

Appendix A

Consumer-Centric Approach

Adopting a consumer-centric approach to eligibility determinations and enrollment in health and human services programs is essential to the core purpose of the Affordable Care Act and should be a key focus for the successful modernization of new and existing electronic systems. Such an approach accounts for the needs and preferences of the consumer and considers functions, tools and/or applications that facilitate State efforts to support consumers in enrolling for and maintaining health coverage and other human services benefits.

Key components of a consumer-mediated approach include:

- Allowing consumers to apply for or renew benefits online;
- Providing superior customer service, facilitated by real-time transactions and multiple modes of communication between consumers and States;
- Allowing third parties to assist consumers in enrolling for and maintaining benefits; and
- Seamlessly integrating systems that serve the consumer in pursuit of health coverage (e.g., health insurance Exchanges, Medicaid, CHIP, private insurance) and human services programs (e.g. SNAP, TANF).

Definitions

- *Consumer Usability*: The International Standards Organization (ISO) defines usability as “the extent to which a product can be used by specified users to achieve specified goals with effectiveness, efficiency and satisfaction in a specified context of use.” Usability is a qualitative attribute that assesses how easy user interfaces are to use. The word “usability” also refers to methods for improving ease of use during the design process.
- *Consumer Mediated*: Adopting approaches where the consumer has the authority to make choices and direct use and reuse (i.e., for themselves, by programs or by other authorized third parties) of their enrollment information to the extent practicable.

Key Assumption

While the primary charge of the Workgroup was the development of protocols and standards for electronic eligibility and enrollment processes and systems, States will likely use a variety of strategies. These methods might include:

- Online or mail in applications;
- Phone service;
- Assistance from third parties such as family members, care givers, community-based organizations, health providers or others;
- In person services, when desired.

To accommodate the needs of various populations and ensure consumers have easy, timely access to the benefits they need, consumers should be able to begin the process through any available channel. Regardless of the method used to apply, the consumer should have access to

the full range of coverage options and services, should receive clear, understandable instructions on future steps, and should be continuously supported through the application process and into enrollment, if eligible.

For example, a consumer may begin the application process online, but find that he or she is unable to complete the application for any number of reasons including technical difficulties or lack of information. If this occurs, the consumer should be able to submit the remaining information and complete the application process through another modality including over the phone or in person, with assistance if desired. Flexible, adaptable processes that support consumers through the process ensure the consumer is able to obtain and retain the needed benefits.

Consumer-Friendly User Interface

Recommendation 2.2 provides for the development of a Federal reference software model, implementing standards for obtaining verification of a consumer's initial eligibility, renewal and change in circumstances information from Federal agencies and States. When planning for the integration of this reference software into new or existing systems, States should consider developing a reference application with a consumer-friendly user interface design. This application may, but not necessarily, be full-featured software. At a minimum, it should adequately represent a consumer-mediated workflow.

An initiative at the Internal Revenue Service (IRS) highlights a consumer-mediated approach that could be applied in the health and human services eligibility process. IRS provides an automated tool that allows individuals applying for student aid to obtain necessary tax return information from IRS electronically, review it, elect whether or not to export the data to the electronic student aid application and seamlessly use the data to complete the student aid application.

Consumer-Friendly Design and Access

Eligibility and enrollment systems should be designed and built to meet the diverse needs of users (e.g., consumers, State personnel, other third party assisters) without barriers or diminished function or quality. Guided by this framework, electronic eligibility and enrollment systems should include usability features or functions that achieve the following:

- Assist the consumer in understanding their rights and meaningfully choosing among available options (e.g., privacy options, application options, coverage options);
- Guide the consumer through screen-and-enroll processing in a reliable, accurate manner that supports efficient data entry (e.g., requiring the minimum amount of data and supporting documentation from the consumer) in as close to real-time as possible;
- Provide and solicit information at an appropriate literacy level that meets the language needs of the consumer;
- Accommodate the needs of persons with disabilities including through the use of assistive technologies;
- Allow for storage of data – including documents and data supplied by the consumer, obtained from other sources, and/or inferred or derived from other data – for reuse in the renewal process;

- Allow the consumer to view, print, save, and export the data in a format that can be used and reused by the consumer;
- Facilitate the consumer to submit documentation where necessary (e.g., to demonstrate a change in circumstances);
- Enable the consumer to use the system from multiple locations and over time without having to re-enter data or re-start the process;
- Provide status updates to inform the consumer of where they are in the enrollment process and what, if any, action may be required to complete the process;
- Provide a process whereby consumers can make inquiries to State personnel, resolve disputes regarding data inputs, verification and eligibility decisions and, where necessary, formally appeal decisions; and
- Facilitate a consumer's ability to obtain assistance from third parties such as family members, care givers, health care providers and community-based organizations in their efforts to complete the application and renewal process.

States should also consider implementing system functions or communication tools to ensure consumers receive clear, timely information on their application and enrollment status and benefits. A critical step to ensuring receipt of routine and/or urgent notices is allowing the consumer to designate a preferred mode of communication (e.g., email, text message, voicemail).

An initiative at the Department of Homeland Security (DHS) highlights the effectiveness of these types of consumer communication tools. DHS recently launched a new website that allows legal immigrants to check the status of their applications online and via text message. In its first month alone, three million people registered to receive text message updates on the status of their applications.