District of Columbia Level Two Establishment Grant: Work Plan

Milestone / Deliverables	Start Date	End Date	2011				2012				2013				2014			
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Legal Authority and Governance																		
Obtain enabling authority to operate an Affordable Insurance Exchange, including a Small Business Health Options Program (SHOP)	Jun 2011	Jan 2012		x	x	x	x											
Evaluate Exchange governance structure options	Jun 2011	Oct 2011		x	x	x												
Pass legislation authorizing the creation and operation of the District's Exchange, including duties and responsibilities of the Exchange	Sep 2011	Jan 2012			x	x	x											
Establish an Exchange Board and governance structure	Oct 2011	Jul 2012				x	x	x	x									
Mayor nominates candidates and Council confirms Exchange governance board	Oct 2011	Jul 2012				x	x	x	x									
Conduct Board orientation & establish meeting schedule	Jan 2012	Jul 2012					x	x	x									
Hire an Executive Director & other staff to oversee operations of the Exchange	Feb 2012	Sep 2012					x	x	x									
Establish Charter and Bylaws consistent with State and Federal requirements including public accountability, transparency, and conflict of interest	Feb 2012	Mar 2012					x											
Continue to review HHS proposed rules and submit all relevant comments	Jan 2011	Ongoing	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Evaluate the need for additional legislation and draft necessary legislation if needed	Mar 2010	Ongoing	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Establish Policies & Procedures for the Exchange with input from relevant DC agencies	Mar 2012	Ongoing					x	x	x	x	x	x	x	x	x	x	x	x
Provide briefing for Council on potential legislation as needed	Nov 2012	Ongoing								x	x	x	x	x	x	x	x	x
Consumer and Stakeholder Engagement and Support																		
Develop and implement a stakeholder consultation plan	Apr 2011	Ongoing		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Develop stakeholder engagement plan	Apr 2011	Jun 2011		x														
Establish & convene stakeholder groups including insurance carriers, providers, consumer advocates, employers, and brokers	Nov 2010	Apr 2011	x	x														
Continue regular stakeholder meetings as part of our planning & design processes, including regular Health Reform Implementation Committee Meetings	Nov 2010	Dec 2014	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Continue to present about Exchange planning & implementation at conferences & events	Nov 2010	Dec 2014	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Post meeting materials and agendas on the Exchange Website	Jan 2011	Dec 2014	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Solicit public comment at Exchange Board meetings	Jul 2012	Dec 2014							x	x	x	x	x	x	x	x	x	x
Publicize Exchange-related meetings and information through the monthly e-newsletter	Jun 2012	Dec 2014						x	x	x	x	x	x	x	x	x	x	x
Provide culturally and linguistically appropriate outreach and educational materials to the public	Jun 2011	Ongoing		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Develop requirements to ensure information can be provided in multiple languages on the Exchange website	Mar 2012	Apr 2012					x	x										
Continue outreach to culturally diverse populations and provide translation services at public meetings	Jun 2011	Ongoing		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x

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			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Develop and implement an outreach plan for populations including: individuals, entities with experience in facilitating enrollment such as agents/brokers, small businesses and their employees, employer groups, health care providers, community-based organizations, advocates for hard-to-reach populations, and other relevant populations	Apr 2011	Dec 2014		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Procure a vendor for marketing, outreach, and education campaign	Mar 2013	May 2013									x	x						
Convene focus groups to test Exchange branding and communication strategy	Feb 2013	Jun 2013									x	x						
Perform environmental scan to asses outreach/education needs so that the Exchange can target outreach to vulnerable populations and conduct demographic communication	Oct 2012	Mar 2012								x	x							
Develop branding and logos	Nov 2012	Mar 2013									x							
Design a media strategy	Nov 2012	Jun 2013									x	x						
Develop a toolkit and design marketing campaign	Nov 2012	Jul 2013										x	x					
Develop outreach and education plan	Nov 2012	Jul 2013										x	x					
Hire communications and outreach staff	Mar 2013	Jul 2013										x	x					
Launch outreach/education campaign	Feb 2013	Jan 2014											x	x	x			
Identify ongoing outreach and education needs strategy	Mar 2014	Ongoing													x	x	x	x
Provide ongoing outreach and education services	Mar 2014	Ongoing													x	x	x	x
Provide for the operation of a toll-free telephone hotline (call center) to respond to requests for assistance from the public, including individuals, employers, and employees, at no cost to the caller as specified by 45 CFR 155.205(a)	Sep 2013	Dec 2014											x	x	x	x	x	x
Analyze current consumer assistance programs/call centers in the District to determine current capacity and level of services	Jan 2012	Aug 2012					x	x	x									
Develop plan for integrated call center with Medicaid, Human Services, Insurance, and Ombudsman	Jan 2012	Dec 2012					x	x	x	x								
Develop business process flows for customer experiences	Jan 2012	Sep 2012					x	x	x									
Develop criteria for RFP to select a vendor to operate call center	Nov 2012	Mar 2013									x							
Release Operation RFP for bids	Dec 2012	Mar 2012									x							
Complete call center procurement process and select a vendor to operate the call center	Mar 2013	Ongoing										x	x	x	x	x	x	x
Integrate call center IT infrastructure with DCAS to ensure access to data	Jan 2013	Sep 2013										x	x					
Develop a call center customer service representative protocols and scripts to respond to likely requests	Oct 2012	May 2013										x						
Develop protocols for accommodating the hearing impaired and those with other disabilities and foreign language and translation services	Sep 2012	Oct 2013										x	x	x				

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			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Train call center representatives on eligibility verification and enrollment processes	Apr 2013	Aug 2013										x	x					
Launch call center functionality and publicize 1-800 number	Aug 2013	Aug 2013											x					
Ongoing customer service performance monitoring and vendor oversight	Aug 2013	Ongoing											x	x	x	x	x	x
Establish and maintain an up-to-date Internet Web site that provides timely and accessible information on QHPs available through the Exchange, Insurance Affordability Programs, and SHOP	Oct 2012	Ongoing							x	x	x	x	x	x	x	x	x	x
Develop systems and program operations requirements: Requirements related to online comparison of QHP, Requirements related to online application and selection of QHPs, Premium tax credit and cost-sharing reduction calculator functionality, Requests for assistance, Linkages to other State health subsidy programs, and other health and human services programs as appropriate	Jan 2011	Nov 2012	x	x	x	x	x	x	x	x								
Develop a system to ensure system development and operational development are coordinated	Dec 2011	Mar 2012				x	x											
Evaluate best practices to ensure website usability	Oct 2012	Mar 2013								x	x							
Create training for web functionality to be used by navigators, brokers, and other stakeholders	Jan 2013	Mar 2013									x							
Use outreach and education consumer group to test information to be posted on informational website	Jan 2013	Apr 2013									x	x						
Present website/calculator to Board	Mar 2013	May 2013										x						
Incorporate all feedback into website development	Mar 2013	May 2013										x						
Launch information website	Jun 2013	Jun 2013								x	x	x						
Ensure website connectivity at Navigator offices	Jul 2013	Sep 2013											x					
Launch fully functioning online comparison tool with pricing information and online enrollment functionality	Sep 2013	Sep 2013											x					
Continually update website based on consumer testing and stakeholder feedback	Sep 2013	Ongoing											x	x	x	x	x	x
Establish and operate a Navigator/In-person Assistor (IPA) program, including the development of training and conflict of interest standards, that adheres to required privacy and security standards	Apr 2012	Ongoing						x	x	x	x	x	x	x	x	x	x	x
Conduct analysis of Navigator Program options in the District	Apr 2012	Jul 2012						x	x									
Convene stakeholders including consumer advocates, providers, and producers to obtain input on Navigator	Nov 2011	Dec 2013				x	x	x	x	x	x	x	x	x				
Determine financial model for Navigator program including grant fund size and revenue stream to support	Aug 2012	Mar 2013									x							
Award contract(s) for services to assist with the design and implement the Navigator program	Dec 2012	Mar 2013									x							
Develop Exchange oversight and quality control process for Navigator program including feedback mechanism for consumer complaints	Dec 2012	Apr 2013									x	x						
Hire or designate Exchange staff responsible for Navigator program.	Mar 2013	Apr 2013									x	x						
Establish criteria for Navigator Program and create a list of potential organization that could serve as navigators	Dec 2012	Jan 2013									x							
Develop process for the selection/designation of Navigators	Dec 2012	Mar 2013								x	x							
Begin selection/designation process	Feb 2013	Mar 2013									x							

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Milestone / Deliverables	Start Date	End Date	2011				2012				2013				2014			
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Determine Navigator grantee organizations and award grants (funded from the operational funds of the Exchange)	Apr 2013	Apr 2013										x						
Develop Navigator training curriculum and certification process	Dec 2012	Apr 2013										x						
Begin Navigator/IPA program	Jul 2013	Jul 2013											x					
Require quarterly reporting from Navigators on performance	Jul 2013	Ongoing											x	x	x	x	x	x
Begin selection process for 2015 Navigators	Sep 2014	Sep 2014															x	
Define the role of agents and brokers, including required evidence of licensure and training	Aug 2012	Sep 2012							x									
Conduct analysis of broker options for the Exchange	Apr 2012	Mar 2013							x	x	x							
Engage stakeholders on broker options for the Exchange through focus groups and public meetings	Apr 2012	Sep 2012							x	x	x							
Develop recommendations on broker role and compensation	Sep 2012	Mar 2013									x							
Present broker recommendations to the Board	Oct 2012	Mar 2013									x							
Eligibility and Enrollment																		
Develop and use an HHS-approved single, streamlined application for the individual market to determine eligibility and collect information that is necessary for enrollment in a QHP for the individual market and for insurance affordability programs	Jun 2012	Jan 2013					x	x	x	x	x							
Evaluate the HHS single streamlined application to determine if it will meet the needs of the District	Jun 2012	Jan 2013							x	x	x							
Identify any necessary changes to the HHS application	Oct 2012	Feb 2013								x	x							
Test any District changes to the HHS application with consumers (if necessary)	Nov 2012	Mar 2013									x							
Submit District application to HHS for approval (if necessary)	Jan 2012	Apr 2013										x						
Develop and use an HHS-approved application for SHOP	Nov 2012	Ongoing								x	x	x	x	x	x	x	x	x
Evaluate the HHS SHOP application to determine if it will meet the needs of the District (District anticipates using HHS application)	Jun 2012	Mar 2013							x	x	x							
Submit District application to HHS for approval (if necessary)	Dec 2012	May 2013										x						
Develop and implement a coordination strategy with other agencies administering Insurance Affordability Programs and the SHOP that enables the Exchange to carry out the eligibility and enrollment activities	Sep 2011	Ongoing			x	x	x	x	x	x	x	x	x	x	x	x	x	x
Form workgroups with DISB, DHCF and DHS staff to develop business rules surrounding seamless eligibility	Jan 2011	Ongoing	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Work with eligibility team to facilitate building of business rules for eligibility for Medicaid and the Exchange	Jan 2011	Dec 2012	x	x	x	x	x	x	x	x								
As part of IT systems plan, build joint business requirements for eligibility system	Jan 2011	Dec 2012	x	x	x	x	x	x	x	x								
Brief Board on policy recommendation regarding eligibility determinations	Aug 2012	Dec 2012							x	x								
Accept and process applications, updates, and responses to redeterminations from applicants and enrollees, including applicants and enrollees who have disabilities or limited English proficiency, through all required channels, including in-person, online, mail, and phone	Oct 2013	Ongoing												x	x	x	x	x
Develop business process flows for the processing of applications and updates	Mar 2012	Dec 2012					x	x	x	x								

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			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Train eligibility staff in new processes for application processing	Jan 2013	Aug 2013									x	x	x					
Workshop LEP/disability applications with staff and focus groups	Jan 2013	Aug 2013									x	x	x					
Develop and implement capacity to send notices, including notices in alternate formats and multiple languages; conduct periodic data matching; and conduct annual redeterminations and process responses in-person, online, via mail, and over the phone pursuant to 45 CFR 155, subpart D.	Apr 2013	Ongoing										x	x	x	x	x	x	x
Review Federal requirements for notices	Mar 2012	Ongoing						x	x	x	x	x	x	x	x	x	x	x
Survey existing notices for Medicaid and other health programs	Jul 2012	Dec 2012							x	x								
Develop notice content that is accessible to consumers of varying education levels and languages	Oct 2012	Mar 2013									x							
Receive input from outreach/education stakeholder group on draft notices	Jan 2013	Mar 2013									x							
Finalize notices including stakeholder review, testing, translation of content, etc.	Apr 2013	May 2013										x						
Conduct verifications pursuant to 45 CFR 155, subpart D, and connect to data sources, such as the Federal Data Services Hub, and other sources as needed	Oct 2013	Ongoing												x	x	x	x	x
Examine state and federal laws and regulations to identify data that will need to be collected to process application and determine eligibility	Jan 2011	Feb 2013	x	x	x	x	x	x	x	x	x							
Identify data sources for identity, employment and income verification	Jun 2011	Nov 2011		x	x	x												
Develop processes for citizenship and income verification with the federal data hub	Jan 2012	Dec 2012					x	x	x	x								
Develop processes for identity verification of applicants	Jan 2012	Dec 2012					x	x	x	x								
Ensure the appropriate privacy protections and capacity to accept, store, associate, and process documents received from individual applicants and enrollees electronically, and the ability to accept, image, upload, associate, and process paper documentation received from applicants and enrollees via mail and/or fax	Oct 2012	Sep 2013					x	x	x	x	x	x	x					
Link DIMMS system to DCAS	Oct 2012	Dec 2012								x								
Determine individual eligibility for enrollment in a QHP through the Exchange and for employee and employer participation in the SHOP	Oct 2013	Ongoing												x	x	x	x	x
Provide oversight of the eligibility engine development	Oct 2012	Jun 2013								x	x	x						
Develop SHOP eligibility workflows with connections to individual eligibility processes	May 2012	Dec 2012						x	x	x								
Determine process for individuals who are not immediately able to be determined eligible for Medicaid and advance premium tax credits	Jan 2012	Dec 2012					x	x	x	x								
Determine eligibility for Medicaid and CHIP based on Modified Adjusted Gross Income (MAGI)	Oct 2013	Ongoing												x	x	x	x	x
Convert current Net Income thresholds to MAGI thresholds in State Plan	Jun 2012	Dec 2012							x	x								
Develop or re-use MAGI rules engine, including countable and non-countable income	Oct 2012	Dec 2012								x								
Determine eligibility for APTC and CSR, including calculating maximum APTC through the use of a Federally-managed service	Oct 2013	Ongoing												x	x	x	x	x
Identify and adhere to requirements for connecting to federal APTC/CSR service	Oct 2012	Dec 2012								x								
Develop and implement the capacity to independently send notices, as necessary, to applicants and employers pursuant to 45 CFR 155 subpart D that are in plain language, address the appropriate audience, and meet content requirements.	Apr 2013	Sep 2013										x	x					

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			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Review Federal requirements for notices	Mar 2012	Ongoing						x	x	x	x	x	x	x	x	x	x	x
Survey existing notices for Medicaid and other health programs	Jul 2012	Nov 2012							x	x								
Develop notice content that is accessible to consumers of varying education levels and languages	Oct 2012	Dec 2012								x								
Receive input from outreach/education stakeholder group on draft notices	Jan 2013	Mar 2013									x							
Finalize notices including stakeholder review, testing, translation of content, etc.	Apr 2012	Aug 2012						x	x									
Accept applications and updates, conduct verifications, and determine eligibility for individual responsibility requirement and payment exemptions independently or through the use of Federally-managed services	Oct 2013	Ongoing												x	x	x	x	x
Create link between DCAS and federal IRE service	Oct 2012	Dec 2012								x								
Identify and adhere to requirements for connecting to federal APTC/CSR service	Oct 2012	Dec 2012								x								
Support the eligibility appeals process and implement appeals decisions, as appropriate, for individuals, employers, and employees	Oct 2013	Ongoing												x	x	x	x	x
Review existing programs and appeals processes for eligibility determinations	May 2011	Sep 2011		x	x													
Review federal requirements on appeals	Nov 2011	Ongoing				x	x	x	x	x	x	x	x	x	x	x	x	x
Develop draft business processes and operational plan for appeals function	Feb 2012	Sep 2012					x	x	x									
Determine resources to handle appeals of eligibility determinations	Apr 2012	Dec 2012						x	x	x								
Create process flow for how appeals process will be coordinated with Medicaid	Oct 2012	Dec 2012							x	x								
Establish resources to handle appeals of eligibility determinations, including training on eligibility requirements	Jan 2013	Jul 2013									x	x	x					
Develop implementation plan for establishing an appeals process	Oct 2012	Jan 2013								x	x							
Hire appeals staff	Dec 2012	Sep 2013								x	x	x	x					
Receive input from outreach/education stakeholder group on appeals process	Dec 2012	Sep 2013								x	x	x	x					
Develop training materials for call center workers, eligibility workers, Navigators, and others on the eligibility requirements/appeals.	Jan 2013	Jul 2013									x	x	x					
Begin receiving and adjudicating requests	Oct 2013	Ongoing												x	x	x	x	x
Begin developing requirements for systems and program operations, including coordination of employer appeals with appeals of individual eligibility and submission of relevant data to HHS	Sep 2011	Sep 2012			x	x	x	x	x									
Review ACA and subsequent federal guidance on appeals of employer liability	Jan 2011	Ongoing	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Create process flow for how employer appeals process will be coordinated	Jul 2012	Dec 2012							x	x								
Develop implementation plan for establishing an appeals process	Oct 2012	Jan 2013								x	x							
Begin notifying employers in coordination with eligibility determinations	Oct 2013	Dec 2014											x	x	x	x	x	x
Process QHP selections and terminations, compute actual APTC, and report and reconcile QHP selections, terminations, and APTC/advance CSR information in coordination with issuers and CMS, including exchanging relevant information with issuers and CMS using electronic enrollment transaction standards	Oct 2013	Ongoing												x	x	x	x	x
Developing system requirements to process selections, terminations, and APTC and to engage in reconciliation with carriers and CMS	Feb 2012	May 2013									x	x						
Build system compliant with requirements	Oct 2012	May 2013									x	x						
Test system to ensure compliance with requirements	May 2013	Sep 2013										x	x					

Milestone / Deliverables	Start Date	End Date	2011				2012				2013				2014			
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Electronically report results of eligibility and exemption assessments and determinations, and provide associated information to HHS, IRS, and other agencies administering Insurance Affordability Programs, as applicable, including information necessary to support administration of the APTC and CSR as well as to support the employer responsibility provisions of the Affordable Care Act.	Oct 2013	Ongoing												x	x	x	x	x
Coordinate with federal service on exemption assessments	Jan 2011	Ongoing	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Developing system requirements to report eligibility and exemption determinations to carriers, employers, Medicaid, HHS, and IRS	Sep 2011	Sep 2013							x	x	x	x	x					
Build system compliant with requirements	Oct 2012	May 2013									x	x						
Test system to ensure compliance with requirements	Jan 2013	Jul 2013										x	x					
Plan Management																		
Develop and implement a process to certify QHPs	Apr 2012	Ongoing						x	x	x	x	x	x	x	x	x	x	x
Begin to establish a strategy and timeline for QHP certification	Apr 2012	Apr 2012						x										
Develop a clear certification process including a timeline for application submission, evaluation, and selection of QHPs	May 2012	Mar 2013								x	x							
Engage stakeholders to gather input on potential certification criteria	Jun 2012	Mar 2013								x	x							
Develop certification options and criteria for Board	Sep 2012	Mar 2013									x							
Finalize certification requirements	Oct 2012	Mar 2013									x							
Conduct meetings with District issuers to identify key issues and processes for QHP certification	Jun 2012	Mar 2013									x							
Develop and Implement a plan management system to support the collection of QHP issuer and plan data; facilitate the QHP certification process; manage QHP issuers and plans; and integrate with other Exchange business areas, including the Exchange Internet Web site, call center, quality, eligibility and enrollment, and premium processing	Jan 2012	Ongoing					x	x	x	x	x	x	x	x	x	x	x	x
Participate in NAIC discussions and meetings about the SERFF plan management module	Aug 2011	Ongoing			x	x	x	x	x	x	x	x	x	x	x	x	x	x
Develop requirements for DCAS to interface with SERFF	Jan 2012	Jun 2012					x	x										
Participate in SERFF testing	Aug 2012	Oct 2013							x	x	x	x	x					
Train DISB staff to use SERFF plan management module	Sep 2012	May 2013									x	x						
Implement SERFF plan management module	Oct 2013	Ongoing											x	x	x	x	x	x
Ensure QHPs' ongoing compliance with QHP certification requirements, including a process for monitoring QHP performance and collecting, analyzing, and resolving enrollee complaints	Oct 2013	Ongoing												x	x	x	x	x
Develop a process and policies for ongoing monitoring of QHPs	Jan 2012	Feb 2013									x							

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			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Monitor the QHPs for practices, conduct, pricing, and products inside and outside the Exchange	Jan 2013	Ongoing									x	x	x	x	x	x	x	x
Support issuers and provides technical assistance to ensure ongoing compliance with QHP issuer operational standards.	Oct 2013	Ongoing												x	x	x	x	x
Develop technical assistance standards, policies, and processes within DISB	Jul 2012	Mar 2013							x	x	x							
Provide training to District issuers offering QHPs	Feb 2013	Ongoing									x	x	x	x	x	x	x	x
Train DISB staff on providing assistance to issuers offering QHPs	Nov 2012	Ongoing								x	x	x	x	x	x	x	x	x
Develop and Implement a process for QHP issuer recertification, decertification, and appeal of decertification determinations	Nov 2012	Ongoing								x	x	x	x	x	x	x	x	x
Discuss QHP recertification, decertification, and appeal processes with issuers and consumer stakeholders	Jun 2012	Ongoing								x	x	x	x	x	x	x	x	x
Develop processes that meet the needs of issuers and protect consumer interests related to plan selection opportunities	Jan 2012	Ongoing								x	x	x	x	x	x	x	x	x
Present policies and processes to the Board	Oct 2012	Nov 2012								x								
Train staff on QHP appeals	Oct 2012	Oct 2013								x	x	x	x	x				
Implement systems and procedures to ensure that QHP issuers meet the minimum certification requirements pertaining to quality reporting and provide relevant information to the Exchange and HHS	Oct 2013	Ongoing										x	x	x	x	x	x	x
Financial Management, Risk Adjustment, and Reinsurance																		
Work with the federal government to participate the federal risk adjustment program	Aug 2011	Ongoing			x	x	x	x	x	x	x	x	x	x	x	x	x	x
Review federal guidance related to risk adjustment	Aug 2011	Ongoing			x	x	x	x	x	x	x	x	x	x	x	x	x	x
Ensure systems and policies support participation in federal program	Jan 2012	Sep 2013					x	x	x	x	x	x	x					
Work with the federal government to participate in the federal reinsurance program	Aug 2011	Ongoing			x	x	x	x	x	x	x	x	x	x	x	x	x	x
Review federal guidance related to reinsurance	Aug 2011	Ongoing			x	x	x	x	x	x	x	x	x	x	x	x	x	x
Ensure systems and polices support participation in federal program	Jan 2012	Sep 2013					x	x	x	x	x	x	x					
Small Business Health Options Program (SHOP)																		
Ensure compliance with regulatory requirements pursuant to 45 CFR 155 Subpart H	Ongoing	Ongoing	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Develop SHOP business and technical requirements for DCAS	Apr 2012	Jun 2012						x										

Milestone / Deliverables	Start Date	End Date	2011				2012				2013				2014			
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Conduct employer meetings, surveys, and focus groups small employers' opinions about the SHOP Exchange and identify functions that will be valuable to them.	Jun 2011	Sep 2012						x	x									
Outline all functions necessary for a successful SHOP Exchange	May 2012	Jun 2012						x										
Develop system and operational processes for SHOP	Jul 2012	Ongoing							x	x	x	x	x	x	x	x	x	x
Conduct regular meetings to understand the needs of small employers and how the SHOP is meeting those needs	Jul 2012	Ongoing							x	x	x	x	x	x	x	x	x	x
Hire staff to assist with small business functions	Oct 2012	Jan 2013								x	x							
Implement SHOP premium aggregation pursuant to 45 CFR 155.705	Oct 2013	Ongoing												x	x	x	x	x
Organization and Human Resources																		
Develop an appropriate organizational structure and staffing resources to perform Exchange activities	May 2012	Jan 2013						x	x	x	x							
Develop staffing plan based on operational model of the Exchange	May 2012	Jun 2012						x										
Establish HR policies and procedures for the Exchange	Jun 2012	Mar 2013								x	x							
Develop position descriptions	Jul 2012	Mar 2013								x	x							
Engage search firm to hire Exchange Executive Director	Aug 2012	Sep 2012							x									
Hire senior Exchange staff to support implementation	Oct 2012	Dec 2012								x								
Hire remaining Exchange staff to ensure appropriate support during implementation and operations	Dec 2012	Mar 2013									x							
Finance and Accounting																		
Adhere to HHS financial monitoring activities carried out under the Exchange grants	Jan 2012	Ongoing					x	x	x	x	x	x	x	x	x	x	x	x
Develop a long-term operational cost, budget, and management plan	Apr 2012	May 2013									x	x						
Technology																		
The Exchange has the adequate technology infrastructure and bandwidth required to support all of the Exchange activities	Feb 2012	Sep 2013					x	x	x	x	x	x	x					
Develop security risk assessment and release plan	Jan 2012	Apr 2012					x	x										
Finalize IT and integration architecture	Jan 2012	Apr 2012					x	x										
Complete Final requirements documentation (Blueprint)	Jan 2012	Apr 2012					x	x										
Conduct Design Review Consult with CCIIO	Jun 2012	Jun 2012						x										
Design and Execute legacy system functional migration	Jun 2012	Dec 2012						x	x	x								
Develop RFP for a System Integrator (SI) vendor to design, build, and implement the system	Aug 2012	Sep 2012							x									
Release RFP for a SI vendor to design, build, and implement the system	Oct 2012	Oct 2012								x								
Award contract for a SI vendor to design, build, and implement the system	Dec 2012	Jan 2013									x							
Complete requirements validation with SI vendor	Oct 2012	Feb 2013									x							

District of Columbia Level Two Establishment Grant: Work Plan

Milestone / Deliverables	Start Date	End Date	2011				2012				2013				2014			
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Execute Design phase for DCAS Release 1 functionality	Nov 2012	Feb 2013									x	x						
Execute Build phase for DCAS Release 1 functionality	Jan 2013	Apr 2013									x	x						
Complete Release 1 Data conversion	Mar 2013	Sep 2013										x	x					
Privacy and Security																		
Establish and implement written policies and procedures regarding the Privacy and Security standards set forth in 45 CFR 155.260(a)-(g)	Oct 2012	Sep 2013								x	x	x	x					
Implement adequate safeguards to protect the confidentiality of all Federal information received through the Data Services Hub, including but not limited to Federal tax information	Oct 2012	Sep 2013								x	x	x	x					
Execute Static Security Analysis	Mar 2013	Apr 2013										x						
Execute Security Integration Testing	May 2013	Aug 2013										x	x					
Execute Dynamic Security Analysis	Jun 2013	Aug 2013										x	x					
Conduct Final Security Review	Aug 2013	Aug 2013											x					
Conduct Risk Analysis	Aug 2013	Sep 2013											x					
Implement System Security Monitoring and Response plan	Sep 2013	Sep 2013											x					
Oversight, Monitoring, and Reporting																		
Establish a process to perform required activities related to routine oversight and monitoring of Exchange activities	Jan 2013	Apr 2013									x	x						
Hire staff responsible for oversight and program integrity function	Dec 2012	Jan 2013									x							
Develop detailed process and procedures for oversight and monitoring based on program integrity plan	Jan 2013	Apr 2013									x	x						
Track and report performance and outcome metrics related to Exchange Activities in a format and manner specified by HHS necessary for, but not limited to, annual reports required by Affordable Care Act 1313(a)	Oct 2013	Ongoing												x	x	x	x	x
Identify performance and outcome metrics related to the Exchange	Jan 2013	Apr 2013									x	x						
Develop procedures for collecting, tracking and reporting metrics to HHS	Apr 2013	Aug 2013										x	x					
Submit metrics to HHS	Oct 2013	Ongoing												x	x	x	x	x
Contracting, Outsourcing, and Agreements																		
Execute the appropriate contractual, outsourcing, and partnership agreements with vendors and State and Federal agencies for all Exchange activities and functionality as needed, including data and privacy agreements	Oct 2012	Ongoing								x	x	x	x	x	x	x	x	x