

8/13/2024

**VIA ELECTRONIC MAIL:** [CGardner@GeorgiaAccess.ga.gov](mailto:CGardner@GeorgiaAccess.ga.gov)

Cheryl S. Gardner  
Exchange Director  
Georgia Access  
2 Martin Luther King Jr. Dr.  
West Tower, Suite 702  
Atlanta, GA 30334

Dear Director Gardner,

I am pleased to confirm that the State of Georgia (“Georgia” or “the State”) has conditional approval to establish a State-based Exchange (SBE) for plan year 2025. Congratulations to the Georgia Access team on reaching this significant milestone on the path to establishing an SBE for the residents of Georgia.

This conditional approval reflects the progress Georgia Access has made in demonstrating implementation of outstanding Exchange functionality identified to the State in the July 27, 2023 conditional approval letter<sup>1</sup> as necessary for a SBE to provide affordable, quality coverage for consumers for plan year 2025. The Centers for Medicare & Medicaid Services (CMS) has reached this decision based on Georgia’s SBE Blueprint Application attestations, progress to date, and expected progress across the entire spectrum of Exchange requirements. CMS’s conditional approval is contingent upon the following conditions:

1. Continued compliance with federal regulations, and continued compliance and/or demonstration of the ability to perform required Exchange activities in line with the attestations Georgia Access has made in its SBE Blueprint Application submission;
2. Agreement to monitor and implement future Federally-facilitated Exchange (FFE) Enhanced Direct Enrollment (EDE) change requests, as applicable and on a timely basis, similar to the FFE, and
3. Please find appended to this letter, a chart summarizing CMS’s assessment of Georgia Access’ progress around key SBE transition activities, which includes notable requirements Georgia Access must maintain or continue to meet, to keep conditional approval.

We look forward to continuing our partnership with Georgia Access and are committed to providing your team our ongoing support and technical assistance to help Georgia Access succeed.

Thank you,



Ellen Montz, Ph.D.  
Director, Center for Consumer Information & Insurance Oversight  
Deputy Administrator, Centers for Medicare & Medicaid Services

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<sup>1</sup> <https://www.cms.gov/files/document/ga-conditional-approval-letter.pdf>



Attachment: Georgia Access – CMS Assessment of Key SBE Transition Activities

Key Functional Area	State Progress
<b>Federal Data Services Hub (HUB) Authority to Connect (ATC)</b>	<ul style="list-style-type: none"> <li>Georgia Access (GA) submitted all final MARS-E privacy and security documents, and GA received conditional 3-year Authority to Connect to Federal Data Services HUB (FDSH) on 8/22/2023.</li> <li>IRS approved GA’s continued Safeguard Security Report (SSR) on 8/1/24.</li> </ul>
<b>Federal Data Services Hub (HUB) Testing</b>	<ul style="list-style-type: none"> <li>GA completed real-time services testing, and some bulk services testing in 2023. Georgia is currently finalizing testing of the Verify Current Income service (which was not available to Georgia for testing in 2023 and is being tested as a back-up plan to use of Georgia Department of Labor data). TDS testing for VCI was held 7/26 with an additional test window being scheduled for early August.</li> <li>GA will complete all HUB testing by the end of August 2024.</li> <li>Policy-based Payment testing was delayed due to an unforeseen CMS conflict. GA will complete testing after 8/2/24, when the CMS environment is again available.</li> </ul>
<b>Plan Management</b>	<ul style="list-style-type: none"> <li>GA successfully demonstrated capability to transfer Qualified Health Plan (QHP) plan data to state platform and tested and demonstrated to CMS the associated plan display, quality rating display, APTC and premium calculation functionality on the state’s platform.</li> <li>GA will be able to complete transfer of Plan Year 2025 QHP plan data to their state platform by 8/2/24.</li> </ul>
<b>Eligibility and Enrollment</b>	<ul style="list-style-type: none"> <li>GA submitted a Concept of Operations document on 03/09/2023, which outlined the Exchange’s proposed Georgia Access Eligibility System that will perform all MAGI-based eligibility assessments and determinations and will refer Medicaid/CHIP-eligible individuals and households to the GA Gateway (Medicaid agency) System via account transfer.</li> <li>GA participated in operational readiness reviews (ORRs) with CMS to demonstrate core eligibility system functionality, on 5/25/23, 5/26/23, 6/9/23, 6/15/23, and 6/16/23. GA Access and GA Gateway participated in two ORRs to demonstrate account transfer functionality on 6/28/23. Following these demonstrations, CMS has continued to provide GA with feedback along with key improvements to both the single streamlined application and the account transfer processes, and described these key changes in the “CMS Required and Recommended Changes” document</li> <li>In 04/24 and 07/24 GA provided CMS with screenshots along with written documentation, that per CMS review, demonstrates implementation of all but three of these key changes and improvements.</li> <li>To maintain conditional approval, GA must address the following open items identified through CMS’ reviews and implement necessary changes as described:</li> </ul>



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	<p><b>Prior to Open Enrollment:</b></p> <ul style="list-style-type: none"> <li>GA will complete three outstanding changes to its single-streamlined application and share screenshots of these changes no later than 10/25/2024, as outlined and agreed upon in the most recent iteration of the “CMS Required and Recommended Changes for Georgia” document.</li> </ul>
<p><b>Enhanced Direct Enrollment (EDE)</b></p>	<ul style="list-style-type: none"> <li>GA has modeled its EDE program on the FFE’s program, and the requirements communicated by GA align with the requirements articulated in new regulations at 45 CFR 155.220 and 221. FFE certification as an EDE is a core requirement for application as a GA EDE partner, so organizations failing to pass FFE review for compliance are not considered for certification with GA.</li> <li>GA and HealthSherpa (GA EDE partner) participated in an ORR demo of HealthSherpa’s consumer portal on 7/21/23.</li> <li>Since the HealthSherpa ORR demo, GA has continued to conduct Operational Readiness testing with prospective GA EDE partners, using test scenarios derived from CMS’s suite of FFE EDE test cases. GA has provided CCIIO access to the State’s repository of EDE test case results, facilitating CCIIO’s parallel review of the GA EDE test screenshots and associated Eligibility Determination Notices (EDNs).</li> <li>GA is underway with Blind Audit testing, whereby State staff lead testing in GA EDE partners’ applications. The State is also implementing specific critical FFE EDE Change Requests (CRs) identified by CCIIO into EDE operations with the GA centralized eligibility and enrollment platform.</li> <li>To maintain conditional approval, GA must address the following open items identified through CMS’ reviews and implement necessary changes as described:</li> </ul> <p><b>Prior to Open Enrollment:</b></p> <ul style="list-style-type: none"> <li>GA will complete Operational Readiness testing and Blind Audit testing with prospective GA EDE Partners and resolve any identified issues. The State will also provide screenshots verifying GA EDE Partners have implemented FFE Change Requests (CRs) 66, 67, and 68 as it pertains to EDE operations with the GA centralized eligibility and enrollment platform.</li> </ul> <p><b>Post Open Enrollment:</b></p> <ul style="list-style-type: none"> <li>GA will require EDE Partners to implement FFE CRs 81 through 84 for Plan Year 2025 and will provide evidence (screenshots) to verify EDE implementation of these CRs as it pertains to EDE operations with the GA centralized eligibility and enrollment platform. GA will continue to monitor the CMS EDE Change Request (CR) Tracker, and coordinate with CCIIO concerning implementation of future FFE EDE CRs as it applies to operations with the GA centralized eligibility and enrollment platform.</li> <li>GA will develop a process to communicate State-initiated EDE</li> </ul>



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<p><b>Consumer Assistance</b></p>	<p>CRs to CCIIO, as well as provide regular updates about the State's EDE program.</p> <ul style="list-style-type: none"> <li>GA incorporated CMS feedback on its consumer-facing SBE website, both from the 2023 ORR reviews and further feedback provided in summer of 2024. GA updated its consumer-facing SBE website to make navigation to its consumer portal more obvious and accessible, as well as included descriptors regarding the various enrollment-assistance options available to consumers as subsequent options to the consumer portal. Revised website mockups were submitted to CCIIO on 7/24/24 to address CMS feedback, which GA noted will be finally implemented by mid-October</li> <li>GA call center development plan was updated as requested by CCIIO.</li> <li>GA provided a transition-related stakeholder communications plan on 7/17/24, including a timeline for the State to send initial transition-related stakeholder communications by an agreed-upon date, which CMS approved.</li> <li>To maintain conditional approval, GA must address the following open items identified through CMS' reviews and implement necessary changes as described:</li> </ul> <p><b>Prior to Open Enrollment:</b></p> <ul style="list-style-type: none"> <li>GA will provide results of its stakeholder focus group testing and feedback regarding its consumer-facing SBE website for consumer usability, along with updates on its progress towards final implementation of updates to SBE consumer-facing website as agreed upon with CMS.</li> </ul>