

Updated Email Protocol

The information in this document supersedes information presented in the Prepare to Collect and Collect Data Sections of the *2019 QHP Enrollee Survey Technical Specifications*.

2019 Email Protocol

Based upon stakeholder feedback, including issuers and survey vendors, the QHP Enrollee Survey Project Team has updated the prenotification and reminder emails for the 2019 QHP Enrollee Survey which are available on the [MQI Website](#). Additionally, the Project Team has provided guidance and updated protocols for the following:

- Unsubscribe Link
- Embedding login credentials into URL
- Embedding a "Respond Now" button

Updates and Changes to Protocols

Unsubscribe button/link: Some vendors have requested the addition of an “unsubscribe” link to comply with the CAN-SPAM Act and agreements they may have with email service providers. The CAN-SPAM Act applies to commercial communications, and not government regulatory communication. “The (CAN-SPAM Act) covers all commercial messages, which the law defines as ‘any electronic mail message the primary purpose of which is the commercial advertisement or promotion of a commercial product or service,’ including email that promotes content on commercial websites.” While an unsubscribe button/link is not required for this survey, vendors may choose to include it at the bottom of the email.

- **What happens when an enrollee/respondent clicks on the unsubscribe link?**
 - Enrollees/respondents who click the link will be unsubscribed from email communications but will continue to receive mail and telephone follow up until a final disposition code is assigned or the survey protocol ends.
 - If an enrollee replies to the email asking to be removed from future contact, and the email is successfully received by the vendor (i.e., it is a monitored email inbox), then the enrollee is to be placed on the Do Not Survey list and removed from future email, mail, and telephone follow up.

Embedding login credentials into URL: While both the email and mail prenotification letters currently require the use of login credentials, the Centers for Medicare & Medicaid Services (CMS) is amending the requirements for the email prenotification and reminder emails to the following:

- To make a more seamless internet survey experience, vendors will embed the enrollee’s login credentials into a unique URL.
 - The enrollee will automatically be “logged” in to the Internet survey without having to enter a user name or password once they click on the embedded hyperlink provided in the email.
- Respondents must be matched one-to-one with the sampled enrollee (i.e., a unique identifier is embedded in the survey hyperlink).

- The hyperlink must direct the enrollee to a landing page that allows the enrollee to select whether to take the survey in English or Spanish.
- The same unique hyperlink can be accessed until the email survey period closes; the enrollee will automatically be taken to where they left off.
- Only one survey may be completed by a respondent.
 - Once the Internet survey has been completed by a unique respondent the hyperlink will take them to a page thanking them for completing the survey (i.e., the last page of the Internet survey).
- Respondent confidentiality is stringently protected.

Embedding the hyperlink in a button with “Respond Now” (or similar text): CMS understands that the use of a “Respond Now” or “Click here to take the survey” button will provide enrollees with a simple visual to aid in taking the survey.

- Vendors can use a button with the enrollees’ unique hyperlink embedded. However, vendors must also provide the full unique URL.
- The hyperlink must direct the enrollee to a landing page that allows the enrollee to select whether to take the survey in English or Spanish.
- All requirements for the embedding of credentials into a unique URL (the previous section), must be adhered to.

Streamlining the email notifications when language preference indicators are not available: CMS would like to clarify and amend the 2019 QHP Enrollee Survey Technical Specifications regarding the protocols and content of the email notifications.

- CMS recommends vendors send the English email template, with the Spanish and Chinese survey instructions at the bottom if language preference indicators are not available. However, all survey URL links must direct respondents to a landing page that allows the enrollee to select whether to take the Internet survey in English or Spanish.

Request to not include the customer service phone number in the email notifications: CMS requires vendors to provide the full phone number with days/time and time zones in case enrollees want to confirm the legitimacy of the survey. This aligns with the requirements of the mail letters in all languages.

Request to withhold enrollee’s email addresses when they have “do not survey” preferences with the issuer: To align with the phone and mail protocols of the QHP Enrollee Survey, issuers must include email addresses in the sample frame for all enrollees who have an email address on file. Vendors may not exclude sampled enrollees from the survey based on an issuers’ internal do not contact list. (See the Sampling section of the 2019 QHP Enrollee Survey Technical Specifications)

Issuer concerns regarding trust in email communications: CMS understands that issuers have worked hard to build and keep enrollee trust in electronic communication. Please remember that the CAN-SPAM Act applies to commercial emails and not government regulatory communications. To help assure enrollees that communication is legitimate and that their email

address is being used appropriately, CMS has amended the email notification/cover letters to begin with the following:

- This email is official communication on behalf of [issuer name fill]. The contents of this email and the links provided are for a survey required by the Affordable Care Act (ACA).¹ and managed by the Centers for Medicare and Medicaid Services (CMS).² Your health plan *did not* sell your email address. In addition to this email, you should receive a notification letter to your home address inviting you to take the internet survey. If you do not complete the survey over the internet, you should receive the survey in the mail. Your insurance company can verify that the survey is legitimate, however they have contracted with [vendor name fill] to administer the survey.
 - Footnote 1: [Section 1311\(c\)\(4\) of the Affordable Care Act](#) – ENROLLEE SATISFACTION SYSTEM.—The Secretary shall develop an enrollee satisfaction survey system that would evaluate the level of enrollee satisfaction with qualified health plans offered through an Exchange, for each such qualified health plan that had more than 500 enrollees in the previous year. The Exchange shall include enrollee satisfaction information in the information provided to individuals and employers through the Internet portal established under paragraph (5) in a manner that allows individuals to easily compare enrollee satisfaction levels between comparable plans.
 - [Hyperlink to be embedded with the following URL:](#)
https://www.ssa.gov/OP_Home/comp2/F111-148.html
 - Footnote 2: [CMS Marketplace Quality Initiatives website](#) and [QHP Enrollee Survey Materials](#).
 - [Hyperlink to be embedded with the following URL \(URL MQI website\):](#)
<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/ACA-MQI/Consumer-Experience-Surveys/Surveys-page.html>
 - [Hyperlink to be embedded with the following URL \(URL QHP Enrollee Survey Materials\):](#) <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityInitiativesGenInfo/ACA-MQI/Consumer-Experience-Surveys/Survey-Materials-SubPage.html>

Issuers communicate through a secure messaging system, will there be an issue with trust and legitimacy? Enrollees will receive both a prenotification email and letter sent to their home address. CMS has revised the content of the prenotification and reminder emails to reflect updates requested by issuers and vendors.

Language preference indicator: If language preference indicator information is not available, vendors are required to program the emails in English only with the associated Spanish and Chinese (if applicable) taglines. This reflects the approach used by vendors for the mail survey when language preference indicators are not available.