Arkansas Department of Human Services

Minimal Essential Coverage 1095-B Compliance

Process Flow Narrative

Version 2
Date: July 25, 2019

NTT DaTa

Revision History

Version Number	Date	Author	Comments
1.0	March 7, 2017	Victoria Clark	Created Process Flow Narrative
1.1	March 22, 2017	Victoria Clark	Revised step for how data is transmitted from MMIS to DSS Removed Section 5 – Roles & Responsibilities
1.2	April 28, 2017	Victoria Clark	Revised HPE to DXC Technologies, Revised Standard Register to Taylor Communications, Updated security section to include Deloitte and Taylor Communication security protocols
1.3	April 23, 2018	Victoria Clark	Update current vendor name to 'awardee', remove reference to address updates in correction file, modified 'Laborwise portals' to 'portals', updated process flows to 'Awardee'
2.0	July 25, 2019	Victoria Clark	Update 'Awardee' to 'ACA GPS, LLC', updates to processes for High-Level, IRS, DCFS, DCO, DXC, AFMC, and Optum, and Return Mail
2.1	July 29, 2019	Victoria Clark	Updated High-Level Flow, ACA GPS Flow, AFMC Flow and Process

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1.0 INTRODUCTION

Under the Affordable Care Act (ACA), beginning with the 2015 calendar year, insurers/coverage providers are required to provide coverage information for each month a person has coverage during the year. For the Department of Medical Services (DMS), this information will be provided via Form 1095-B. Form 1095-B will be mailed via the United States Postal Service to all members who had qualifying minimal essential coverage for the respective calendar year.

The project is a coordinated effort between The Department of County Operations (DCO), The Division of Medical Services (DMS), Division of Children and Family Services (DCFS), DHS Communications, Optum, ACA GPS, LLC, AFMC, Internal Revenue Service (IRS), and DXC Technology (DXC).

2.0 DOCUMENT OVERVIEW

The Process Flow Narrative details the transmission of data and physical documentation in relation to compliance with the Affordable Care Act (ACA) mandate to provide proof of minimal essential coverage. The following processes illustrate and define how the various data methods and physical documentation are transmitted by the above-referenced systems and vendors.

2.1 High-Level Form Process

The image illustrated in Figure 1: High-Level Form Process depicts the flow at a high level through various parties.

- The Division of County Operations (DCO) receives Recipient E&E (Eligibility & Enrollment) documentation from the recipient and is input into either the ANSWER or Cúram systems.

- The Recipient E&E data is sent from the DCO ANSWER or Cúram systems to the vendor DXC (DXC Technology) and is input into the MMIS (Medicaid Management Information System).

- The eligibility data from the DXC MMIS is sent daily in an automated batch cycle directly to the vendor, Optum's DSS (Decision Support System).

- The Division of Children and Family Services (DCFS) generates a file of the sensitive population from the CHRIS system and transmits, via Accellion, Optum.

- Optum combines the MMIS and DCFS data, where a data feed is created. Optum generates Edit Fail files, containing recipient data that did not meet the requirements due to data integrity issues. The Edit Fail files are transmitted to DCO, DCFS, and AFMC for triage (an MMIS point of contact is needed for data that needs corrected in MMIS).

- The data feed is provided to ACA GPS, LLC for printing of the Form 1095-B and the respective envelope, and uploaded to the ACA GPS Management Tool supported by ACA GPS, LLC.

- The envelope and Form 1095-B are mailed to the recipient.

- The Form 1095-B is also available to DXC Call Center and DCO (Division of County Operations) via the ACA GPS Tool for triaging of Form 1095-B issues.

- The data from ACA GPS, LLC is transmitted to DCO in two separate forms:
  - File(s) containing errors in the data are sent to DCO for triaging
  - File(s) containing data for IRS submission to are sent to DCO

- The triaged data is resent through the process in order to transmit a corrected form.
- The IRS submission is transmitted to the IRS via the IRS AIR system web portal.
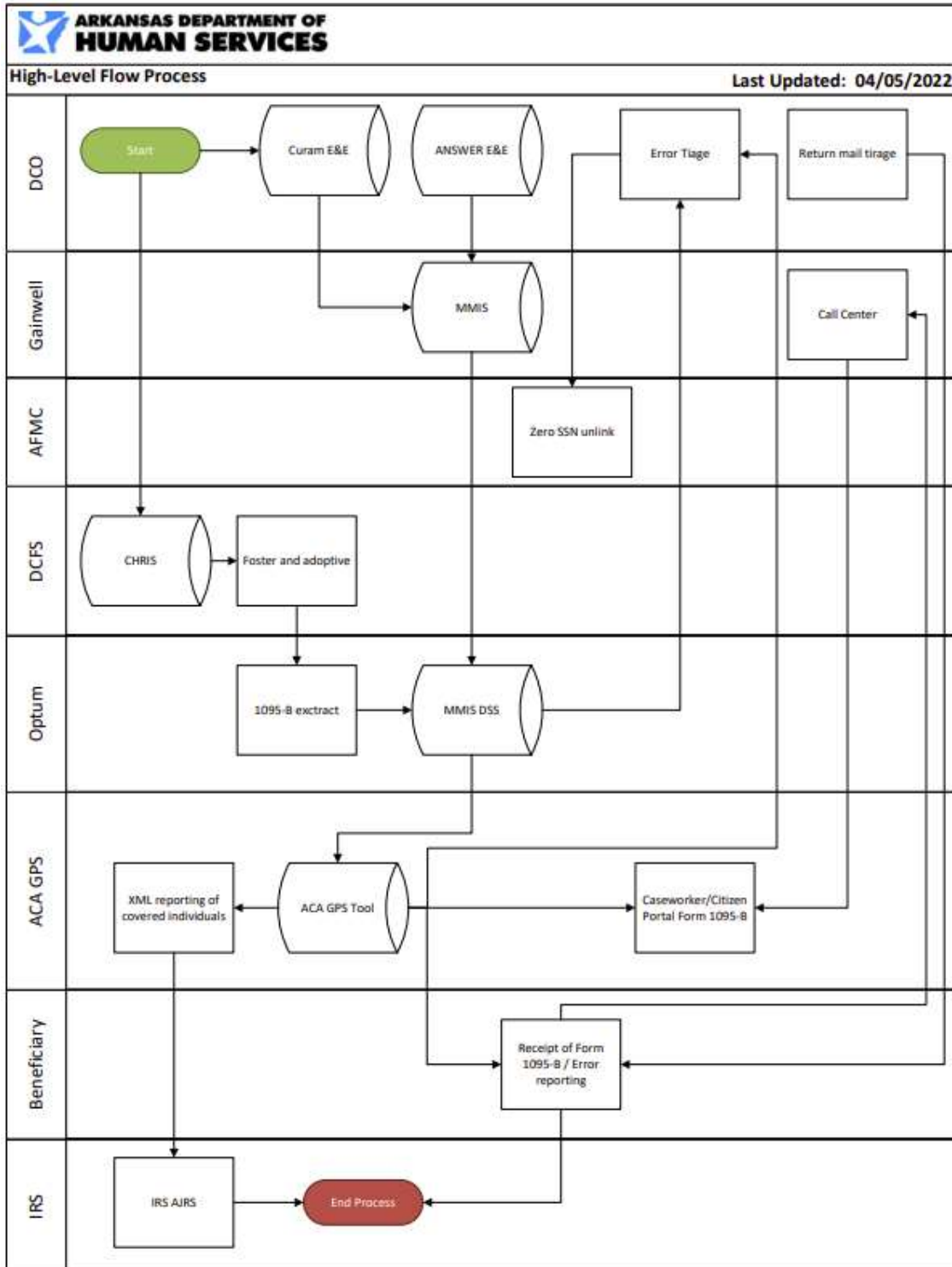
2.2   High-Level Flow

Figure 1: High-Level Form Process

2.3   ACA GPS, LLC Process

The image illustrated in Figure 2: ACA GPS Process depicts the flow of data and physical documentation through ACA GPS.

- The Division of County Operations (DCO) receives Recipient E&E (Eligibility & Enrollment) documentation from the recipient and is input into either the ANSWER or Cúram systems. Data is also transmitted to DHS systems from the Social Security Administration. NOTE: Data from the SSA cannot be modified in DHS systems so the recipient data is modified in the ACA GPS Tool for form processing. There is a need for a handshake between DHS and the SSA for reporting data discrepancies for IRS reporting compliance.

- The Recipient E&E data is sent from the DCO ANSWER or Cúram systems to the vendor DXC (DXC Technology) and is input into the MMIS (Medicaid Management Information System). Currently, a high volume of recipient data is maligned due to MMIS logic when consuming the data, which results in an invalid form mailing. There is a need for an MMIS SME to process the recipient cases to correct the instances in the MMIS.

- The eligibility data from the DXC MMIS is sent daily in an automated batch cycle directly to the vendor, Optum's DSS (Decision Support System) where a data feed is created. Optum creates a file from the data feed and transmits to the vendor, ACA GPS, via Accellion.

- ACA GPS processes the file and provides operational reports to DCO and Optum containing the data that is unable to be processed due to errors in the data. The data that passed testing is uploaded to the ACA GPS Tool hosted by ACA GPS and sent to Brandywine Printing, Inc. printing company.

- Brandywine Printing prints Form 1095-B and the respective envelope and mails to the recipients.

- ACA GPS generates an IRS XML file containing recipient mailing information and submits the IRS XML file via the IRS AIR system.

- ACA transmits Weekly Operations reports to DCO leadership, containing information on form processing and ACA GPS Tool traffic.

- Form Requests: Recipients are able to request 1095-B forms for the current and prior tax years.
  - Recipients requesting forms from DXC: DXC will access the ACA GPS Tool and submit a request. If changes are needed to the recipient's data, the DXC user will advise the recipient to contact the appropriate DHS local county office. If the ACA GPS Tool indicates the recipient is part of the sensitive population (foster/adopted), the DXC user will direct the recipient to contact DCFS for form processing.
  - Recipients requesting forms from DCFS: The DCFS user will review the recipient's data in the CHRIS system, and submit the request in the ACA GPS Tool.
  - Recipients requesting forms from DCO: The DCO Caseworker will review the recipient's data in ANSWER/Cúram, and make changes, if needed. NOTE: If the recipient's case is closed, the Caseworker will not be able to modify data in the DHS system(s). The Caseworker accesses the ACA GPS Tool and either, submits a request for mailing, or modifies data in the ACA GPS Tool and then submits the request for mailing.
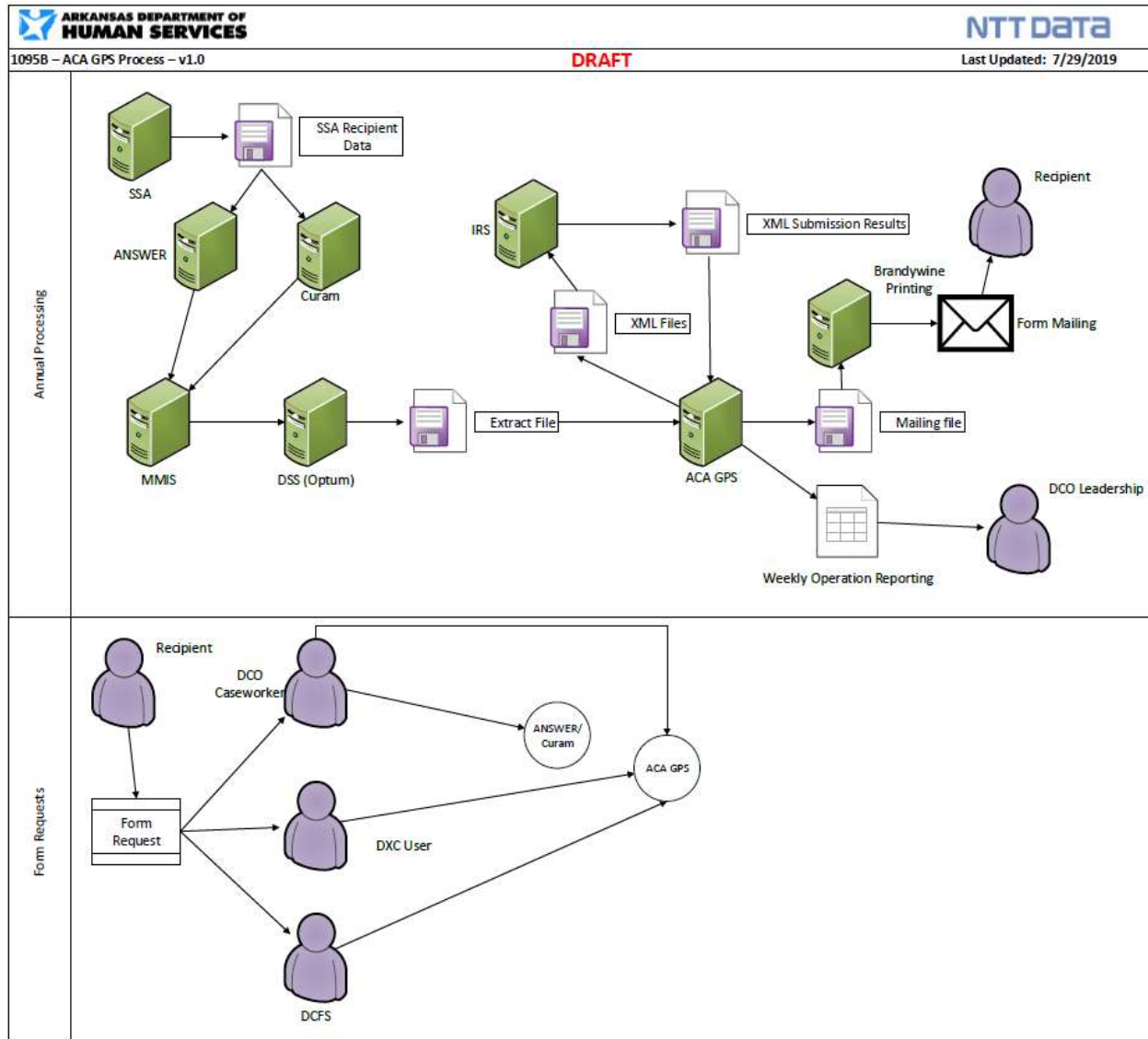
2.4 ACA GPS, LLC Flow

Figure 2: ACA GPS Process

2.5 IRS Reporting Process

The image illustrated in Figure 3: IRS Reporting Process depicts the flow of data for compliance with IRS reporting requirements.

- ACA GPS generates an XML file containing Manifest and Form data files for recipients that have been sent to the recipient and contained in the ACA GPS Tool.

- ACA GPS submits the XML file to the IRS AIR system. A Transmission Confirmation containing a Receipt ID (RID) is provided by the IRS AIR system upon upload of the file.

- The IRS processes the XML file and provides a transmission status.

- ACA GPS receives the transmission status from the IRS AIR system. The files that are "Accepted" complete the IRS reporting process. An Error Detail Report is generated for files that are "Accepted with Errors" and "Rejected" for errors.

- DCO processes the Error Detail Report and triages the errors contained therein. The corrected data is reprocessed.
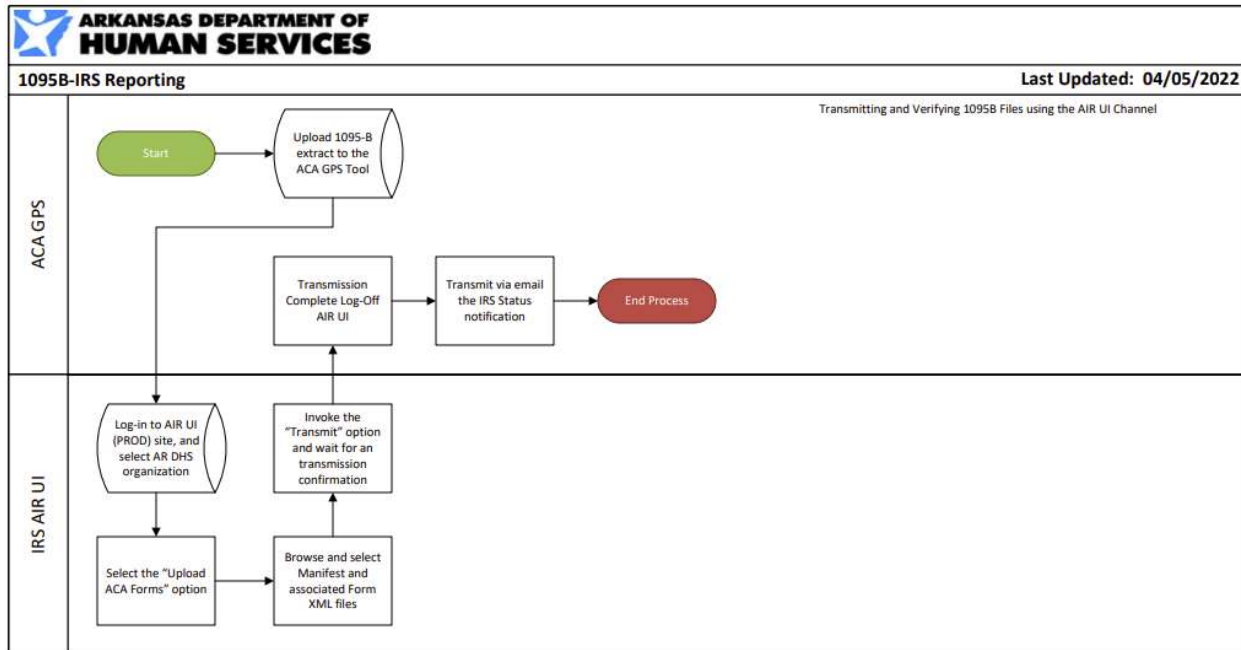
2.6   IRS Reporting Flow

Figure 3: IRS Reporting Process

2.7   IRS AIR Process

The image illustrated in Figure 4: IRS AIR depicts the flow of data within the IRS AIR system.

- ACA GPS uploads the XML file containing the Manifest and Form Data files via the IRS AIR system user interface.

- The IRS processes the XML file submission and generates a Transmission Confirmation containing a Receipt ID (RID) for each submission.

- ACA GPS logs into IRS AIR system to retrieve the transmission status. The files that are "Accepted" complete the IRS reporting process. An Error Detail Report is generated for files that are "Accepted with Errors" and "Rejected" for errors.

- Files that were "Accepted with Errors" and "Rejected" for errors are triaged and processed for resubmission.
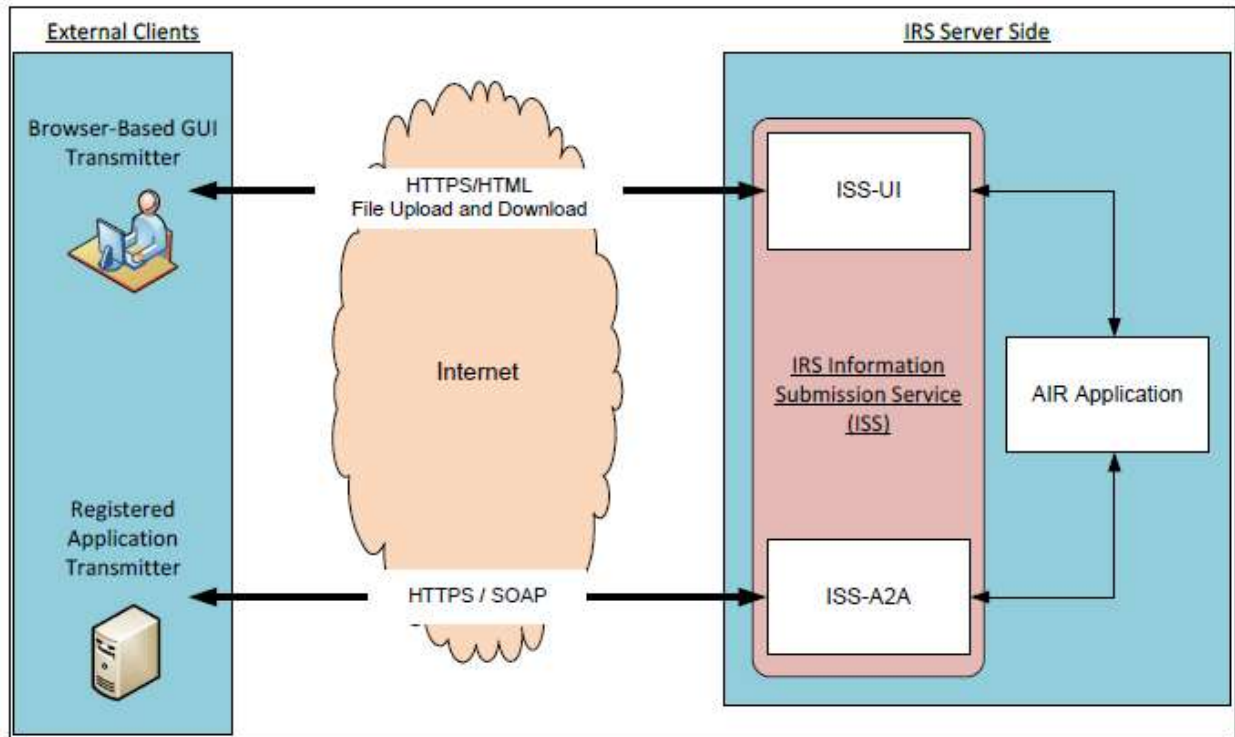
2.8   IRS AIR Flow

Figure 2-1: External Clients and IRS AIR

Figure 4: IRS AIR

2.9   AFMC Process

The image illustrated in Figure 5: AFMC Unlinked Zero SSN Process depicts the flow of data through AFMC (Arkansas Foundation for Medical Care). When SSN's from ANSWER and Cúram do not match MMIS, the link between the systems is broken and the SSN in MMIS is zeroed out. AFMC triages the unlinked, zero SSN and applies the correction in MMIS.

- The Division of County Operations (DCO) receives Recipient E&E (Eligibility & Enrollment) documentation from the recipient and is input into either the ANSWER or Cúram systems.

- The Recipient E&E data is sent from the DCO ANSWER or Cúram systems to the vendor DXC (DXC Technology) and is uploaded to the MMIS (Medicaid Management Information System).

- If the data from ANSWER and/or Cúram does not match the data in MMIS, the data from ANSWER and/or Cúram is unlinked with the MMIS, and the SSN in the MMIS is zeroed out.

- The data is pulled from the DXC MMIS by the vendor Optum and is uploaded to the DSS (Decision Support System). Optum generates a list of the unlinked zero SSN's and sends to AFMC.

- AFMC uploads the data into the SalesForce database. The data is then presented to AFMC designated agents in queue format for processing.

- AFMC agents triage the unlinked zero SSN's and correct in the MMIS. AFMC generates a quarterly report of triaged SSN's and uploads to their SharePoint site for DCO to review.
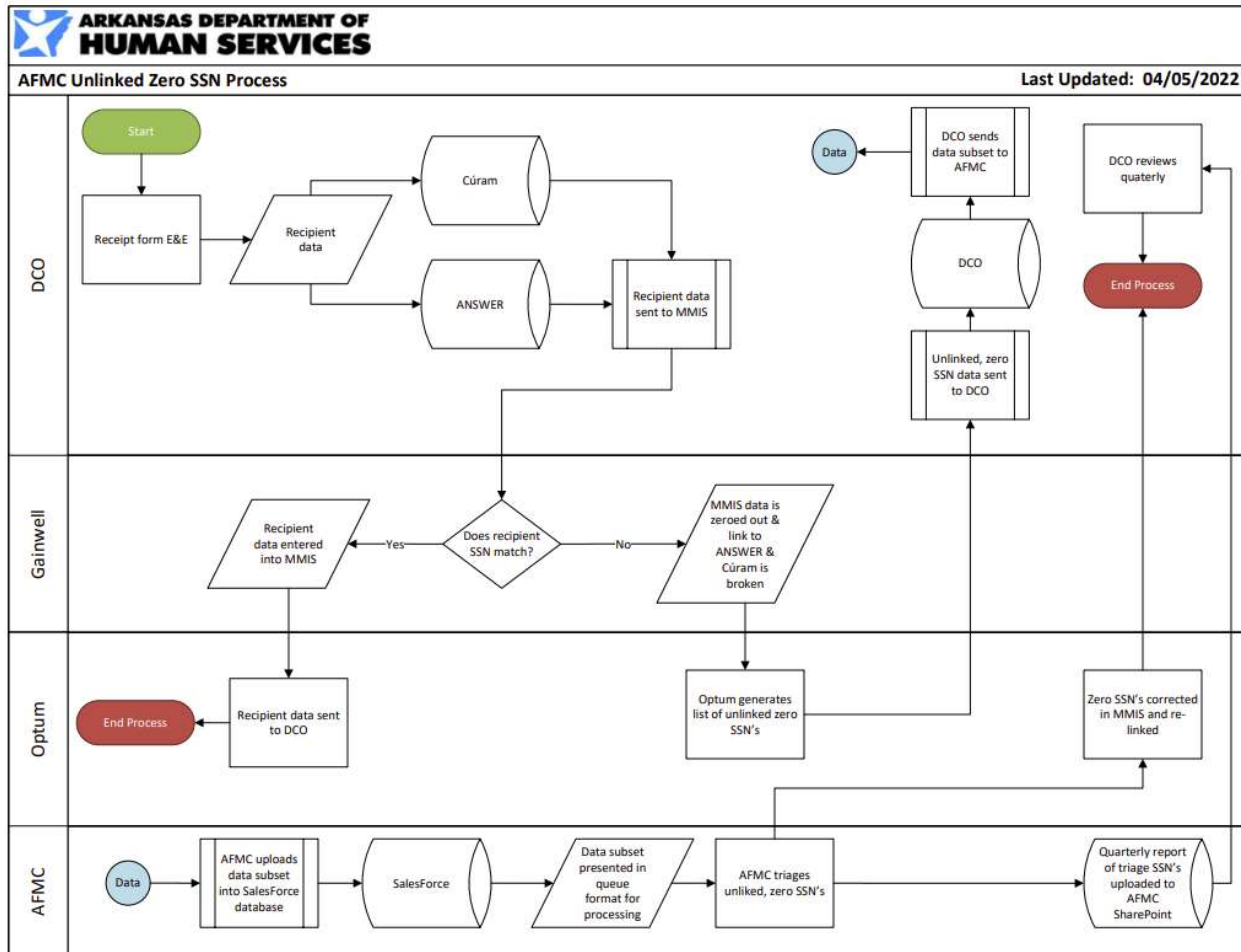
2.10 AFMC Flow

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AFMC Unlinked Zero SSN Process — Last Updated: 04/05/2022

Figure 5: AFMC Unlinked Zero SSN Process

2.11 DCFS Process

The Division of Children and Family Services (DCFS) provides services for the youth and children sector of Arkansas. Specifically, in relation to the foster and adopted children components of DCFS, additional steps must be completed to ensure privacy and security when transmitting Form 1095-B. The steps are outlined as follows and depicted in Figure 6: DCFS Process:

- The Division of Children and Family Services (DCFS) receives Recipient E&E (Eligibility & Enrollment) documentation from the recipient and is input into the CHRIS system.

- A subset of the recipient data is pulled from CHRIS and entered into an Excel spreadsheet. The spreadsheet is sent to Optum via Accellion.

- Optum reviews the spreadsheet and notes the distinction as to whether the recipient is foster or adopted.
    - If the recipient is classified as 'adopted', Optum compares the recipient address from the spreadsheet to the address listed in the DSS extract. If the addresses match, the DSS extract is sent to ACA GPS. If the addresses do not match, the address from the spreadsheet is used for the data feed extract. The DSS extract is then sent to ACA GPS via Accellion.
    - If the recipient is classified as 'adopted', ACA GPS creates a data file and sends to Brandywine for printing and mailing.
- ACA GPS reviews the extract and notes the distinction as to whether the recipient is classified as 'foster'.
    - If the recipient is classified as 'foster', Optum sets a 'no mail' flag for the recipient and overlays the address that is listed in the DSS extract with a DHS address. The DSS extract is then sent to ACA GPS via Accellion.
    - If the recipient is classified as 'foster', ACA GPS adheres to the 'no mail' process.
- DCFS receives an Edit Fail file from Optum containing records that need to be manually reviewed before the data is sent to ACA GPS
    - DCFS compares the data received in the Edit Fail file with the MMIS and CHRIS systems
    - DCFS provides Optum with the results of the manual review
- DCFS processes all sensitive population requests for 1095-B forms
    - DCFS reviews the CHRIS system and submits a request in the ACA GPS Tool for form generation and mailing
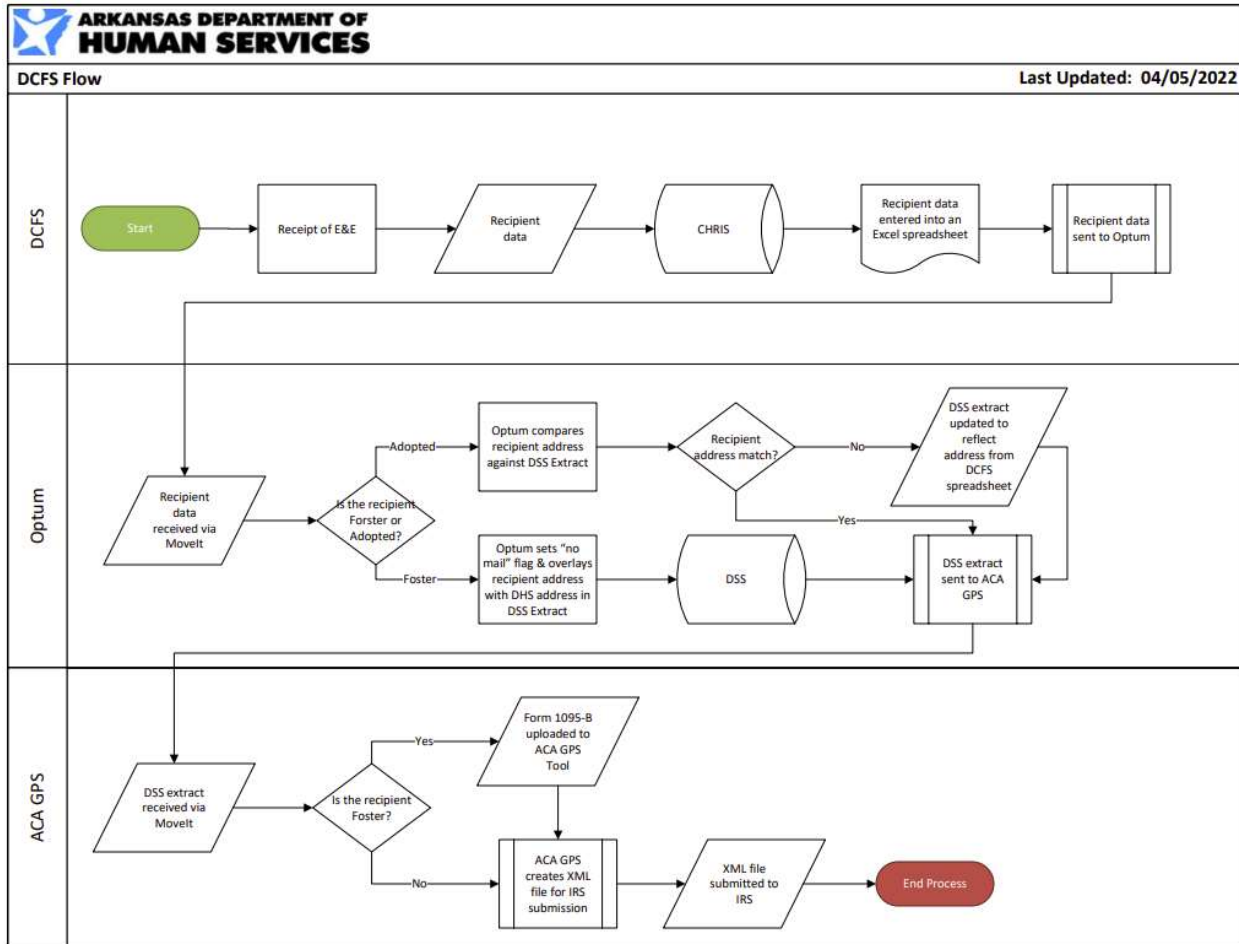
2.12 DCFS Flow

Figure 6: DCFS Process

2.13 Return Mail Process

Form 1095-B is provided to recipients via electronic format and/or physically mailed. When a physically-mailed form is undeliverable and retuned, the form is processed in an effort to obtain valid data to resend to the recipient. NOTE: The return mail process is suspended, beginning TY2018 per instruction from the Director's office. The return mail process steps are outlined as follows and depicted in Figure 7: Return Mail Process:

- The Division of County Operations (DCO) receives Recipient E&E (Eligibility & Enrollment) documentation from the recipient and is input into either the ANSWER or Cúram systems.

- The Recipient E&E data is sent from the DCO ANSWER or Cúram systems to the vendor DXC Technology and is input into the MMIS (Medicaid Management Information System).

- The eligibility data from the DXC MMIS is sent daily in an automated batch cycle directly to the vendor, Optum's DSS (Decision Support System) where a data feed is created. Optum creates a file from the data feed and transmits to the vendor, ACA GPS, via Accellion.

- ACA GPS processes the file and uploads to the Tool hosted by ACA GPS and sends to Brandywine Printing company.

- Brandywine Printing prints Form 1095-B, the respective envelope, and mails to the recipients. The envelope is printed with a QR code (similar to a bar code) to triage return mailings.

- Returned mail is received at a DHS PO Box specifically designated for 1095-B return forms. SRC processes the returned mailings by running through an ADF (Automatic Document Feeder) which scans the QR code printed on the envelope. The scanned, returned mail is sent to the DCO – Pine Bluff location to begin efforts for triaging. SRC sends a file containing pertinent information derived from the scanned QR code to eSystems (EEF). eSystems (EEF) reformats the file and adds identifiable recipient data, and then sends to DCO, and ACA GPS, via Accellion.

- ACA GPS processes the file and flags the Tool with a 'Return Notice'.

- DCO processes the file from eSystems (EEF) and begins triaging the returned mailings. The triaged returns are then reprocessed.
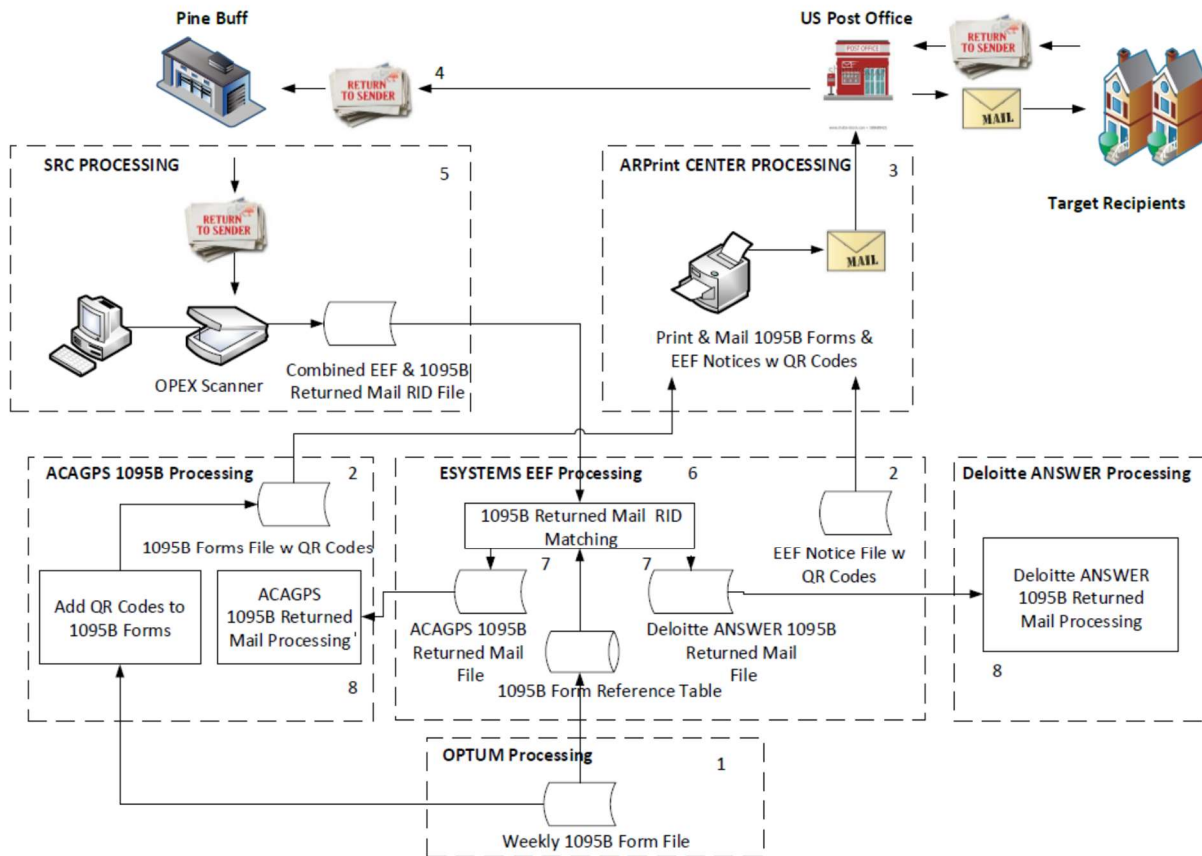
2.14 Return Mail Flow

Figure 7: Return Mail Process

3.0 SECURITY

Section 2 outlines the flow of data and physical documentation from a systems and vendor standpoint. Section 3 defines and depicts the processes and flows from a security standpoint.

3.1 Security Process - IRS Reporting

The image illustrated in **Error! Reference source not found.** depicts the flow data in relation to IRS reporting compliance from a security standpoint.

- The Division of County Operations (DCO) receives Recipient E&E (Eligibility & Enrollment) data which is stored on the following:
  - EEF/Cúram (AR DIS) Arkansas Department of Information Systems network, which consists of:
    - IBM HTTP (HIS) Servers – IHS1 and IHS2
    - Cúram Application Servers – WAS1 and WAS2

- ▪ Cúram IDSdB and Cúram dB
  - o ANSPROD/ANSWER (AR DIS) network, which consists of:
    - ▪ Microfocus is used to prepare the data for online transactional processing using CICS (Customer Information Control System) for migration into the Mainframe.
    - ▪ Data from Traditional Medicaid, SNAP, TANF (TEA) flow to the ANSPRD mainframe as well.
- The data from EEF/Cúram and ANSPRD are transmitted through the Internet using a VPN (Virtual Private Network) to the DXC MMIS.
  - o The data is sent using an ARDHS (Arkansas Department of Human Services) SFTP (Secure File Transfer Protocol) approved-tool called, Accellion.
- The data from EEF/Cúram and ANSPRD are transmitted through the Internet using a VPN to the Optum DSS (Decision Support System).
  - o The data is sent through AR DIS (Arkansas Department of Information Systems) using an ASA (Adaptive Security Appliance) firewall with Cisco software for transmission to the ARDSH and is then transmitted using two-way TLS (Transport Layer Security) protocol to the FED DSH, and is then transmitted to the Internet with HTTPS (Hyper Text Transfer Protocol Secure).
- The data is sent from the DXC MMIS to the vendor ACA GPS and uploaded to the ACA GPS Tool through the Internet using HTTPS/SFTP, and Accellion. The State Case Worker accesses the data using HTTPS authentication. No PHI is stored in the ticketing system.
- The .pdf form data from ACA GPS is retrieved by Brandywine Printing through the Internet using HTTPS/SFTP, AES 128 encryption. Brandywine Printing has a PHI management plan which is vetted by ACA GPS. Brandywine discards the data after mailing.

4.0 TECHNICAL REQUIREMENTS

The technical requirements will be addressed in this section.