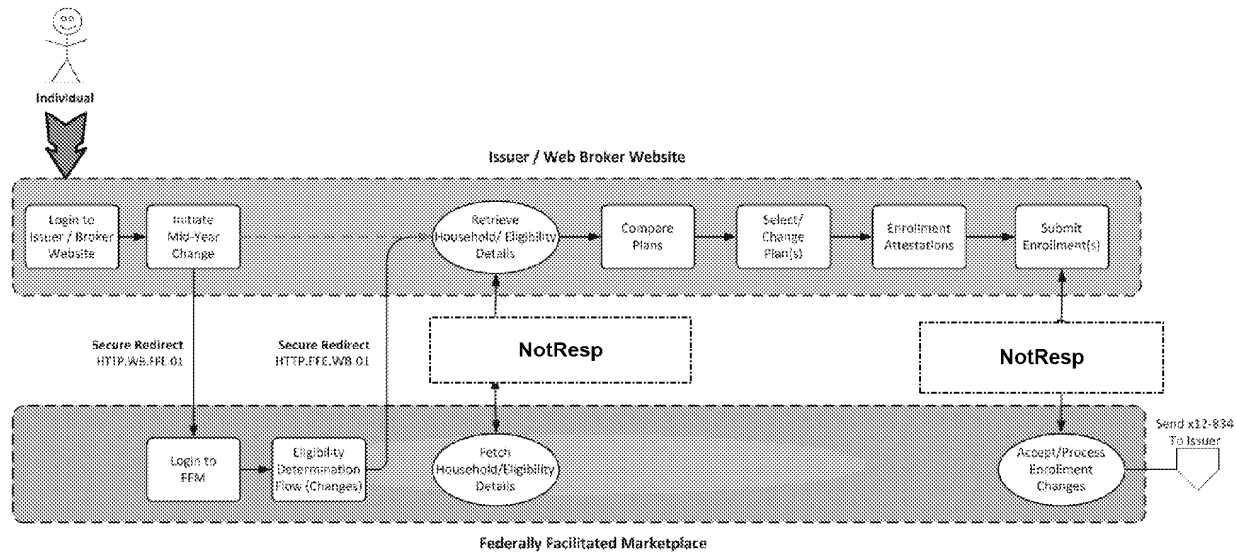
- Account creation would have been completed in the prior session. The consumer will login using their credentials for the FFM. There will not be a need for the EIDM ^{NotRes}_p workflow.
- If the consumer is transferred by a partner website that has not previously interacted with the FFM for this consumer, FFM will generate a FFE Assigned Consumer ID for this consumer/ partner website.
- Partner Assigned Consumer ID and FFE Assigned Consumer ID will be used in interactions with the partner website
- Consumer will resume the process at the last step they were at during the prior session, but can move to prior steps subject to the application workflow rules of the FFM
- Consumer may also return directly to the FFM and continue/complete their entire shopping experience on the FFM

Federally Facilitated Marketplace (FFM)

B.5 Scenario #3 - Reporting Changes Impacting Eligibility

Figure 7 - Reporting Changes Impacting Eligibility illustrates the interaction between the Partner Website and FFM under this scenario.

Figure 7 - Reporting Changes Impacting Eligibility



B.5.1 Scenario Overview

In this scenario, a consumer with a household previously enrolled in a QHP with or without APTC/CSR returns to report changes in their household membership, income or other demographic information. The changes impact their eligibility for QHP or APTC/CSR. The changes in eligibility may allow the consumer to add a new member, or change enrollments of one or more members to a new QHP that is more favorable to their current eligibility.

B.5.2 Sequence of Activities

On Partner Website

- 1) Consumer and/or members of their household are enrolled in a QHP.
- 2) Consumer may or may not have an account on the partner website. If they do not have an account on the partner website, they would create one. Otherwise, they would login using their credentials for the partner website.
- 3) Consumer indicates intent to report changes to demographic/household information for an FFM enrollment
- 4) Partner website transfers consumer to the FFM website. Information passed to the FFM includes:
 - a. Information Exchange System ID
 - b. Partner Assigned Consumer ID
 - c. FFE Assigned Consumer ID
 - d. Return URL
 - e. Keep-alive URL

On FFM

- 5) Consumer already has an account with the FFM and will login using FFM credentials

Federally Facilitated Marketplace (FFM)

- 6) Consumer reviews their account/application details on the FFM and enters changes where applicable. Changes could include:
 - a. Contact Information
 - b. Addition or removal of household members
 - c. Change in request for financial assistance
 - d. Changes in household income
 - e. Changes in availability of other health coverage (employer sponsored or other public programs)
 - f. Residency changes
 - g. Other Demographic changes
- 7) FFM will verify information entered by consumer with internal and external data sources
- 8) FFM will determine eligibility for Medicaid, CHIP and APTC/CSR (if consumer requested financial assistance)
 - a. For each applicant eligible for Medicaid or CHIP and not previously transferred to the state agency
 - i. FFM will perform an account transfer for the applicant to the State Medicaid/CHIP agency
 - b. For applicants not eligible for Medicaid/CHIP, but eligible for APTC and/or CSR
 - i. FFM calculates Maximum APTC and CSR level
- 9) FFM transfers consumer to the Return URL provided by partner website and passes back the Partner Assigned Consumer ID and FFE Assigned Consumer ID

On Partner Website

- 10) Partner website invokes the FFM Household/Eligibility web service using the FFE Assigned Consumer ID
- 11) partner website receives following information from the FFM Household/Eligibility web service
 - a. Application Contact Information
 - b. List of members and demographic Information required for plan shopping and enrollment. This will only include members requesting health insurance coverage (including those referred to Medicaid/CHIP)
 - c. Eligibility information for each member of the household including the eligibility history for the past 6 months
 - i. Eligibility for Medicaid/CHIP
 - ii. Eligibility for APTC including Maximum Monthly APTC
 - iii. Eligibility for CSR and CSR Level
 - iv. Eligibility for Enrollment Period - Initial Enrollment Period (IEP), Annual Enrollment Period (AEP) or Special Enrollment Period (SEP).
 - v. Flag indicating if a member has gained or lost eligibility for QHP and or APTC/CSR
 - d. Enrollment status of members of the household including enrollments in the prior 6 months and prospective enrollment.
- 12) For members transferred by FFM to Medicaid/CHIP during current interaction,
 - a. Partner website will notify consumer on eligibility for Medicaid or CHIP and ineligibility for APTC/CSR.

Federally Facilitated Marketplace (FFM)

- b. If the member is newly added, partner website will stop processing applicant
 - The consumer may still be able to enroll the member in a QHP without APTC or CSR
 - c. If the member is already enrolled in a QHP, the partner website will follow the process outlined in Scenario #5 - Reporting changes leading to Disenrollment.
- 13) Members previously eligible for APTC/CSR but lost eligibility due to changes reported during the current interaction, will be handled per process outlined in Scenario #5 - Reporting changes leading to Disenrollment
- 14) For members not eligible for any financial assistance (Medicaid/CHIP, APTC and CSR), partner website may present the following options to the consumer
 - a. Add member to a QHP enrollment (based on SEP) without APTC or CSR
 - b. Shop for non-exchange plans offered by the partner website.
- 15) The remaining steps on the partner website apply only if one or more members are eligible for a QHP, with or without eligibility for APTC and/or CSR and also eligible for an enrollment period (IEP, AEP or SEP).
 - Note: Based on eligibility for an enrollment period of a household member, other members enrolled in a QHP with that member may also be eligible to change plans.
- 16) Consumer goes through shopping experience for QHPs
 - a. Partner website will allow consumer to add a new member to an existing enrollment Group or reorganize enrollment groups (including creating new enrollment groups) with one or more members in each enrollment group.
 - b. Consumer may specify criteria including Plan Metal level, and premium cost to search and compare plans
- 17) At the end of the QHP shopping experience, the consumer may select a new QHP for an existing enrollment group that includes members eligible for an enrollment period or select a QHP for new enrollment groups.
- 18) Consumer will complete attestations required for enrollment including those for APTC and CSR
- 19) Consumer submits the enrollment request
- 20) Partner website will invoke the FFM Enrollment web service to submit the enrollment request. FFM will validate and process the enrollment transaction. If the transaction fails validation checks, FFM will return an exception. Otherwise, FFM will return the enrollment transaction ID.
- 21) Partner website may collect the initial premium for any new enrollment groups or enrollment groups that have changed QHPs.
- 22) Partner website may guide consumer through other product shopping options

On FFM (No Consumer Interaction)

- 23) For any existing enrollment groups that a member is added to or removed from
 - a. FFM will process QHP enrollment change transaction to add/remove members

Federally Facilitated Marketplace (FFM)

- b. FFM will generate x12-834 enrollment change transaction and transmit to the Issuer of the policy
- 24) For any existing enrollment groups from which all members have been removed
 - a. FFM will process a QHP disenrollment from the QHP (policy level)
 - b. FFM will generate an x12-834 cancellation/termination transaction for the QHP and transmit to the Issuer of the policy
- 25) For any existing enrollment groups for which the plan has been changed.
 - a. FFM will process a QHP disenrollment from the old QHP (policy level)
 - b. FFM will generate an x12-834 cancellation/termination transaction for the old QHP and transmit to the Issuer of the policy
 - c. FFM will process a QHP Initial Enrollment from the new QHP
 - d. FFM will generate an x12-834 initial enrollment transaction for the new QHP and transmit to the Issuer of the policy
- 26) For any new enrollment groups
 - a. FFM will process QHP enrollment into the new QHP
 - b. FFM will generate an x12-834 initial enrollment transaction for new QHP and transmit to Issuer
- 27) In all the above cases where FFM generates an x12-834 transaction
 - Note 1: The Agent/Broker information sent by the partner website as part of the enrollment transaction will be listed as the agent/broker on the x12-834 transaction for compensation purposes
 - Note 2: If a consumer returns to the FFM directly and performs their enrollment on the FFM, none of the partner websites through which they had previously visited the FFM will be included on the x12-834 transaction