

MNsure Staff Response
MNsure Consumer and Small Business Advisory Committee
Recommendations on Access
June 18, 2014

In furthering its mission to provide a base level of affordable and comprehensive health care coverage to all Minnesotans, it is our recommendation that MNSURE's ongoing focus on Accessibility include information about MNSURE and paths of accessibility into all aspects of the enrollment process.

1. Identify inter-agency failures and opportunities for improvement.

RECOMMENDATIONS:

- a. Identify channels of communication between consumers, county agencies, state agencies, local agencies and MNSURE that have gone unexplored or unused to demystify enrollment and coverage concerns.
- b. Investigate lack of coverage by MN Department of Corrections and lack of coverage via MNSURE/public programs of incarcerated Minnesotans in work release who cannot afford private insurance

MNsure staff response: MNsure will take this recommendation under advisement and will continue in its efforts to appropriately integrate its services with other governmental entities, including working to identify currently unexplored channels of communication.

2. Create better informational tools and product offerings to keep clients well-informed.

RECOMMENDATIONS:

- a. Integrate tools on the MNSURE website, including tools to determine the tax penalty for remaining uninsured, that are also accessible via the call center so that MNSURE users are better informed about eligibility
- b. Create product offerings that do not conceal services covered, and costs or fees that could make the coverage unaffordable

Related: <http://getcoveredillinois.gov/>
<https://www.checkbook.org/newhig2/year14/text.cfm#chapter>

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MNsire staff response: MNsire is in the process of exploring ways to improve the system and incorporate tools to improve the consumer experience for the upcoming open enrollment period.

3. Review enrollment data to gain perspective on the enrollment process.

RECOMMENDATIONS:

- a. Collect and compare enrollment data in a way that creates opportunity to streamline the process of enrollment by identifying errors, barriers, or other difficulties in enrollment.

MNsire staff response: MNsire will take this recommendation under advisement and will continue in its work to identify errors and barriers to enrollment.

4. Strengthen appeals submission process.

RECOMMENDATIONS:

- a. Post information about the appeals submission process on the MNsire website, the application form, and other MNsire materials, including information on where to access information about rights, how to initiate an appeal, who to contact for assistance, and the link to the process for initiating an appeal to a state agency.
- b. Refer individuals who may have difficulty making an appeal on their own to an agency or individual who can advocate for them
- c. Make all information on appeals available in languages other than English.

MNsire staff response: Information about the appeals submission process, including the application form, an FAQ, and redacted archived decisions (for transparency) is included on MNsire’s website at <https://www.mnsure.org/help/appeals/> and <https://www.mnsure.org/faq/appeals-faq.jsp>. MNsire is currently working to include further language on its website regarding advocacy groups, including navigators.

Individuals who have trouble making an appeal on their own may call the Contact Center for assistance, whose representatives are trained to file an appeal on the consumer’s behalf.

MNsire makes available in 5 additional languages the “Appeals rights” document, which is available on the MNsire website with other translated documents at <https://www.mnsure.org/resources/translate.jsp>.

MNsure worked with the DHS Appeals Unit and the Minnesota Office of Administrative Hearings (OAH) in developing the Appeals website materials.

5. Include information on tax penalty exemptions.

RECOMMENDATIONS:

- a. Provide uninsured Minnesotans clear guidelines as to their obligations under the ACA
- b. Be sure that enrollees are informed of policies including penalties and events that trigger a violation of the Affordable Care Act or of their provider agreement (e.g. enrollment, but failure to pay premium).

MNsure staff response: Information about the health coverage mandate is currently on the MNsure website at <https://www.mnsure.org/individual-family/mandate/>. The webpage includes information on fines as well as links to information on exemptions from the individual mandate, information provided by the U.S. Department of Health and Human Services summarizing the ACA's primary effects on individuals, and other additional links.

Additionally, Contact Center employees receive training on the terms of the ACA tax penalties and corresponding exemptions and are prepared to address questions from consumers relating to these matters generally. Contact Center employees advise callers to contact their tax adviser for personalized information.

6. Improve program transparency to access partner compliance officer and compliance processes.

RECOMMENDATIONS:

- a. Provide follow-up to compliance reports so that reporting parties are aware of the actions taken to ensure compliance.

MNsure staff response: MNsure is currently being audited by several external parties including the Health and Human Services Office of Inspector General, the Minnesota State Office of the Legislative Auditor, and independent third-party private firms contracted to perform audits. These audits generate reports which contain findings and recommendations and are generally public documents once the audit is complete unless the information they contain is classified as not-public data under the Minnesota Data Practices Act. MNsure has a process in place to track findings and recommendations and to provide updates to management and the auditors on the status of addressing the findings. MNsure is in the process of

revamping its compliance program, and the current system will be reviewed as part of this effort.

7. Create an application process that is minimally intrusive.

RECOMMENDATIONS:

- a. Build consumer trust by using a minimally intrusive enrollment process, i.e. collect only the information that is necessary to process the application correctly

MNsire staff response: As part of certification, MNsire was required to complete a Privacy Impact Assessment (“PIA”) for submission to CCIO. The purpose of the PIA was to identify the types of personally identifiable information (“PII”) that MNsire would be collecting, the purpose for such collection, the possible uses of such PII, and the individuals who would have access to such PII. The overall goal of this assessment was to have MNsire look critically at its collection of PII and assure that it is only collecting and using the PII necessary to carry out its functions. Since the initial certification process, MNsire has determined that additional such assessments – more targeted to particular functions – are a useful part of ongoing operations, and, as such, has begun conducting these assessments.

8. Saturate the marketplace with effective and culturally appropriate communication of MNSURE’s purpose and benefit.

RECOMMENDATIONS:

- a. Create clarity in the marketplace regarding the purpose and benefit of the exchange by clear marketing and effective, understandable language-use by MNSURE representatives.
- b. Make sure that MNSURE materials and access points are culturally competent and properly translated or interpreted to consumers of different lingual and cultural backgrounds.
- c. Ensure that gender sensitive language and alternative pronouns are used on all marketing when referring to Minnesota individuals and families to avoid marginalization of LGBT+ Minnesotans.
- d. Ensure that materials are readable for those at lower reading levels.

MNsire staff response: Clarity in the marketplace regarding the purpose and benefit of the exchange is the goal in all the marketing materials MNsire produces and has been of particular concern in usability work that has taken place since the last open enrollment period ended. MNsire does

the best it can to ensure its materials are culturally sensitive and appropriately translated or interpreted. Readability of materials at lower reading levels is also a goal in all marketing materials MNsure produces.

Regarding gender sensitive language and alternative pronouns, MNsure will take this recommendation under advisement as it moves forward.

9. Focus on inter-agency partnerships and assister partnerships to better identify where they have failed or been less effective than intended including relationships between DHS, assisters, county staff and other organizations to improve system-wide responsiveness to enrollee needs.

RECOMMENDATIONS:

- a. Pursue and maintain active and thorough communication with local agencies that provide MNSURE outreach and navigation to Minnesota residents.
- b. Provide funding so that local groups can print MNSURE information that has been approved by MNSURE media teams.

MNsure staff response: MNsure will continue to monitor its partnerships with governmental and non-governmental entities for signs of success or failure and will evaluate those relationships on an ongoing basis, making adjustments and corrections as needed. MNsure will maintain its prioritization of enrollee needs above other considerations and recognize ways in which it can leverage partnerships to better meet those needs.

Under the 2014/2015 marketing plan and the 2014/2015 outreach and enrollment grants plan, MNsure allows approved local groups to print MNsure information.

10. Ensure that frontline staff is able to quickly and easily access supervisory help for situations that require a more intensive response

RECOMMENDATIONS:

- a. Customer service must focus on clear and correct information, with the ability to elevate matters seamlessly through the organization as needed to ensure the highest levels of quality and service.

MNsure staff response: MNsure intends to maintain its Contact Center structure that allows calls to be escalated to supervisors when appropriate. MNsure maintains its commitment to providing top-quality customer service

interactions, placing resolution of customer requests as the highest priority. Many of MNsure's escalated calls involve technical issues. MNsure is working to alleviate these technical issues, which would provide faster response time to consumer requests.

11. Provide information about the process of Special Enrollment

RECOMMENDATIONS:

- a. Enrollees must have access to responsive and accurate information when they are eligible for special enrollment periods, and for how long

MNsure staff response: Information about the special enrollment period for consumers canceling COBRA is currently on the MNsure website at <https://www.mnsure.org/individual-family/families/COBRA.jsp>. The webpage includes information on options for those eligible for special enrollment.

Additionally, Contact Center employees receive training on the conditions of special enrollment periods and are prepared to address questions from consumers relating to these matters.

12. Effectively communicate enrollee eligibility for plans and programs.

RECOMMENDATIONS:

- a. Ensure that point of contact with enrollees is singularly focused on accurate, correct and complete information required to navigate the enrollment process.

MNsure staff response: Contact Center representatives are provided a step-by-step training in enrolling a consumer through MNsure. The training, in part, consists of when a consumer should be referred to a navigator or broker for plan selection, referred to DHS due to public program eligibility, assisted in the manual enrollment process, or guided through the online enrollment experience. Contact Center representatives are provided with resources and tools, such as workbooks and income charts, to assist them in providing accurate and correct information to consumers.

13. Ensure accurate and culturally sensitive assistance

RECOMMENDATIONS:

- a. Follow up on cultural or geographic relevant shortcomings which arose during the initial enrollment period through focus group discussions with racial, cultural ethnic groups and consumers with disabilities

- b. Ensure that points of contact so that these groups have the proper access and tools to address these issues moving forward in the exchange process.

Related:

<http://kaiserfamilyfoundation.files.wordpress.com/2013/01/8396.pdf>

MNsire staff response: MNsire will take this recommendation under advisement. Currently, MNsire has created navigator, broker, and certified application counselor stakeholder groups to review and provide input on operational and policy implementation plans. These groups are intended to provide operational and policy transparency with stakeholders and facilitate operational and policy development with stakeholder input. These stakeholder groups launched in August 2014.

14. Provide partner/assisters who can assist people who, for various reasons, might have difficulty reading, writing, or comprehending English

RECOMMENDATIONS:

- a. Identify need areas for additional resources through focus group discussions and supplement the number of peer assisters
- b. Provide materials and ready assistance not in print-form for these groups

MNsire staff response: MNsire's 2014/2015 Outreach and Enrollment grantees will fulfill the role of identifying populations that face barriers to enrollment, providing one-on-one assistance to help them apply, and developing resources specific to the needs of these populations.

15. Provide access to assistance that facilitates consumer confidence.

RECOMMENDATIONS:

- a. MNSURE must increase efforts at communicating the purpose and goal of the exchange throughout Minnesota.
- b. Decision-making aid should be available in the purchase for the variety of issues relevant to differing income brackets, as well as culturally diverse groups

MNsire staff response: MNsire works to communicate the purpose and goal of the exchange throughout Minnesota on a regular basis as it is part of the core essential function of the communications team and the larger the external affairs team. MNsire will continue to view this as a crucial component of its everyday work moving forward.

Certified brokers, navigators and assisters are available at no cost to consumers to assist with the application and enrollment process. The MNsure website has a list at <https://www.mnsure.org/assisters/assister-directory.jsp>. The directory will indicate if a broker or navigator speaks a language other than English, and Contact Center representatives are able to refer consumers to them as needed. The Contact Center also has access to the language line to assist those consumers that may not want to use an assister. Through the language line, Contact Center representatives have access to interpreters in numerous languages.

16. Accept a variety of methods of application

RECOMMENDATION:

- a. Allow a variety application methods including paper copies that are accepted at the county level

MNsure staff response: At this time, while counties are not processing QHP paper applications, consumers can complete a paper application at the county and forward it to MinnesotaCare Operations for processing.