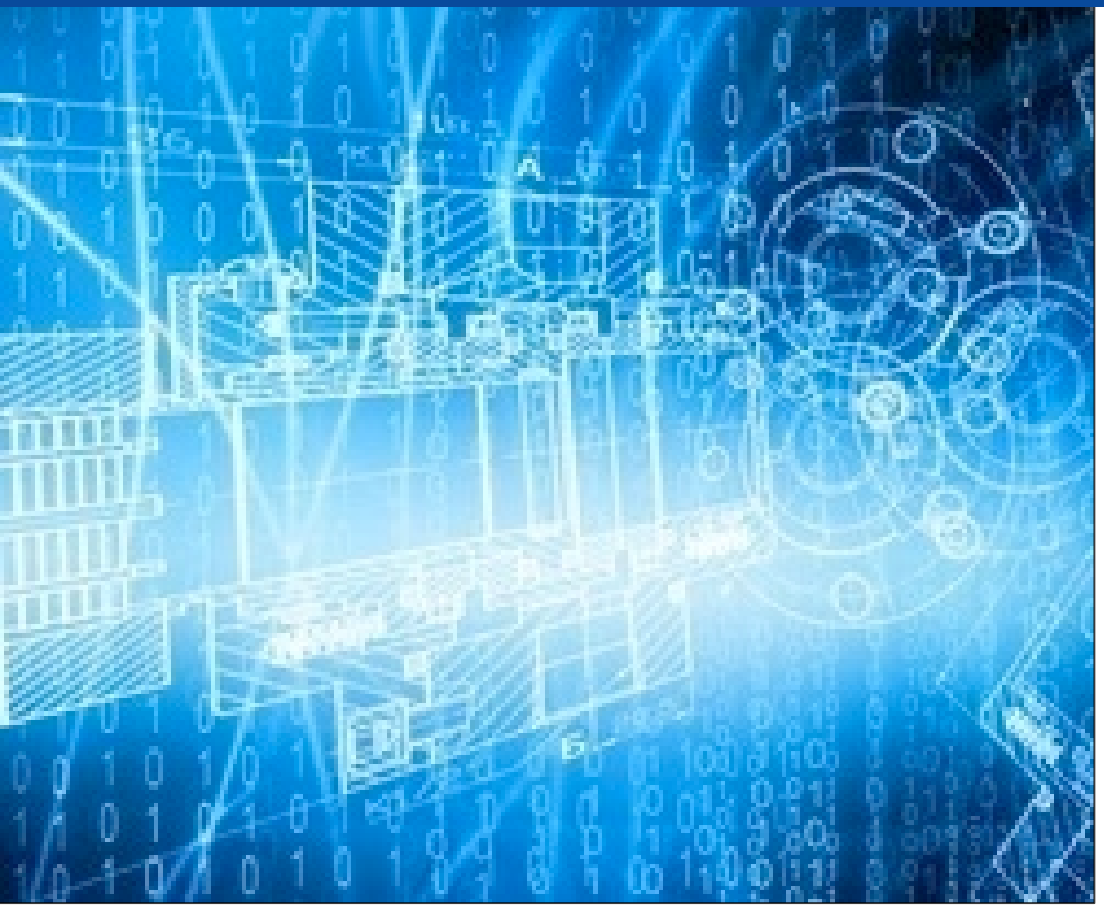
CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

HIOS Non-Federal Governmental Health Plan Module Training



June 16, 2016

Agenda

- Policy Background for the Non-Federal Governmental Health Plan Module (Non-Fed)
- Overview of CMS Enterprise Portal Registration
- Overview of HIOS Access
  - ✓ Accessing HIOS
  - ✓ Registering Organization(s)
  - ✓ Requesting User Roles
- Walkthrough of the Non-Fed Governmental Health Plan Module
  - ✓ Enter in health plan information
  - ✓ Submit HIPAA-Opt Out Information
  - ✓ Edit HIPAA-Opt Out Information
- Reference Documents
- Questions & Answers

Non-Fed Policy Background

What is a Non-Federal Governmental Plan?

- The Public Health Service Act section 2791(d)(8)(B) defines the term "Non-Federal governmental plan" as a governmental plan that is not a Federal governmental plan.

- Examples include, but are not limited to, plans that are sponsored by:
  - States
  - Counties
  - School districts
  - Municipalities

Who Regulates?

- Framework for enforcement of non-Federal governmental plans:
  - Part A of title XXVII of the Public Health Service Act (PHS Act) through enactment of Health Insurance Portability and Accountability Act of 1996 (HIPAA)
  - Reorganized under The Patient Protection and Affordable Care Act (ACA), enacted on March 23, 2010, and the Health Care and Education Reconciliation Act of 2010, enacted on March 30, 2010.

CMS Enforcement

- The provisions of title XXVII of the PHS Act that apply to group health plans that are Non-Fed plans are enforced by the Centers for Medicare & Medicaid Services (CMS) under PHS Act section 2723(b)(1)(B) using the procedures described in § 150.301 et seq.

HIPAA Opt-Outs

- Currently, self-funded, non-Federal governmental plans may opt-out of the following:
  - Women's Health and Cancer Rights Act of 1998 (WHCRA)
  - Mental Health Parity and Addiction Equity At (MHPAEA)
  - Newborns' and Mothers' Health Protection Act (NMHPA)
  - Michelle's Law

Submitting HIPAA Opt-Outs

- HIPAA opt-outs previously were accepted via U.S. mail, fax, and email.

Electronic Submission of Opt-Outs

- On May 27, 2014, CMS published the final regulation addressing the Health Insurance Portability and Accountability Act (HIPAA) opt-out election process (79 FR 30240).
- One of the changes made as a result was that hard copy election documents via U.S. mail or facsimile were only accepted through December 31, 2014, after which only elections submitted through electronic submission will be accepted.

Submission of Opt-Outs Through HIOS

- On July 21, 2014, CMS issued sub-regulatory guidance titled "CCIIO Sub-Regulatory Guidance: Updated Procedures and Requirements for HIPAA Exemption Election through the Health Insurance Oversight System (HIOS)."

CMS Enterprise Portal Registration

Process of Gaining HIOS Access

HIOS can be accessed through the CMS Enterprise Portal at http://portal.cms.gov

To be able to access the HIOS application, new users will need to complete the EIDM registration process.

Once users have completed the EIDM registration, they can request access to the HIOS application where they are prompted to fill in the HIOS account information.

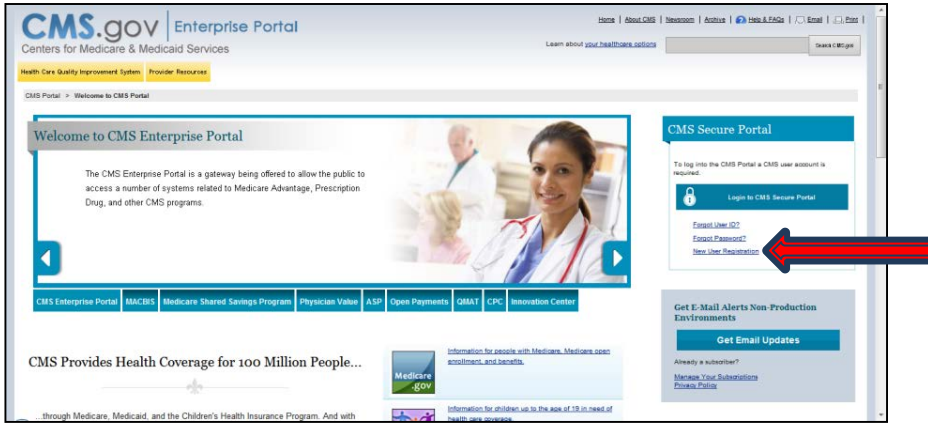
Upon completion, users will receive an authorization code which they will need to enter on the Request HIOS access page to complete the process. Please note, beginning June 19th new HIOS users will be required to go through Remote Identity Proofing [RIDP] as part of the identity verification process.

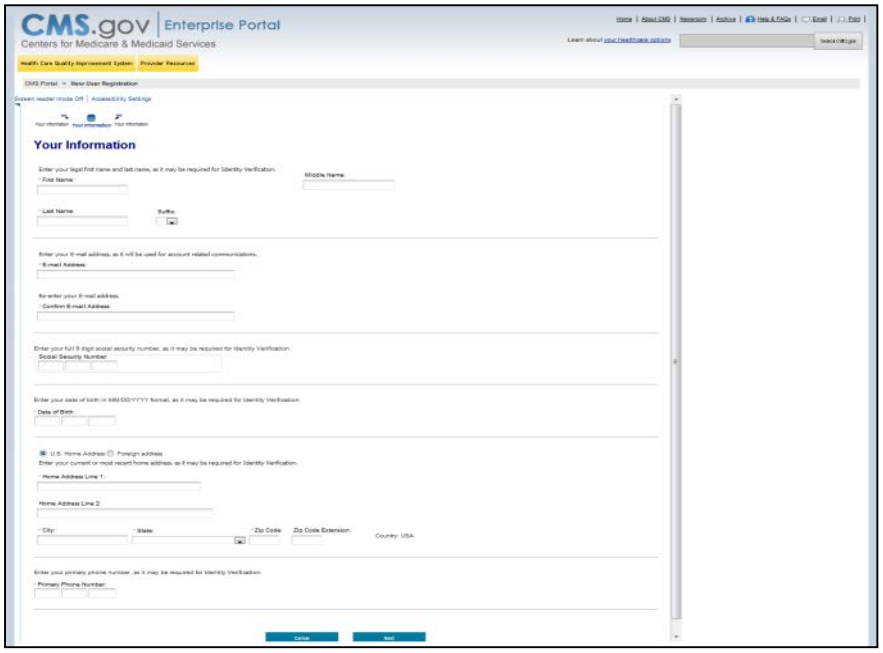
Once completed, users can now access the HIOS application and its functionalities based on what user roles they have within the system.

New Users – EIDM Registration

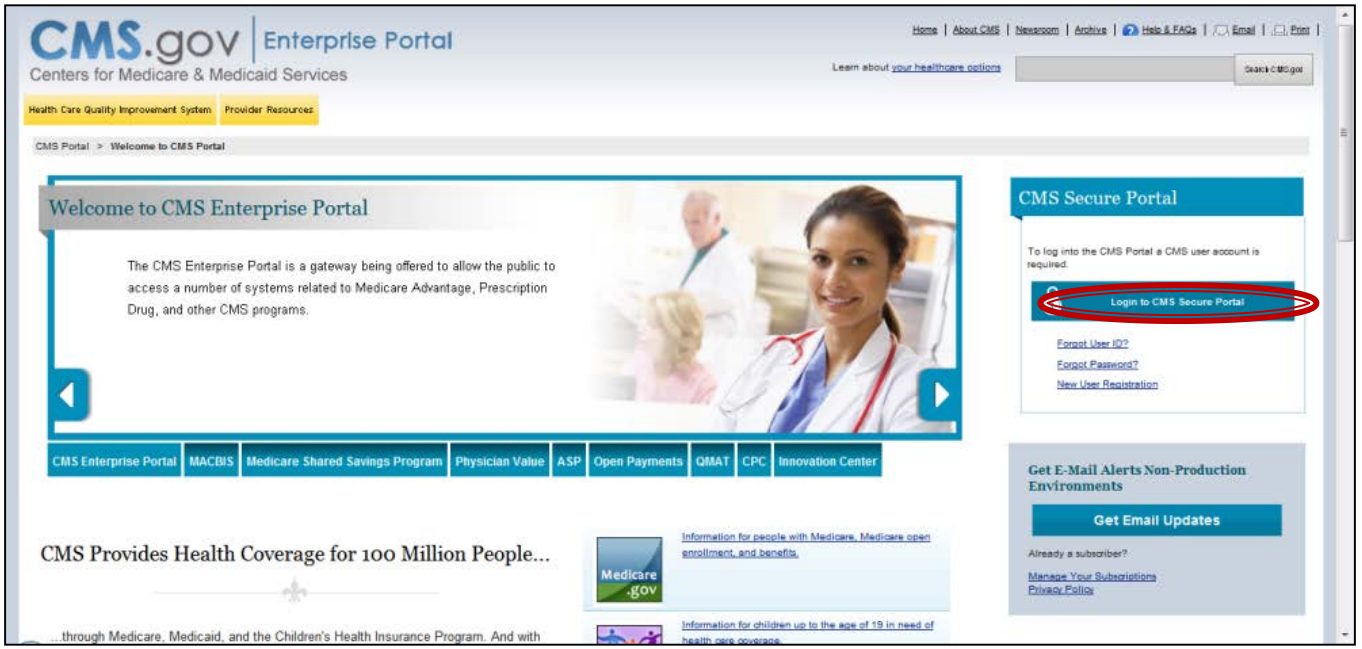
New users will navigate to the CMS Enterprise Portal, https://portal.cms.gov

- Select the "New User Registration" link
- Agree to the Terms and Conditions
- Enter the required information on the New User Registration Page
- Create User ID and Password
- Select Challenge Questions and Answers
- Submit account request
- Receive email with EIDM User ID and Password





HIOS Account Registration

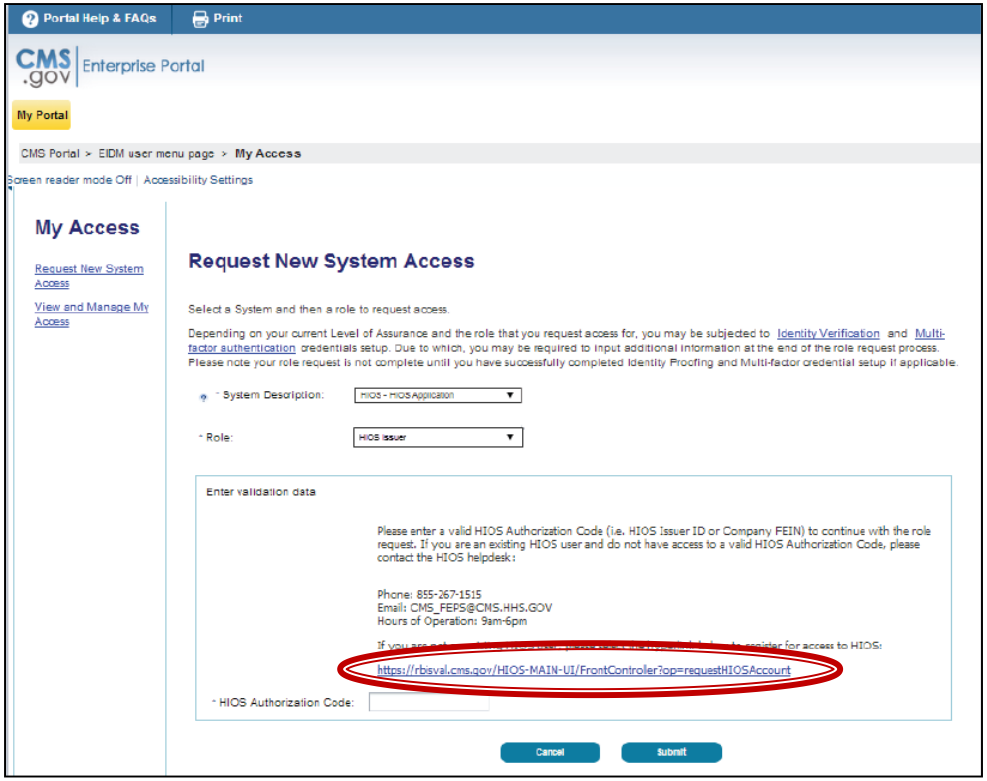


New users will navigate to the CMS Enterprise Portal, https://portal.cms.gov

- Select the "Login to CMS Secure Portal" link
- Agree to the Terms and Conditions
- Enter the EIDM User ID and Password

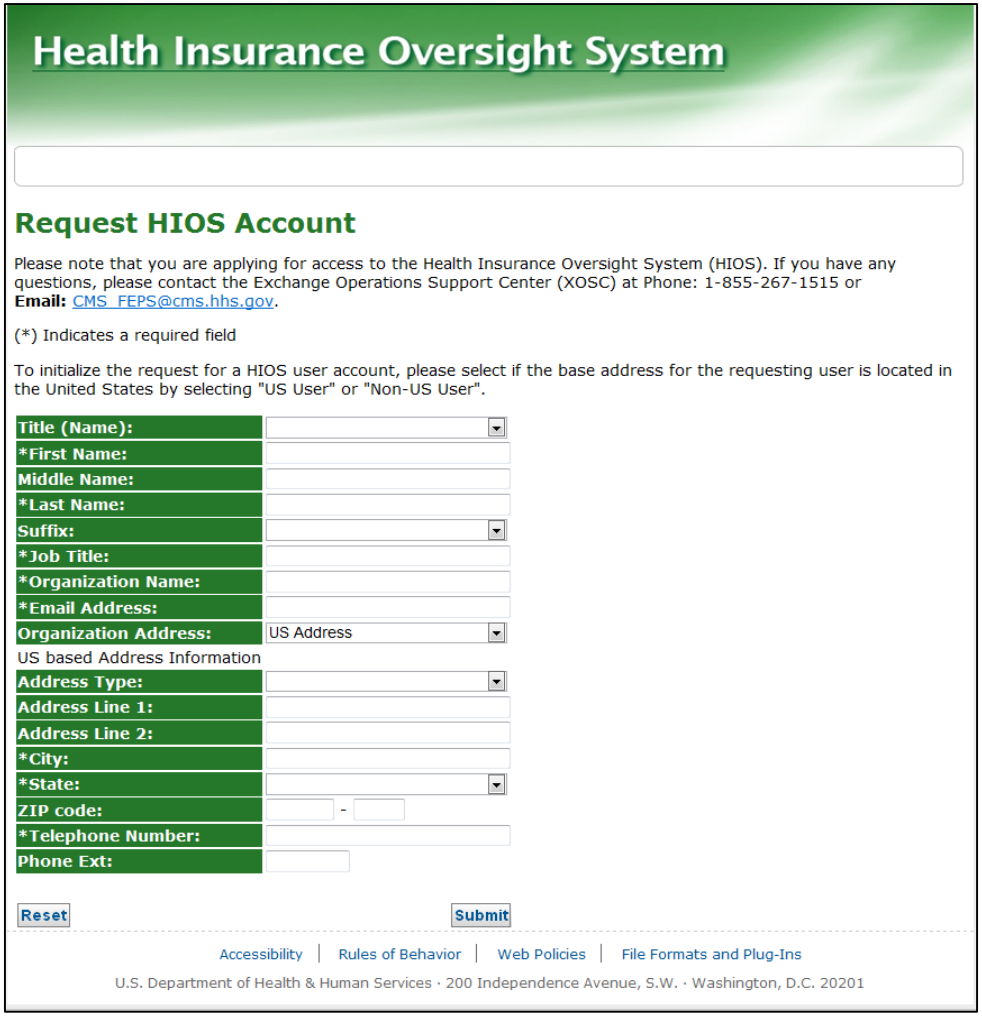
HIOS Account Registration

- Select the "Request Access Now" button
- From the Access Catalog Page, click the "Request Access" button for HIOS
- Select "Request New System Access" link
- Select "HIOS-HIOS Application" from the System Description drop-down menu
- Select "HIOS Issuer" for the Role
- New users will need to click the URL provided on the page



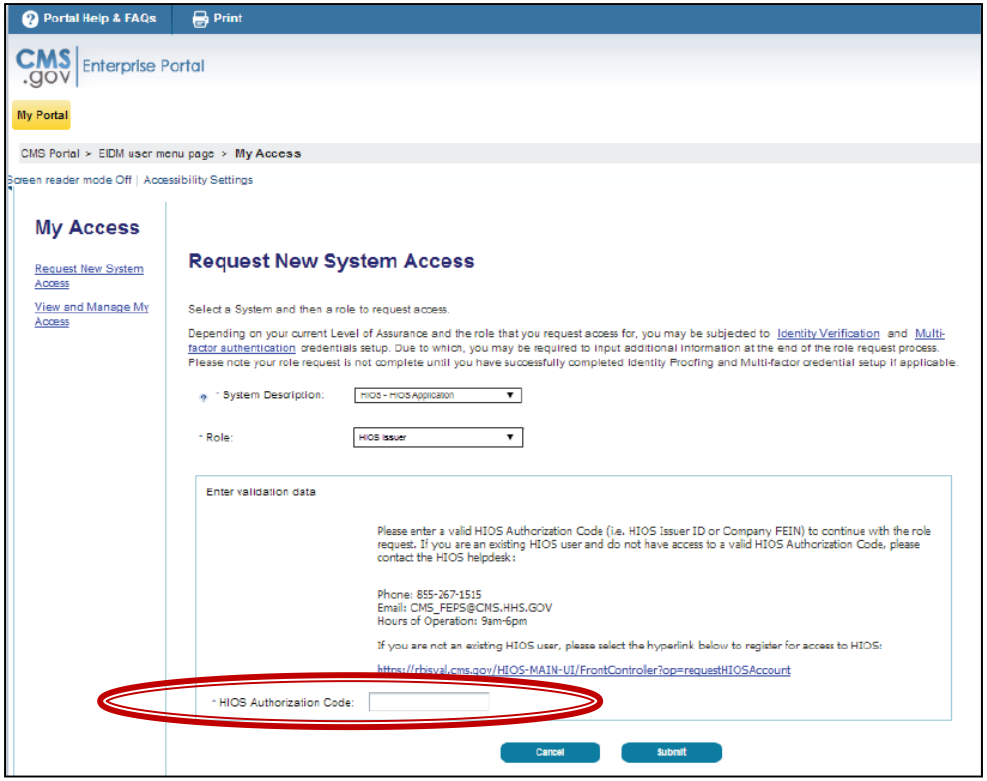
HIOS Account Registration

- New users will navigate to the “Request HIOS Account” Page
- Complete the request form and click the “Submit” button
- Once the account request has been approved, users shall receive an email with a HIOS Authorization Code



HIOS Account Registration

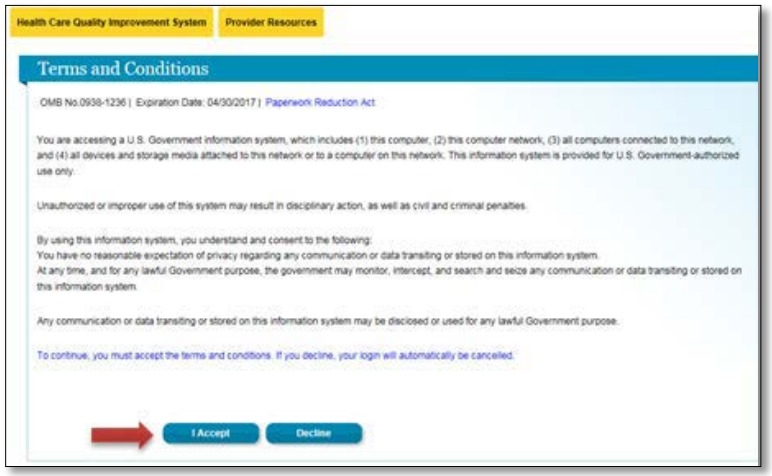
- Users will need to log back in to the CMS Enterprise Portal
- Select “Request New System Access” link
- Select “HIOS-HIOS Application” for the System Description
- Select “HIOS Issuer” for the role
- Enter the HIOS Authorization Code
- Click the “Submit” button and log out of the CMS Enterprise Portal



Access HIOS through CMS Enterprise Portal

Go to https://portal.cms.gov/ and select "Login to CMS Secure Portal" on the CMS Enterprise Portal.

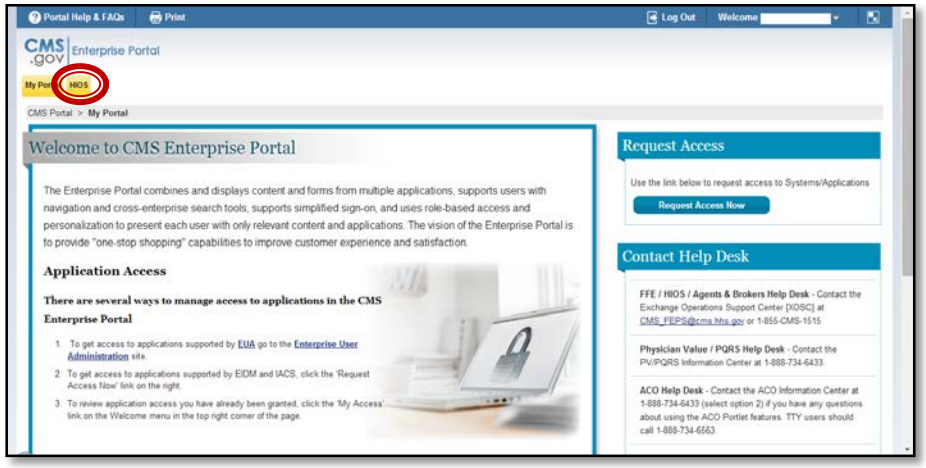
Read the Terms and Conditions and Select "I Accept" to continue

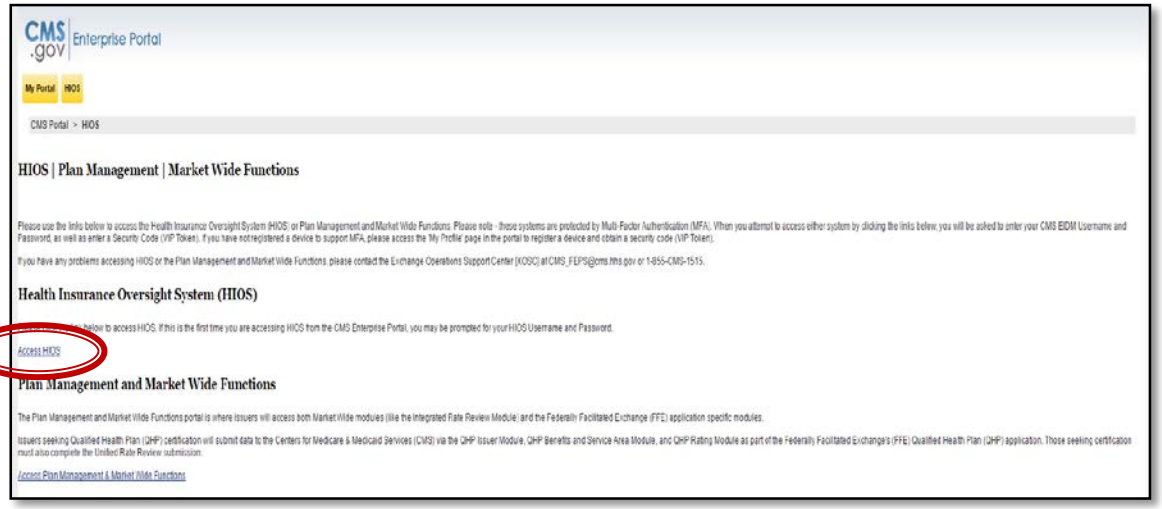


Access HIOS through CMS Enterprise Portal

Users that have registered in EIDM and HIOS will now see a yellow "HIOS" button displayed on the dashboard.

Clicking the "HIOS" button will open the HIOS landing page. On the HIOS | Plan Management | Market Wide Functions landing page, click the "Access HIOS" hyperlink.





Access HIOS through CMS Enterprise Portal

When users click on the Access HIOS link, the HIOS Home Page will open in a new tab.

Overview of New Multi-Factor Authentication (MFA) Process

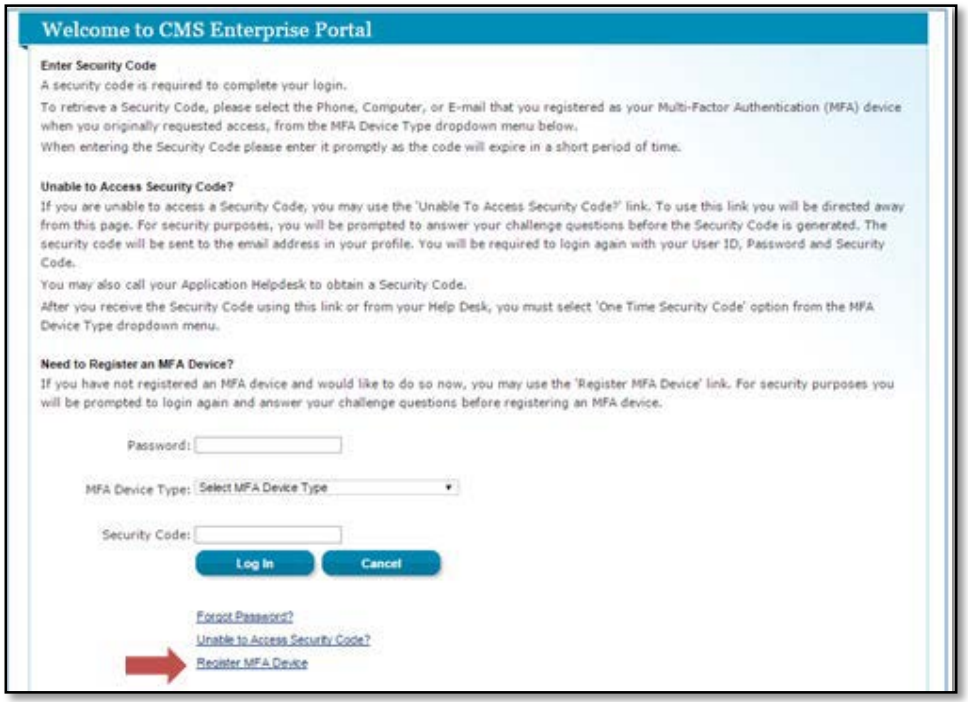
Dates of MFA Implementation

- Multi-factor authentication is currently optional for HIOS users.
- Starting on June 19, 2016, all existing and new HIOS users will be required to register an MFA device.

MFA Registration

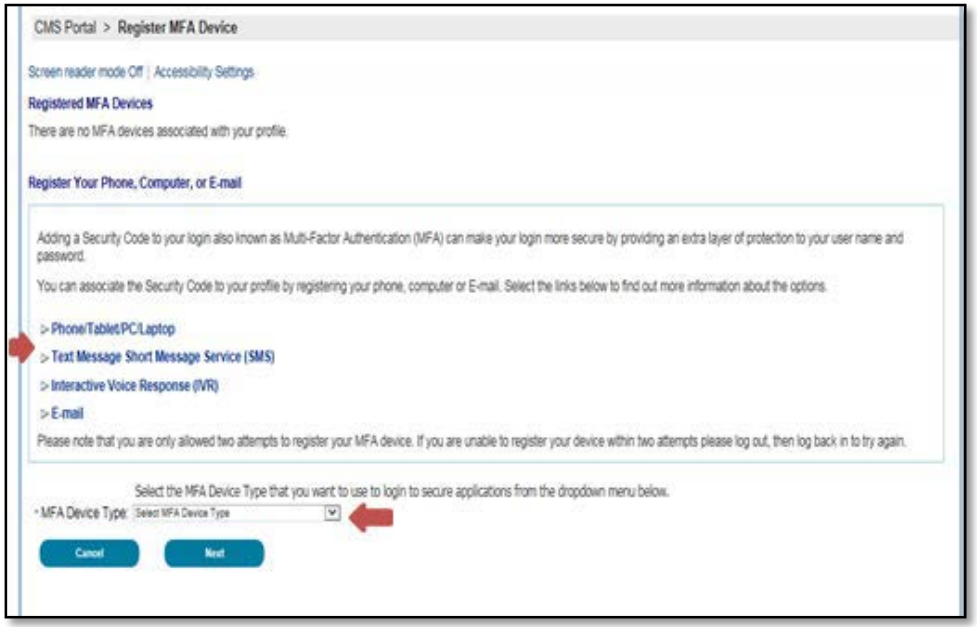
Users will login to the CMS Enterprise Portal and be prompted to enter their EIDM user ID.

The Password and MFA Device type prompt will be displayed. New users will need to select the Register MFA Device link at the bottom to begin the registration process.



MFA Registration

The user will be prompted to enter their EIDM credentials and a set of challenge questions. Once users complete this process, they will be directed to register an MFA device.



Users have the option to select the MFA Device Type:

- Text Message
- E-mail
- Phone/Tablet/PC/Laptop
- Voice Message

MFA Device Options

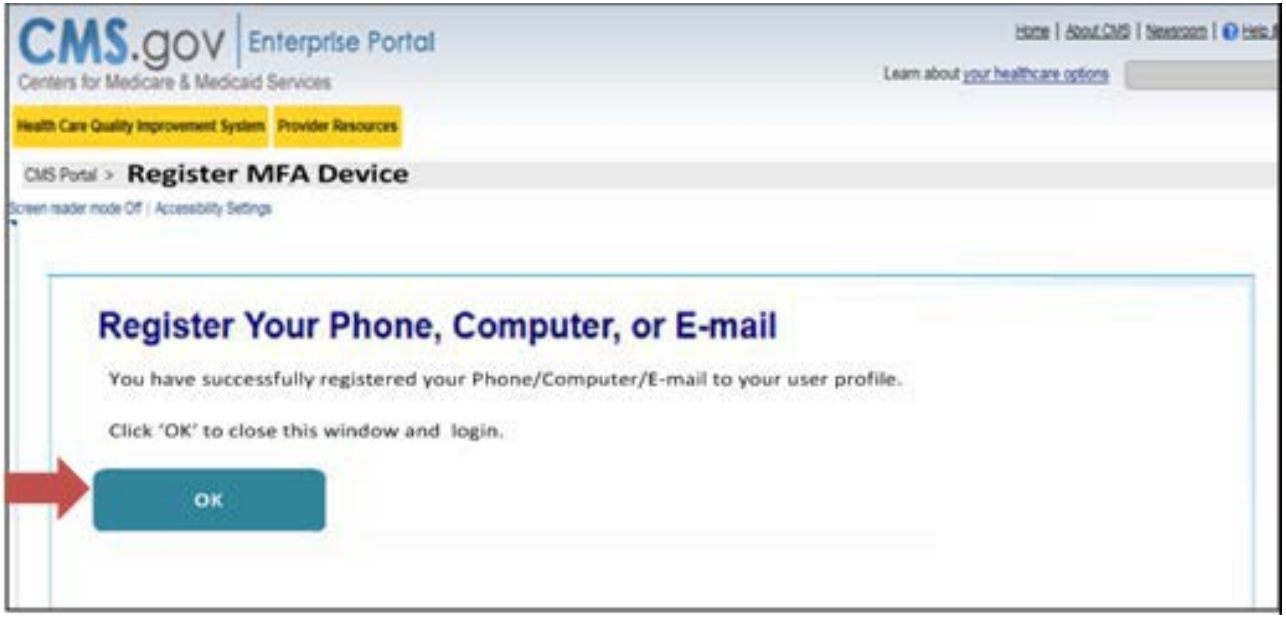
- Text Message – Short Message Service (SMS)
  - User provides a phone number to obtain a security code
- E-mail
  - User provides a valid, accessible e-mail address to receive a security code
- Phone/Tablet/PC/Laptop
  - User downloads the Symantec Verification and Identity Protection (VIP) Access software on their device to generate a security code
- Voice Message – Interactive Voice Response (IVR)
  - User provides a phone number to receive a voice message containing the security code

Note: Users may register up to four (4) MFA devices for their account

MFA Registration

Once users have registered a device, the Multi-Factor Authentication is complete. Users will select the "OK" button to continue to login with MFA.

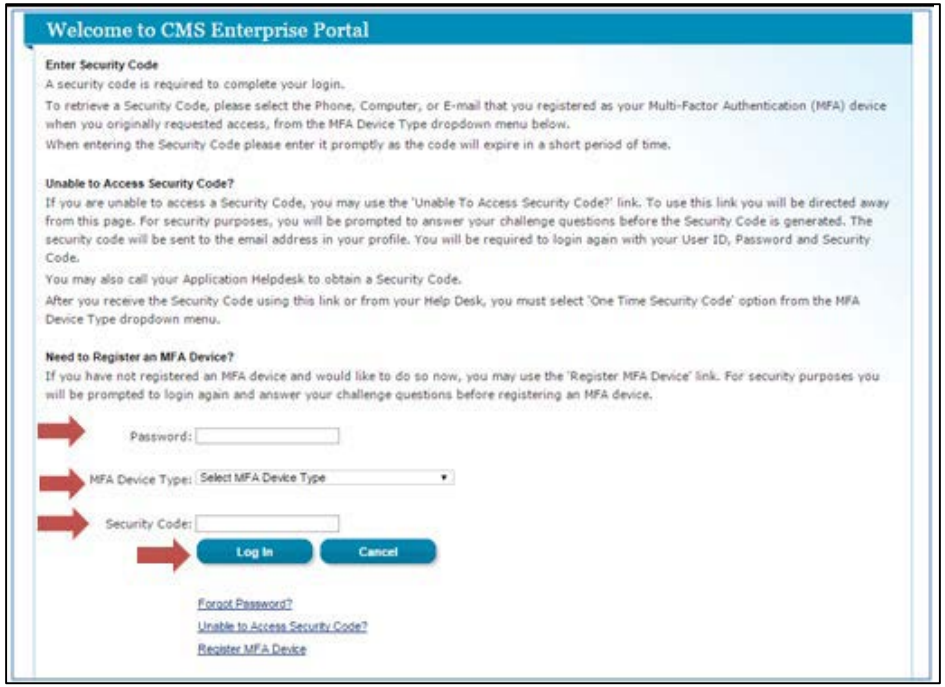
Note: Users will receive an e-mail notification for successfully registering an MFA device.



MFA Registration

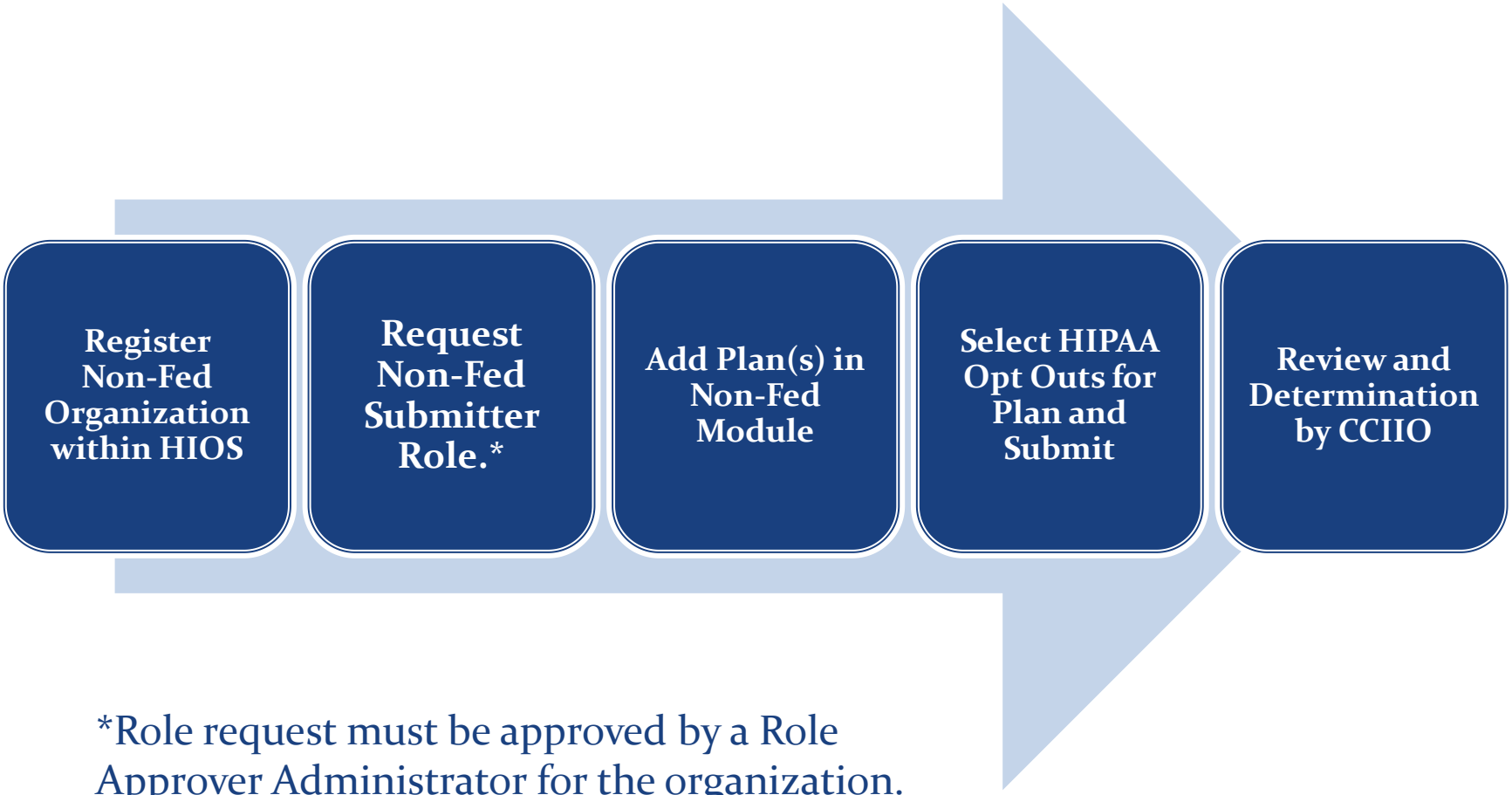
The next time a user tries to login, they will be prompted to enter the security code which shall be sent to the user via the chosen MFA type. Once logged in, users can access HIOS.

Note: This security code will expire in 30 minutes or after it is used successfully for the first time



Overview of Non-Fed Workflow

Overview of Non-Fed Workflow



*Role request must be approved by a Role Approver Administrator for the organization.

Registering the Organization within HIOS

HIOS Organization Registration Process

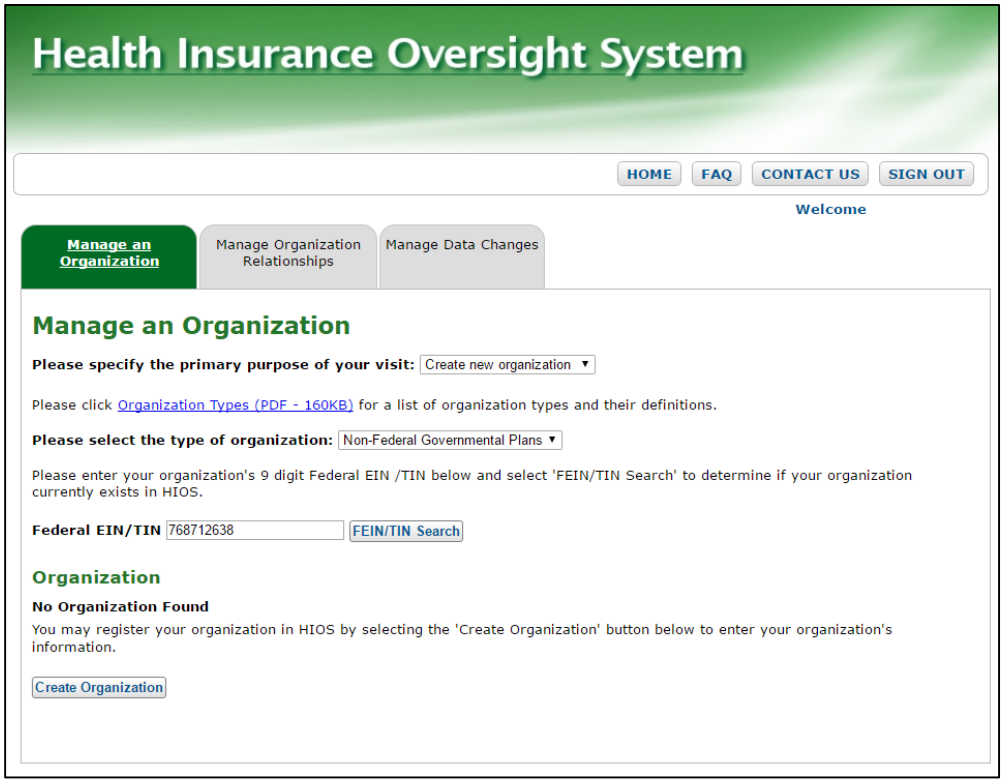
On the HIOS Home page, select the "Manage an Organization" button.

HIOS Organization Registration Process

1. Select “Create new organization” from the first drop-down
2. Select “Non-Federal Governmental Plans” from the organization type drop-down
3. Enter the organization Federal EIN in the textbox and click on the search button

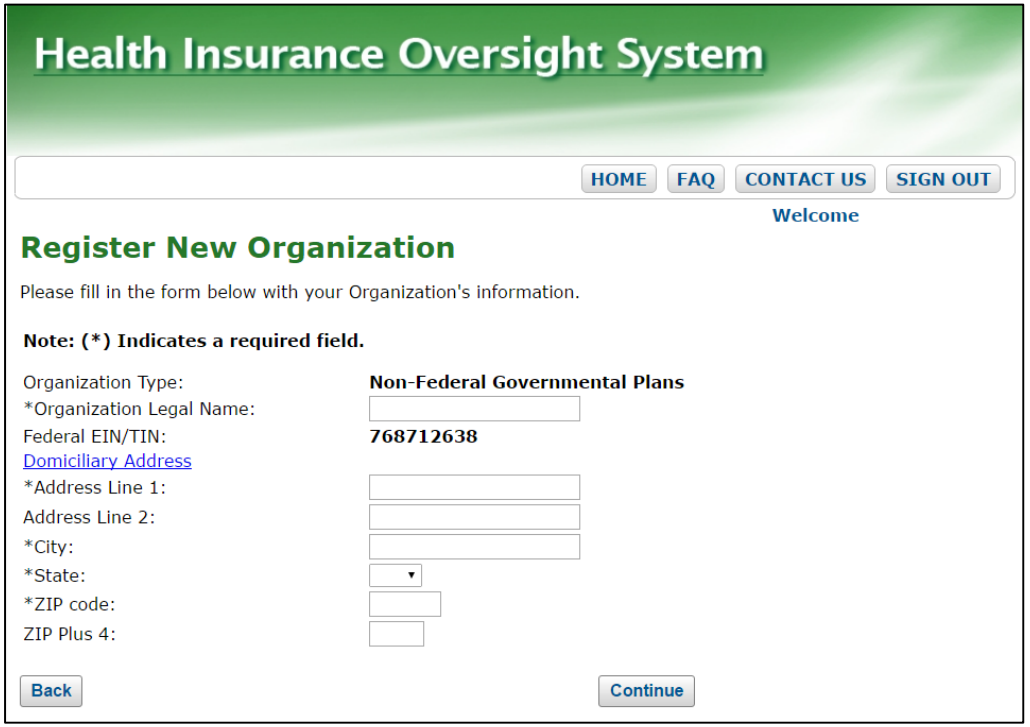
HIOS Organization Registration Process

4. If the organization's Federal EIN is not registered in HIOS, the following message will be displayed:
   - "No Organization Found"
5. Click on the "Create Organization" button



HIOS Organization Registration Process

6. Fill in the required information to register a new Non-Fed organization. An asterisk (*) indicates a required field.
7. Select the "Continue" button to continue entering other organization attributes



HIOS Organization Registration Process

8. Select the Non-Fed Plan Type by checking the appropriate boxes.*
9. Select the "Review/Continue" button

*Please note, only Self Funded Non-Fed Plans will be able to complete their HIPAA Opt Out Information in the Non-Fed Module. An organization can have both Self Funded and Fully Insured attributes selected.

HIOS Organization Registration Process

10. Review the organization information and click on the “Submit” button to request to register the organization.

    A confirmation message will appear once the request has been submitted.

User Role Management

HIOS User Role Request Process

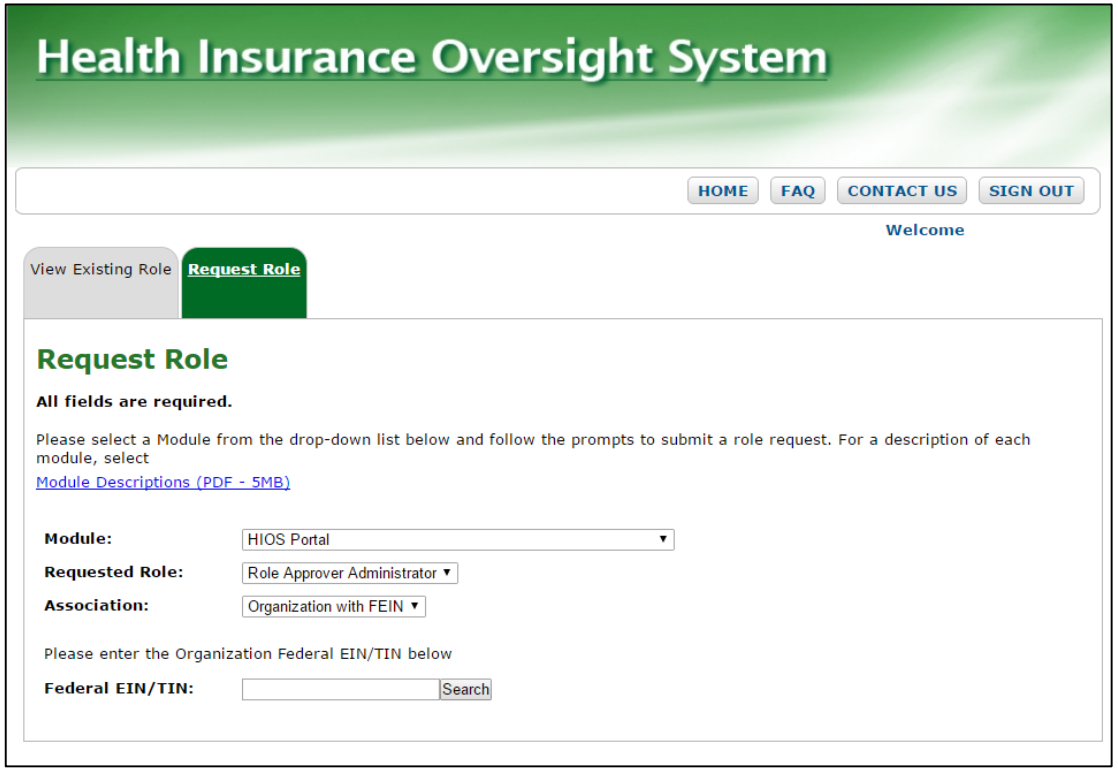
- After the organization has been approved, users will be allowed to request user roles associated to that organization.
- In order to gain access to the Non-Fed module, an organization must have a Role Approver Administrator associated before a user may request the Submitter role.
- The Role Approver Administrator will be responsible for reviewing and approving all Submitter role requests for that organization.

HIOS User Role Request Process

On the HIOS Home page, select the "Role Management" button.

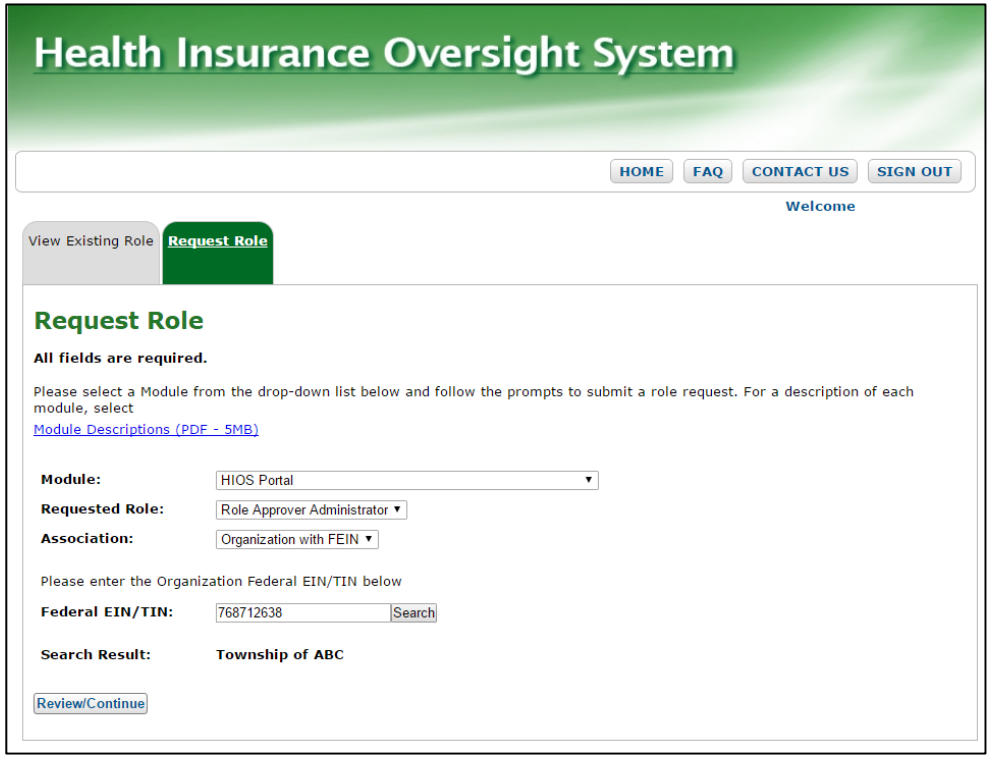
HIOS User Role Request Process

1. Select “Request Role” tab at the top
2. Select “HIOS Portal” from the Module dropdown
3. Select “Role Approver Administrator” from the Request Role dropdown
4. Select “Organization with FEIN” from the Association dropdown



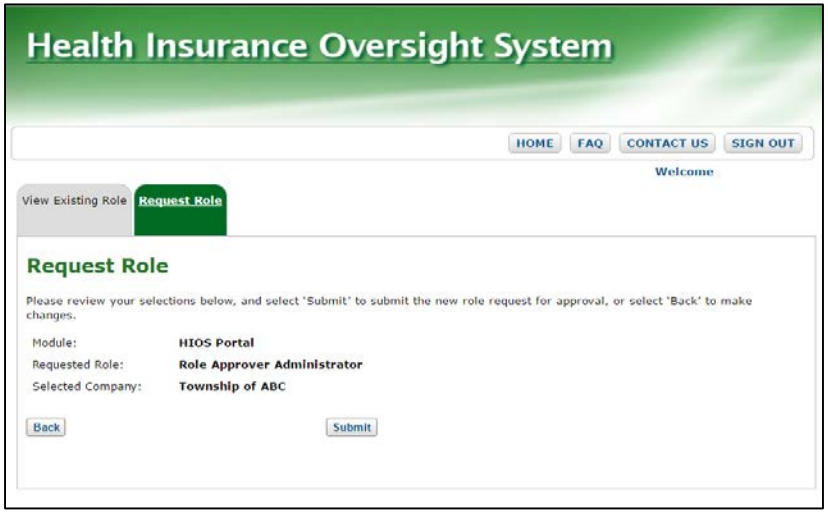
HIOS User Role Request Process

5. Enter the organization's Federal EIN and click on the "Search" button. If the organization's Federal EIN is not registered in HIOS, users will first need to register the organization.
6. Once the organization has been found, click on the "Review/Continue" button

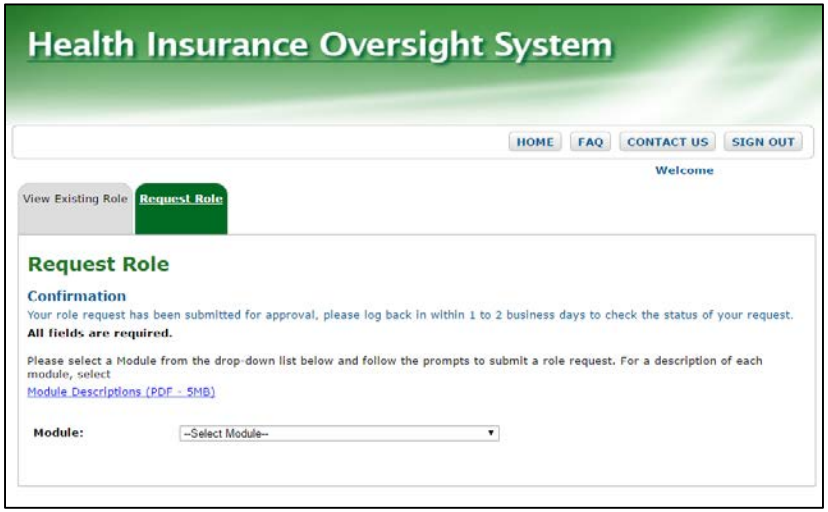


HIOS User Role Request Process

7. Review the role request information and click on the “Submit” button



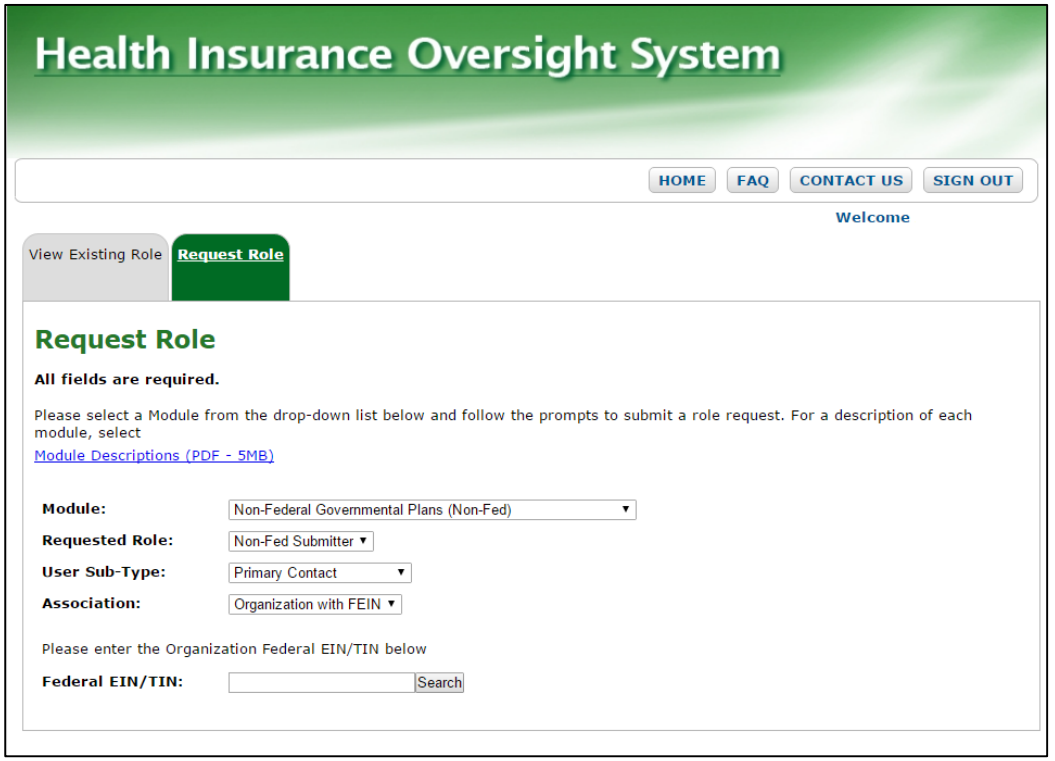
A confirmation message will appear once the request has been submitted.



HIOS User Role Request Process

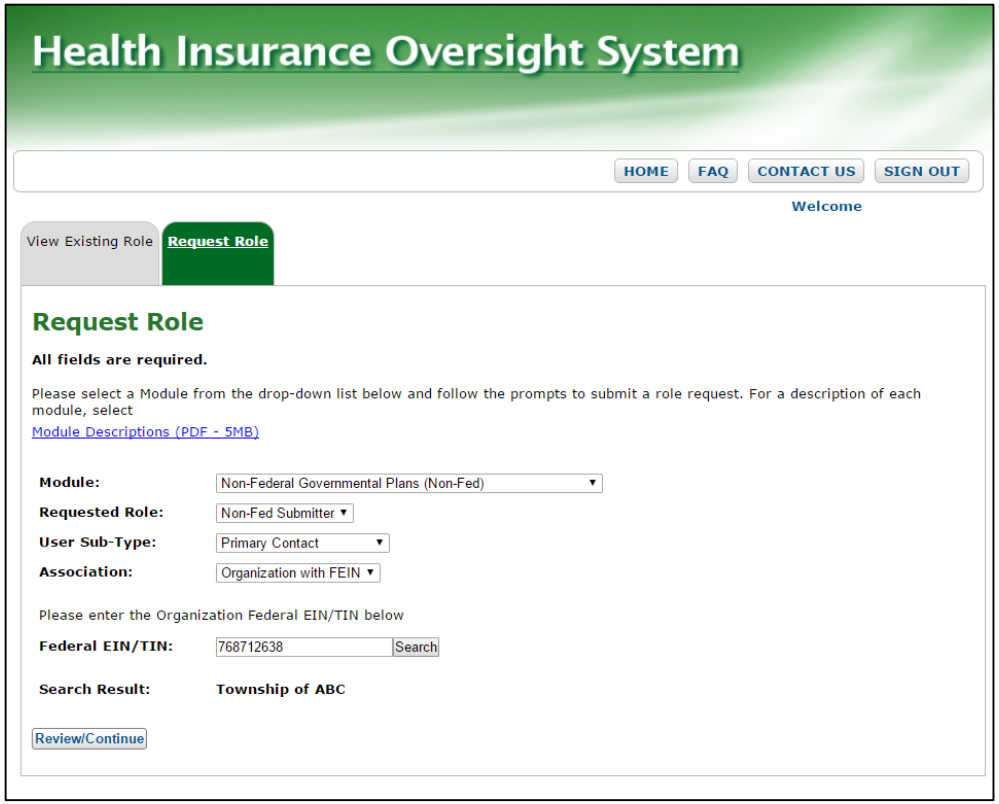
Once an organization has a Role Approver Administrator, users may request the Submitter role.

1. Select "Request Role" tab
2. Select "Non-Federal Governmental Plans (Non-Fed)" as the Module
3. Select "Non-Fed Submitter" as the Requested Role
4. Users may select either "Primary Contact" or "Secondary Contact" as the User Sub-Type
5. Select "Organization with FEIN" as the Association



HIOS User Role Request Process

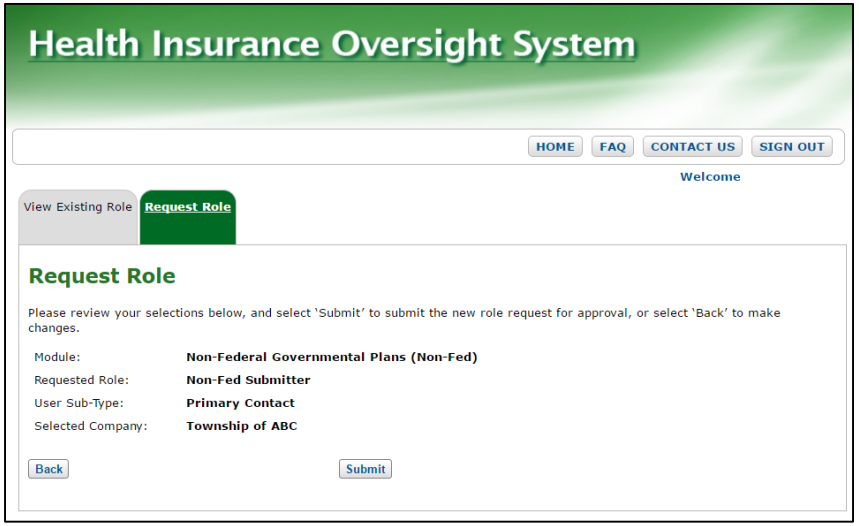
6. Enter the organization's Federal EIN and click on the "Search" button. If the organization's Federal EIN is not registered in HIOS, users will first need to register the organization.
7. Once the organization has been found, click on the "Review/Continue" button

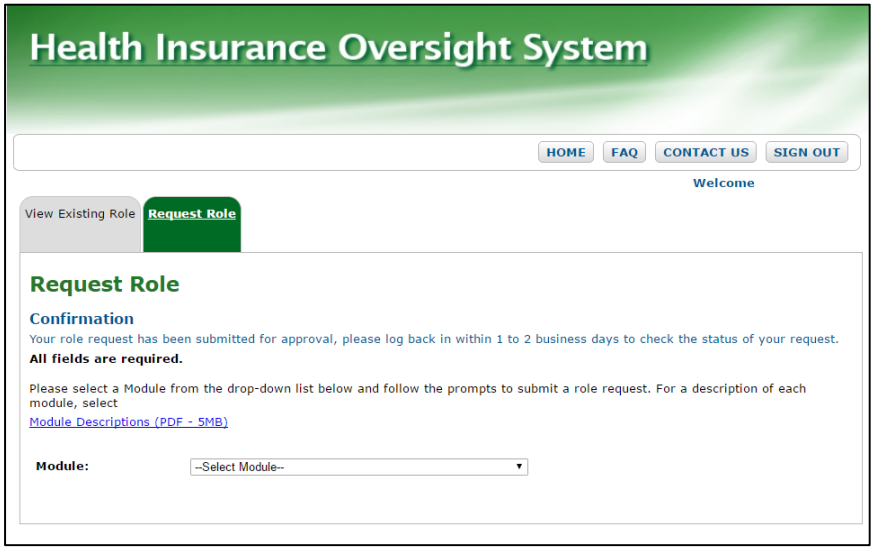


HIOS User Role Request Process

8. Review the role request information and click on the “Submit” button

A confirmation message will appear once the request has been submitted.





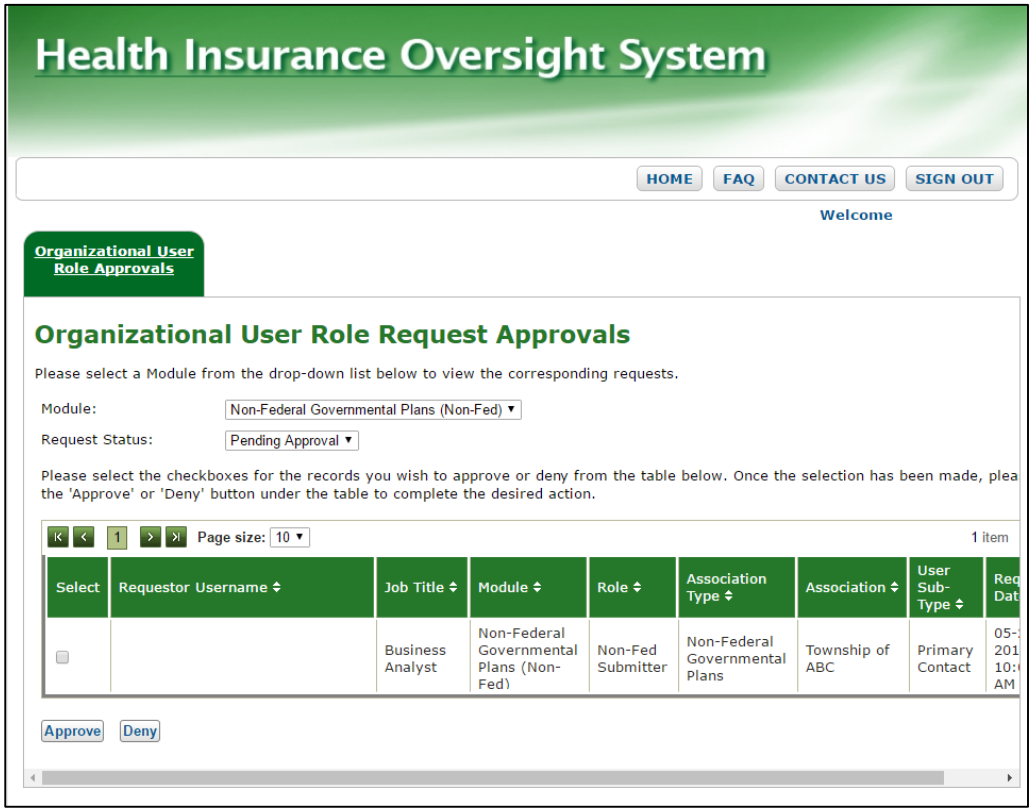
HIOS User Role Request Process

The Role Approver Administrator user of the organization will need to review and approve the Submitter user role requests.

On the HIOS Home page, select the "Role Management" button.

HIOS User Role Request Process

1. Select the "Organizational User Role Approvals" tab
2. Select "Non-Federal Governmental Plans (Non-Fed)" as the module
3. Select "Pending Approval" as the Request Status
4. Check the box under the Select column in the table for the requests that should be approved and click on the "Approve" button



HIOS User Role Request Process

Once the Submitter role request has been approved, the Submitter user will be able to log-in and access the Non-Fed module.

Non-Fed Module Overview

Non-Fed Module Overview

- The Non-Federal Governmental Health Plan module allows Non-Fed plans to register in HIOS. Both self-funded and fully insured plans will be able to provide their plan information, but only plans that are self-funded will be able to provide their HIPAA Opt Out information.

- The Non-Fed module will allow Submitter users to complete the following actions:
  - Provide Plan Information
  - Submit HIPAA Opt Out Information
  - Edit HIPAA Opt Out Information

Manage Plans Workflow

Non-Fed Module Overview

On the HIOS Home page, select the "Non-Federal Governmental Plans (Non-Fed)" button.

Non-Fed Module Overview

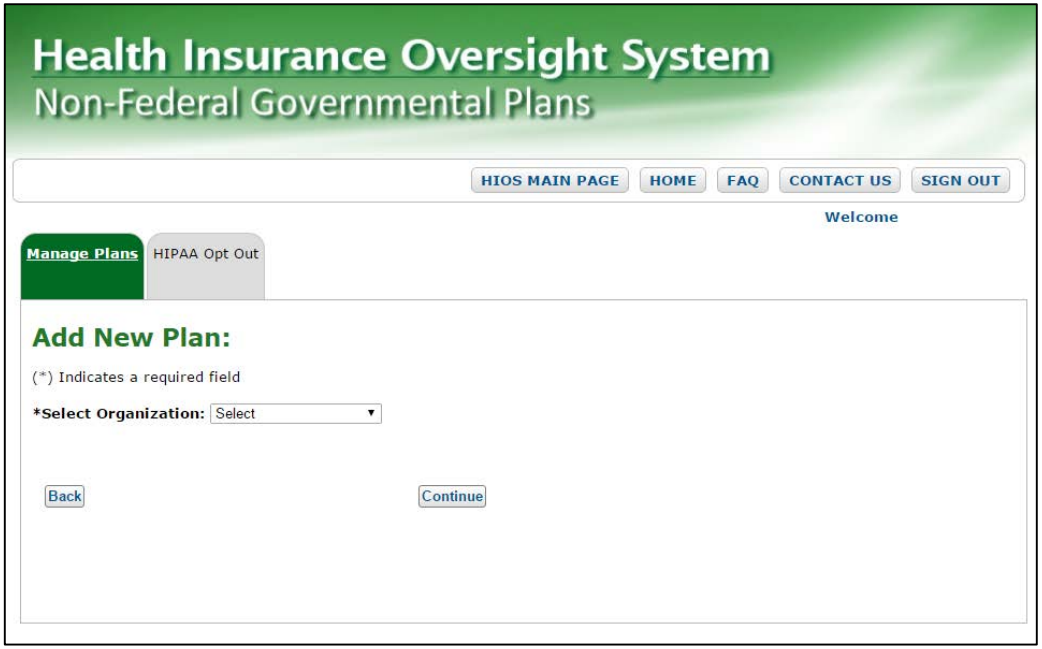
On the Non-Fed module home page, select the "Manage Plans" tab.

Non-Fed Module Overview

1. Click on the "Add New" button to add a new plan

Non-Fed Module Overview

2. Select the appropriate organization from the dropdown. Only organizations that are associated to the Submitter user will appear in the dropdown.
3. Click on the "Continue" button



Non-Fed Module Overview

4. Enter the name of the plan in the free text box at the bottom of the page
5. Click on the "Submit" button

Non-Fed Module Overview

Users will be directed back to the Non-Federal Governmental Plans page, which will now have a confirmation displayed, and see that the plan has been added to the table.

HIPAA Opt-Out Workflow

Non-Fed Module Overview

On the Non-Fed module home page, select the “HIPAA Opt Out” tab.

Non-Fed Module Overview

1. Select an organization from the first dropdown. Only organizations that are associated to the Submitter user will appear in the dropdown.
2. Select a plan from the second dropdown. Only plans that are associated to the selected organization will appear in the dropdown.
3. Click on the "Submit" button

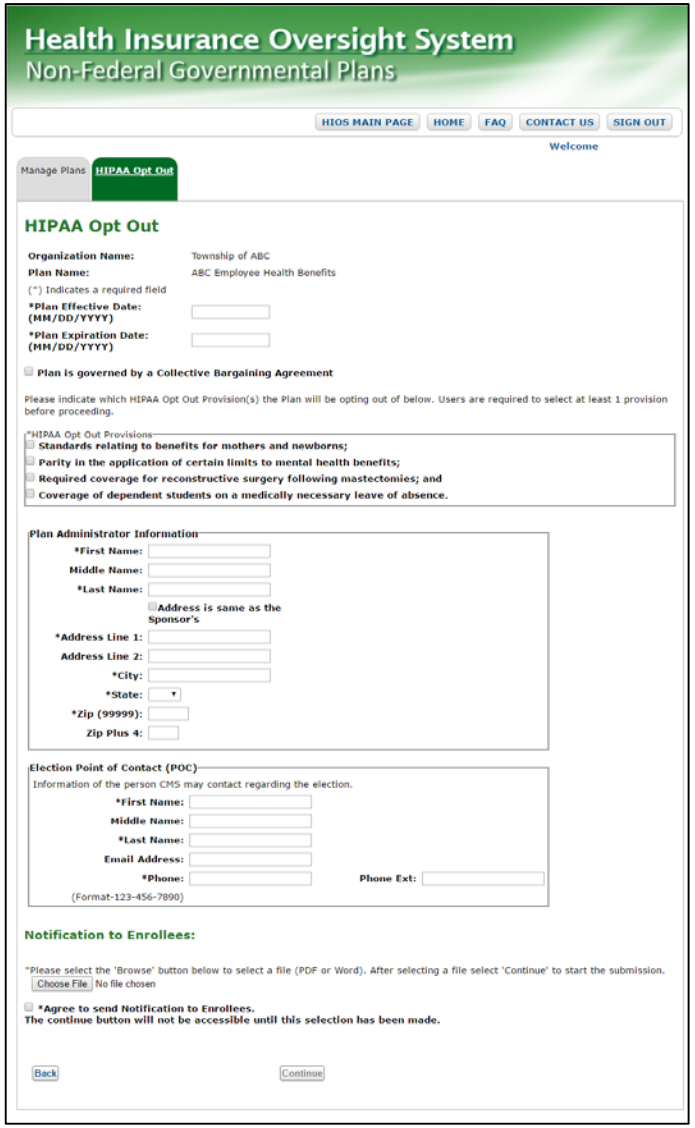
Non-Fed Module Overview

4. Select either the "Renew Election" button or the "New Election" button depending on the scenario of the election

If users have already submitted HIPAA Opt Out information in HIOS, the previously collected information will appear below the instructional text.

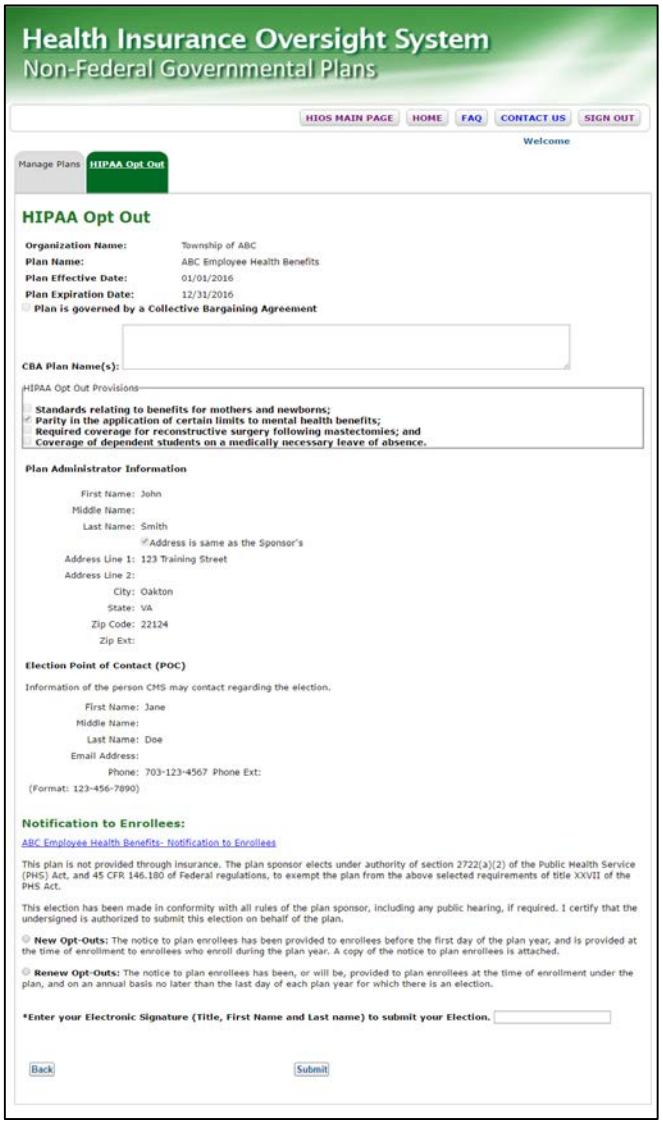
Non-Fed Module Overview

5. Fill in the required fields on the HIPAA Opt Out Page. An asterisk (*) indicates a required field.
6. Once all of the required information has been provided, users will be able to click on the “Continue” button



Non-Fed Module Overview

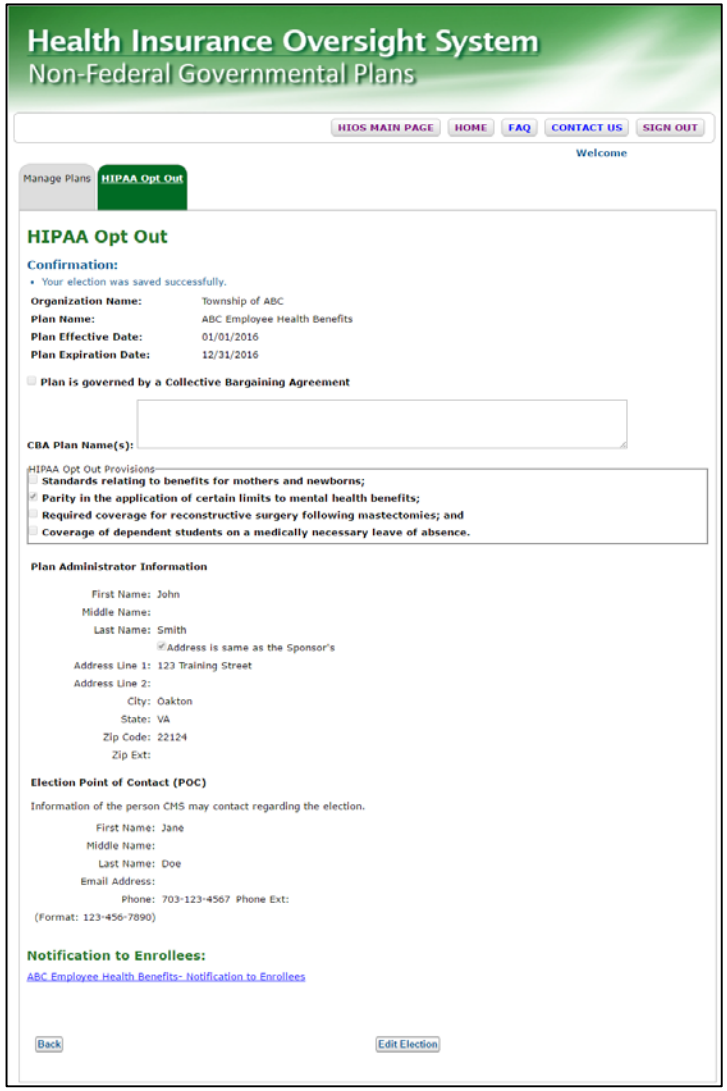
7. Review the information for accuracy
8. Select the appropriate radio button depending on the election type that was initially selected
9. Provide the Title, First and Last Name in the free text box as an electronic signature
10. Click on the “Submit” button



Non-Fed Module Overview

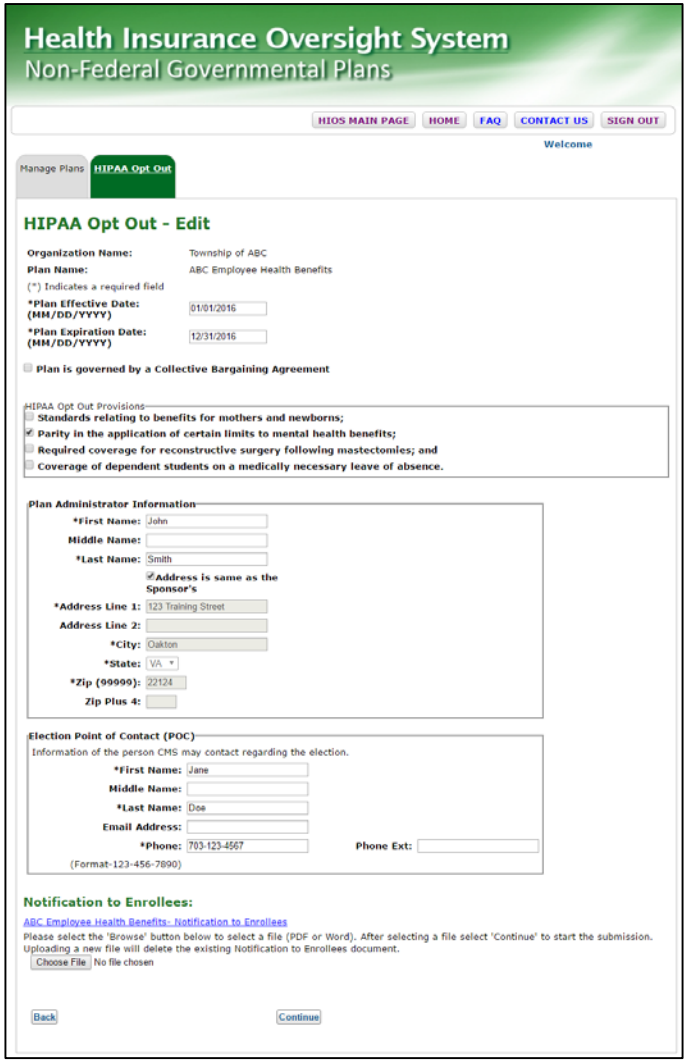
A confirmation message will appear once the user has submitter their opt-out election.

Users will also have the ability to edit the information as needed before it is reviewed by CCIIO.



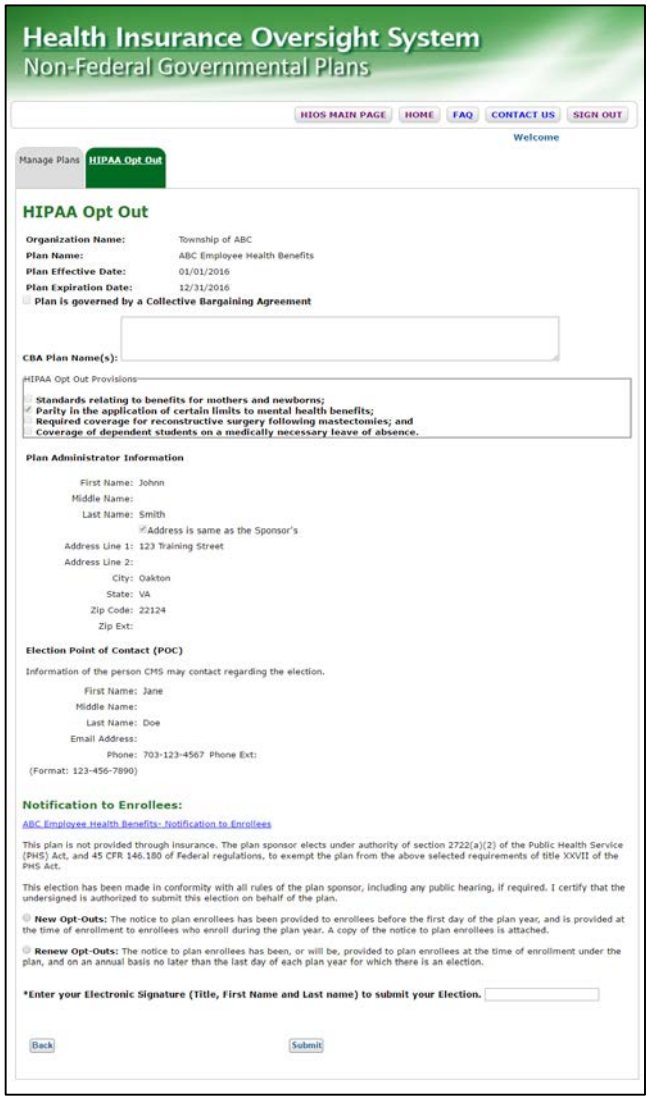
Non-Fed Module Overview

Users can update their information as needed. Once the updates are complete, the user will click on the “Continue” button.



Non-Fed Module Overview

Users will be required to provide their electronic signature again in order to submit the edits.



Reference Documents

- Reference materials are available on the CCIIO website:

  https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources/index.tml#Content

- For additional questions, please contact the Exchange Operations Support Center (XOSC) at CMS_FEPS@cms.hhs.gov or 1-855-267-1515.

Questions