



Missouri Department of
SOCIAL SERVICES
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July 14, 2014

Cindy Mann, Director
Department of Health & Human Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard, Mail Stop S2-26-12
Baltimore, Maryland 21244-1850

Dear Ms. Mann:

I am writing in response to your letter of June 27, 2014.

As you have requested, the actions Missouri will take to complete programming necessary to send account transfers to the CMS Federally-Facilitated Marketplace (FFM) and the timeframe within which this work will be completed is provided as an enclosure with this letter.

With regard to the processing of account transfers received by the state from CMS, Missouri has received 51,600 account transfers since February 17, 2014 as follows:

| | |
|-----------------------|------------|
| February (after 2/17) | 16,900 |
| March | 17,400 |
| April | 7,400 |
| May | 7,400 |
| June | 1,900 |
| July (through 7/10) | <u>600</u> |
| TOTAL | 51,600 |

As of July 10, we have completed 39,000 applications; the remaining 12,600 applications are in the MEDES system and are in the process of being reviewed for eligibility. Many account transfers have eligibility criteria that must be verified, thus necessitating intervention by our staff to afford the applicant an accurate determination of their eligibility and to ensure the state's Medicaid eligibility laws are faithfully applied. As this is the case, there will always be some transfers in process of being reviewed, although the number in this status is expected to continue to trend downward by approximately 1,000 per week for the next several weeks before leveling off.

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We are finding that a relatively small number of the account transfers from CMS are eligible for Missouri Medicaid coverage. Of the 39,000 account transfers completed, 3,100 (8%) have been found to be eligible under Missouri's current MAGI standards. The current transfer standards would appear to give too many applicants a false expectation of coverage under Missouri's Medicaid program. We believe a discussion on this issue will help both the state and the CMS provide a better and more efficient service to the citizens we both seek to serve.

Sincerely,

A handwritten signature in black ink that reads "Juleria Huhn for Joe Parks". The signature is written in a cursive, flowing style.

Joseph Parks, M.D.
Director

Enclosure

Enclosure

MEDES CMS MITIGATION PLAN

MITIGATION PLAN

BACKGROUND

The Missouri Eligibility Determination and Enrollment System (MEDES) is a COTS solution based upon IBM's Curam Product.

The Curam product functionality to perform the exchange of data between the Curam eligibility systems and the FFM has been problematic. Missouri has been monitoring Curam releases and upgraded to 6.0.5.3 ifix 7 in April with the understanding that the release would solve the issues. Missouri has reached out to other states to seek solutions and recently received code for the account transfer from the FFM to the CURAM product from Arkansas. A critical PRM was opened with IBM to address the situation.

Applications received by Missouri dated between 10/1/2013 and 12/31/2013 were processed in the legacy system using existing eligibility rules. The applications that were denied during that time period were entered into the MEDES system after January 1st to determine if the applicant would qualify under the MAGI rules.

Missouri implemented a "better door" process in the MEDES Citizen Portal in November, 2013. This process does an initial screening prior to application completion, and where applicable suggests the applicant may be over income for Medicaid and should consider applying at the FFM. The system captures those who leave the application at that point.

MEDES 3813 - PRODUCTION FUNCTIONALITY OF ACCOUNT TRANSFER (AT) TO THE FFM AND AT RESPONSE (ATR) TO THE FFM

Ticket MEDES-3813 is open to address the gap in functionality. The design documents are in final review, and development is expected to begin 7/21/14 with unit testing ending no later than August 8th. The project schedule has been adjusted and resources assigned to this task.

Testing will be needed to ensure the information coming out of the CURAM extract is accurate. Systems Integration and User Acceptance Test teams will work together to expedite acceptance testing. This work will occur August 11th through August 29th.

As with any interface, end to end testing of modifications should be completed. SOAP UI testing has been completed to ensure the infrastructure is in place. Missouri has confirmed that the testing meetings continue with Phil Tenet and have added the meeting to the team's schedule. A key assumption is that CMS will partner with MO to ensure testing issues are quickly identified and resolved.

MEDES 3520 – SENDING BACKLOG DATA TO THE FFM

MEDES 3520 - Strategy to Send Backlog Account Transfers to the FFM

The denied applications will be extracted from MEDES where the denial date is prior to the start of the automated AT to the FFM in production. The denied list will exclude applications that were rejected for reasons other than ineligibility, for example the application was withdrawn, or duplicates an application received from the FFM.

The data set will be sent as soon as the functionality is ready, and the data transfer will be complete by August 29, 2014.

MEDES 3520 - Strategy to Send Backlog Account Transfer Response to the FFM

The account transfer response backlog will be broken into multiple data sets. Applications that have been approved or denied in the MEDES system, as well as applications that were determined to be duplicates or had invalid data on the record set.

The data sets will be sent as soon as they are ready, and the data transfer will be complete by August 29, 2014.

MITIGATION SUMMARY TIMELINE

| Date (2014) | Milestone |
|-------------|--|
| August 8 | MEDES-3183 Account Transfer and AT Response development and unit test complete. |
| August 11 | MEDES 3183 - Shared SIT and UAT begins |
| August 15 | MEDES 3520 – AT and ATR backlog process unit testing completed. |
| August 29 | MEDES 3183 - Testing Completed MEDES 3520 – Testing Completed. |
| August 29 | MEDES 3183 - Production Migration |
| August 29 | MEDES 3520 – Production Migration Send non-MAGI account transfer response data set. (Periodic sets until non-MAGI is moved to MEDES 12/31/2015). Send final MAGI account transfer backlog Send final MAGI account transfer response backlog |
| August 31 | Application processing current within timeframes |