

# Enhanced Direct Enrollment (EDE) Partner and Insurance Company Policies for PY 2025

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## Change Log

Date	Modified By	Sections	Program Change Description
10/01/2024	Georgia Access	N/A	Initial publication.
11/07/2024	Georgia Access	2.1, 3.3.2, 3.3.3	2.1: Clarified federal and Georgia Access regulations for web brokers and direct enrollment entities; 3.3.2: Clarified CFR for disenrollments; 3.3.3: Added section on changes in coverage effective dates.

# 1 Overview

## 1.1 Purpose

This document outlines the policies related to Enhanced Direct Enrollment (EDE) Partners and insurance companies for Georgia's State-based Exchange (SBE), Georgia Access. This document is updated at least annually.

## 1.2 Background

Georgia Access is a division within the Office of Commissioner of Insurance and Safety Fire (OCI). The Georgia Access Division is responsible for operating and managing the State's SBE. Georgia Access operated as a State-based Exchange on the Federal Platform (SBE-FP) for plan year (PY) 2024 and is transitioning to a full SBE for PY 2025. Starting November 1, 2024, consumers can shop for and enroll in coverage through Georgia Access ([GeorgiaAccess.gov](https://GeorgiaAccess.gov)) for PY 2025. Consumers can also work with a web broker, insurance company, or Certified Agent to shop for and enroll in coverage.

## 1.3 Key Terms

**Advance premium tax credit (APTC):** An advance of the premium tax credit (PTC) paid to an insurance company to reduce the cost of monthly premiums for eligible individuals buying qualified health plans (QHPs). The APTC amount is based on the consumer's household size and estimated income.

**EDE Partner applicant:** An entity that has submitted an EDE Partner Application to the SBE and is pursuing participation and certification for Georgia Access.

**EDE Partner initial year certification:** The initial year certification is the first Plan Year that an EDE Partner is certified for Georgia Access. For Georgia's SBE, the initial year certification is PY 2025.

**Federally-facilitated Exchange (FFE):** A federal health insurance exchange operated by the Centers for Medicare & Medicaid Services (CMS) pursuant to the Affordable Care Act (ACA) that enables an individual or small-business employer to compare and shop for qualified health plans (QHPs) and stand-alone dental plans (SADPs). FFE may be used interchangeably with HealthCare.gov or Federally-facilitated Marketplace (FFM).

**Georgia Access Contact Center:** The contact center that provides extensive support to consumers, Georgia Access EDE Partners, insurance companies, and Certified Agents.

**Georgia Access Enhanced Direct Enrollment (EDE) Partner:** An organization that is certified to provide a technology platform for consumers to shop for and enroll in QHPs and SADPs. These partners include technology providers, web brokers, and insurance companies. All Georgia Access EDE Partners must hold an FFE EDE certification.

**Georgia Access insurance companies:** Also known as "issuers" or "carriers", insurance companies are licensed by OCI to engage in the business of selling, soliciting, or negotiating insurance in Georgia. They are responsible for plan management activities and back-end enrollment and reconciliation activities. Insurance companies may also be certified as EDE Partners. For Small Business Health Options Program (SHOP), insurance companies offer SHOP plans, process SHOP applications, and enroll employers in SHOP plans.

**Georgia Access Portal:** The State-run online portal that allows consumers to apply for, shop for, and enroll in coverage through Georgia Access. The Georgia Access Portal is one of the enrollment options available to consumers in Georgia.

**Georgia Access website:** A publicly available website ([GeorgiaAccess.gov](https://GeorgiaAccess.gov)) providing information on Georgia Access programs and services, how to access health care coverage, and how to get assistance with applying for coverage.

**Hybrid issuer upstream EDE entity:** Hybrid issuers are upstream EDE insurance companies that implement additional/modified functionality to a primary EDE's technology platform and application beyond minor branding and QHP display changes that may change the consumer experience.

**Hybrid non-issuer upstream EDE entity:** Hybrid non-issuers are upstream EDE web brokers that utilize a primary EDE's technology platform but implement additional functionality/modifications to the application that change the consumer experience.

**Open Enrollment (OE):** The annual period when consumers may enroll in an individual health insurance plan for the upcoming plan year. Generally, this begins November 1 through January 15 of each year.

**Operational readiness reviews (ORRs):** The annual reviews conducted by Georgia Access to assess whether an EDE Partner applicant has met the Georgia Access technical and operational requirements and milestones for Georgia Access certification/recertification.

**Plan year (PY):** The 12-month period of benefit coverage under a health plan. For Georgia Access, a plan year begins January 1st of each year and runs through December 31st of the same year.

**Primary EDE entity:** Primary entities are EDE Partners that legally own and operate the underlying technology platform that provides consumers with plan shopping, selection, and enrollment services. Technology providers are always primary EDE entities.

**Public Use Files (PUFs):** Files generated by Georgia Access to allow the public to access certain types of Exchange and insurance company enrollment data. Georgia Access PUFs include plan- and issuer-level information on certified QHPs and SADPs offered to individuals and small businesses through Georgia Access.

**Qualified health plan (QHP):** An insurance plan that is certified by Georgia Access, provides EHBs, follows established limits on cost sharing, and meets other requirements outlined by the Exchange.

**Special Enrollment Period (SEP):** A time outside of OE when consumers can sign up for health insurance if they experience a qualifying life event (QLE). Consumers can qualify for an SEP if they've experienced certain life events such as moving, getting married, having a child, or losing job-based coverage.

**Stand-alone dental plan (SADP):** A dental plan that is not included as part of a health plan. SADPs are available for consumers to buy without being enrolled in a QHP, unless enrolling via an EDE. The consumer will need to meet QHP eligibility requirements.

**System for Electronic Rates & Forms Filing (SERFF):** The electronic system used by insurance companies and OCI to upload and review plan data. Plan certification and decertification decisions are recorded in SERFF.

**Technology provider:** EDE Partners that legally own and operate the underlying technology platforms leveraged by insurance companies and web brokers to facilitate consumer direct enrollment in QHPs and SADPs. To be considered a technology provider for Georgia Access, an entity must hold FFE EDE certification as a DE technology provider.

**Upstream EDE entity:** EDE Partners that leverage a technology platform owned by a separate primary entity (namely a technology provider) to provide consumers with plan shopping, selection, and enrollment services. Web brokers and insurance companies that leverage a separate technology provider's platform are upstream entities.

**Web broker:** EDE Partners that facilitate consumer direct enrollment in QHPs and/or SADPs via a technology platform. Web brokers display plans across all insurance companies participating in Georgia Access. To be considered a web broker for Georgia Access, an entity must hold FFE EDE and Georgia Access EDE certification as a web broker. Web brokers that own and operate their underlying technology platform are also considered technology providers.

**White-label issuers upstream EDE entity:** Upstream EDE issuers that utilize a primary EDE's technology platform and application and only make minor branding and QHP display changes that do not change the consumer experience.

## 2 EDE Partner Policies

### 2.1 EDE Partner Overview and Requirements

This section outlines the initial requirements for private sector entities seeking to become certified as a Georgia Access EDE Partner. EDE Partners are not considered certified until Georgia Access has:

- Received a complete application from an EDE Partner applicant.
- Confirmed the EDE Partner applicant is certified by The Center for Consumer Information and Insurance Oversight (CCIIO) to participate on the FFE as an FFE EDE entity.
- Confirmed the EDE Partner applicant has met all Georgia Access program, technical, consumer application, and privacy and security requirements.
- Conducted an operational readiness review (ORR) to confirm the EDE Partner applicant's readiness to participate in Georgia Access.
- Certified the EDE Partner applicant as an EDE Partner. Under a traditional SBE model, the State operates a consumer portal as the sole enrollment channel for consumers. Georgia Access, however, uses multiple consumer enrollment channels: a State consumer portal (the Georgia Access Portal) and EDE Partners. Certified Agents can also enroll consumers through an EDE Partner or the Georgia Access Portal. Georgia Access has built requirements for EDE Partners intending to operate on Georgia Access according to federal regulations including:
  - Consumer assistance (45 CFR 155.205)
  - Web brokers (45 CFR 155.220)
  - Direct Enrollment (DE) Entities (45 CFR 155.221)
  - Notices (45 CFR 155.230)
  - Privacy & Security (45 CFR 155.260)

#### 2.1.1 EDE Partner Overview

Enrollment on the FFE was traditionally only done through HealthCare.gov and "Classic" Direct Enrollment (DE) entities, which allow consumers to shop for plans on private sector partner websites while being redirected to HealthCare.gov throughout various points of the enrollment process.

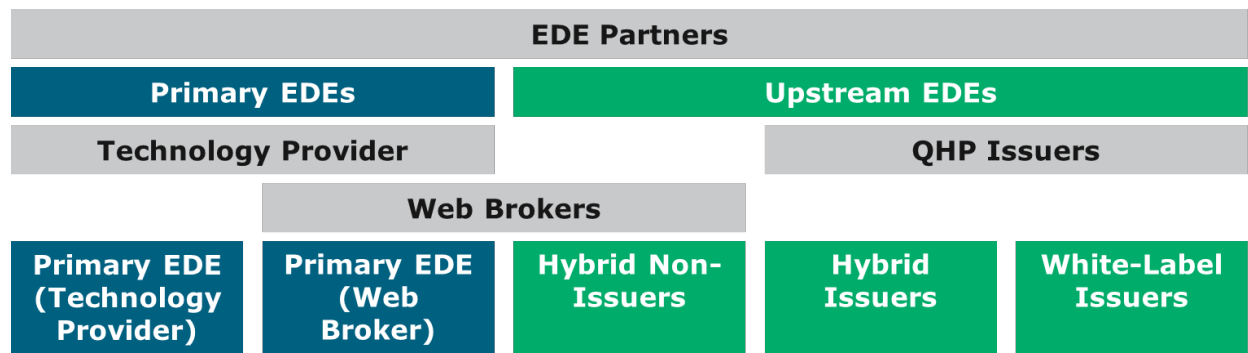
Beginning in OE 2019, CMS rolled out the EDE pathway, allowing consumers more options to enroll in health insurance. CCIIO certifies private sector partners as FFE EDE entities to provide consumers with an end-to-end application, plan shopping, and enrollment experience on the FFE. FFE EDE entities offer an alternative enrollment option to HealthCare.gov.

**2.1.1.1 EDE Partner Types and Classifications**

EDE Partners are certified by Georgia Access to facilitate consumer shopping and enrollment. EDE Partners are certified as one of four entity types:

- Primary EDE entities
- Hybrid non-issuers
- Hybrid issuers
- White-label issuers

The diagram below illustrates how entities may be classified as EDE Partners. For instance, all technology providers are primary EDEs, but web brokers can be primary or upstream EDEs.



**2.1.1.2 Georgia Access EDE Partner Certification Phases**

EDE Partners that are primary entities are certified at Phase 2 or Phase 3 phases for Georgia Access based on the types of consumer enrollment scenarios they support. EDE Partners that are upstream entities assume the phase of their primary entity and are not permitted to support consumer enrollment scenarios beyond those supported by their primary entity.

Georgia Access certification phases mirror FFE EDE entity certification phases. EDE Partners are certified at their FFE EDE entity certification phase unless an EDE Partner requests a phase change or an enhanced phase change after the initial year.

EDE Partners support the following consumer enrollment scenarios at each certification phase:

- **Phase 1:** As of PY 2024, Georgia Access no longer supports Phase 1 EDEs. All Phase 1 consumer enrollment scenarios are subsumed under Phase 2.
- **Phase 2:** Supports the consumer enrollment scenarios listed below. For any enrollment scenarios not supported, Phase 2 EDE Partners must redirect to a Phase 3 EDE Partner via an approved handoff or to the Georgia Access Portal. Phase 2-supported enrollment scenarios include:
  - Single applicants
  - Married applicants
  - Non-pregnant applicants
  - Families without stepchildren or adopted children
  - Full-time students
  - Pregnant applicants
  - Non-U.S. citizens
  - Naturalized U.S. citizens
  - Applicants missing a Social Security Number (SSN)

- Applicants with different names than the one on their SSN cards
- Incarcerated applicants
- Applicants previously in foster care
- Stepchildren
- **Phase 3:** Supports every enrollment scenario, including the most complex cases, without redirecting to a different EDE Partner via an approved handoff or to the Georgia Access Portal. Phase 3-supported enrollment scenarios include:
  - Phase 2-supported scenarios
  - American Indian applicants
  - Alaska Native applicants
  - Married applicants not filing taxes jointly
  - Dependent applicants who are not sons, daughters, or spouses
  - Dependents who are over 25 or who are married

Georgia Access will require all EDE Partners to seek certification as Phase 3 EDEs for PY 2026 and beyond.” Refer to [Section 2.3.1.2.1 Enhanced Phase Changes](#) for more details.

### 2.1.2 EDE Partner Requirements

Private sector partners seeking to participate in Georgia Access must complete and submit a Georgia Access EDE Partner Application to Georgia Access. Refer to [Section 2.2.1 EDE Partner Application Release and Acceptance](#) for more details on the EDE Partner application process.

There are four types of Georgia Access requirements EDE Partners must meet to participate in Georgia Access:

- Program
- Technical integration and testing
- Consumer application
- Privacy and security

#### 2.1.2.1 Program Requirements

The following table lists all program requirements and their applicability to primary EDE entities, hybrid non-issuers, hybrid issuers, and white-label issuers.

Requirement	Applicable to:			
	Primary EDE Entities	Hybrid Non-Issuers	Hybrid Issuers	White-Label Issuers
Submit the latest CMS Business Requirements Audit to the SBE during ORR annually to verify ongoing CMS certification. Refer to <a href="#">Section 2.5.1.1 Annual Compliance Audit Documentation</a> for more details.	Yes	Yes	Yes	No
Submit signed CMS Business Agreement annually within 10 days of CMS signature to verify ongoing CMS certification.	Yes	Yes	Yes	Yes



Requirement	Applicable to:			
	Primary EDE Entities	Hybrid Non-Issuers	Hybrid Issuers	White-Label Issuers
Maintain compliance with CMS business requirements outlined in CMS zONE (Opportunity to Network and Engage), except where the SBE has given guidance or approval for modifications.	Yes	Yes	Yes	Yes
Maintain certification as an FFE EDE entity for PY 2025.	Yes	Yes	Yes	Yes
Incorporate CMS-required modifications into the Georgia Access platform and inform the SBE when testing has been completed and will go live with production data.	Yes	Yes	Yes	Yes
Provide a toll-free customer support line for consumers to receive assistance with selecting and enrolling in a health plan, updating consumer information, creating consumer accounts, troubleshooting issues, completing identity proofing, and answering consumer questions related to notices, eligibility, enrollment, and Data Matching Issues/SEP Verification Issues. Provide an agent support line for agents offering an agent portal.	Web brokers only	Yes	Yes	Yes
Develop, submit, and implement a robust consumer support process, including having a staffing and operational plan in place to support and help consumers.	Web brokers only	Yes	Yes	Yes
Provide a single, streamlined application (SSApp) as defined by 45 CFR 155.405 and approved by CMS except where the SBE has required modifications.	Yes	No	No	No
Follow the Georgia Access optional change request process outlined in the <i>PY 2025 EDE Partner Application</i> . if the entity deviates from their CMS-approved EDE user interface (UI)/QHP application and makes Georgia Access-specific changes to either their UI/QHP application, phase, or display of non-QHPs.	Yes	Yes	Yes	No

Requirement	Applicable to:			
	Primary EDE Entities	Hybrid Non-Issuers	Hybrid Issuers	White-Label Issuers
Display and facilitate enrollment in all Georgia Access QHPs, Catastrophic plans, and SADPs (if noted in the organization’s application that the organization supports SADP functionality) available to consumers within respective Georgia counties.	Yes	No	No	No
Display and sell all of their own Georgia Access QHPs, Catastrophic plans, and SADPs available to consumers within applicable Georgia counties.	No	No	Yes	Yes
Adhere to <i>Georgia Access EDE Partner Marketing Guidelines for OE 2025</i> as established by the SBE and provided to web brokers and insurance companies.	Web brokers only	Yes	Yes	Yes
Prohibit QHP advertising, or otherwise providing favored or “preferred placement,” in the display of QHPs, on web broker and insurance company websites based on the compensation an agent or web broker receives from QHP insurance companies.	Yes	Yes	Yes	Yes
Prohibit displaying plan recommendations to consumers on web broker and insurance company websites based on compensation an agent or web broker receives from QHP insurance companies.	Yes	Yes	Yes	Yes
Accept appointments with all certified Georgia Access web brokers to enable consumers to select and enroll in QHPs, Catastrophic plans, and SADPs.	No	No	Yes	Yes
Establish appointments with all certified QHP and SADP insurance companies to enable consumers to select and enroll in QHPs, Catastrophic plans, and SADPs.	Web brokers only	Yes	No	No
Provide the same disability support services for Georgia Access as is required by the FFE today for FFE EDE entities, web brokers, and insurance companies under 45 CFR 155.205.	Yes	Yes	Yes	Yes
Provide the same language support services for Georgia Access as is required by the FFE today for web brokers and insurance companies under 45 CFR 155.205.	Yes	Yes	Yes	Yes

Requirement	Applicable to:			
	Primary EDE Entities	Hybrid Non-Issuers	Hybrid Issuers	White-Label Issuers
Provide website content and UI/QHP application in Spanish consistent with the requirements outlined in 45 CFR 155.205. Georgia's Spanish-speaking Limited English Proficient (LEP) population does not currently meet the federal 10% population threshold for Spanish translation requirements. However, Georgia Access requires EDE Partners to comply with current federal regulations as though Georgia's Spanish-speaking LEP population were 10%.	Yes	No	No	No
Confirm that their primary entity provides their UI/QHP application in Spanish consistent with the requirement outlined in 45 CFR 155.205.	No	Yes	Yes	Yes
Confirm that their primary entity provides website content in Spanish consistent with the requirements outlined in 45 CFR 155.205.	No	Yes	Yes	Yes
Do not assess fees on consumers to use their platform to shop for and enroll in QHPs.	Web brokers only	Yes	Yes	Yes
Participate in ongoing Georgia Access program, technical, and operational discussions with the SBE (e.g., discuss updates, raise issues, and provide feedback).	Yes	Yes	Yes	Yes
Actively resolve all issues identified through State audits.	Yes	Yes	Yes	Yes
Provide monthly reports on consumer support metrics, as defined by the SBE.	Yes	Yes	Yes	Yes
Provide monthly reports on website traffic, as defined by the SBE.	Yes	Yes	Yes	Yes
Enter into written agreements with any downstream entities that use a white-label version of the organization's EDE platform to ensure downstream entity compliance with all privacy and security requirements. Provide the State with a complete list of downstream entities with whom the organization maintains written agreements during ORR and upon request.	Yes	No	No	No

Requirement	Applicable to:			
	Primary EDE Entities	Hybrid Non-Issuers	Hybrid Issuers	White-Label Issuers
Verify that all agents using the entity's agent portal are certified by Georgia Access and licensed by OCI to operate in Georgia (if entity offers an agent portal for use by captive or independent agents).	Yes	Yes	Yes	Yes

**2.1.2.2 Technical Integration and Testing Requirements**

The following table lists all technical integration and testing requirements and their applicability to primary EDE entities, hybrid non-issuers, hybrid issuers, and white-label issuers.

Requirement	Applicable to:			
	Primary EDE Entities	Hybrid Non-Issuers	Hybrid Issuers	White-Label Issuers
Implement the full Georgia Access Application Programming Interface (API) suite and complete API technical integration.	Yes	No	No	No
Complete test cases identified by Georgia Access and provide consistent eligibility determination scenarios covered by the EDE Partner applicant's certified EDE phase specified in the <i>Georgia Access API Testing Guide</i> .	Yes	No	No	No
Complete EDE and insurance company end-to-end testing.	Yes	No	No	No
Resolve any issues identified during blind audits before OE 2025.	Yes	No	No	No
Track agent and consumer interactions within its EDE Partner environment, as applicable, with consumer applications using a unique identifier for each individual.	Yes	No	No	No
Provide, either directly, through agents or through the primary entity, manual ID Proofing (IDP) for consumers by reviewing and validating consumer ID documentation when the Remote Identity Proofing (RIDP) service is not used or is unavailable.	Web brokers only	Yes	Yes	Yes
Provide entity profile (i.e., logo, contact information, shopping URL, and customer support information) for display to the public for Georgia Access website and notices.	Web brokers only	Yes	Yes	Yes

Requirement	Applicable to:			
	Primary EDE Entities	Hybrid Non-Issuers	Hybrid Issuers	White-Label Issuers
Notify the SBE of any updates or changes to the entity’s information.	Yes	Yes	Yes	Yes
Provide a defined, State-approved technical procedure for handling, processing, or referring complex consumer cases.	Yes (Phase 2 EDE Partners only)	No	No	No
Participate in ORRs with Georgia Access. Reference <a href="#">Section 2.2.2.5 Operational Readiness Reviews</a> for more details on the ORR process.	Yes	Yes	Yes	Yes

### 2.1.2.3 Consumer Application Requirements

EDE Partners must provide a SApp that meets the requirements outlined in the *Georgia Access UI Question Companion Guide*, which is based on the *CCIIO UI Question Companion Guide* with Georgia Access-specific changes. Refer to [Section 2.2.2.2 Georgia Access User Interface \(UI\) Question Companion Guide](#) for more details on the differences between the Georgia Access and CCIIO UI Question Companion Guides.

The following table lists all UI/QHP application change requirements and their applicability to primary EDE entities, hybrid non-issuers, hybrid issuers, and white-label issuers.

Requirement	Applicable to:			
	Primary EDE Entities	Hybrid Non-Issuers	Hybrid Issuers	White-Label Issuers
Meet the Georgia Access UI and QHP application requirements established by the SBE and detailed within the latest <i>Georgia Access UI Question Companion Guide</i> and <i>Georgia Access Communications Toolkit</i> .	Yes	No	No	No
<b>For Upstream Entities:</b> Confirm that the primary entity meets the Georgia Access UI and QHP application requirements established by the SBE and detailed within the latest <i>Georgia Access UI Companion Guide</i> and <i>Georgia Access Communications Toolkit</i> .	No	Yes	Yes	Yes

### 2.1.2.4 Privacy & Security Requirements

The following table lists all privacy and security requirements and their applicability to primary EDE entities, hybrid non-issuers, hybrid issuers, and white-label issuers.

Requirement	Applicable to:			
	Primary EDE Entities	Hybrid Non-Issuers	Hybrid Issuers	White-Label Issuers
Sign an SBE Business Associate Agreement (BAA) with the SBE for data sharing and systems integration.	Yes	Yes	Yes	Yes
Remain in compliance with all CMS EDE privacy and security requirements.	Yes	Yes	Yes	No
Implement the exact same privacy and security controls for CMS environments and infrastructure to all Georgia Access environments and infrastructure.	Yes	Yes	Yes	No
Provide requested privacy and security documentation as outlined in the <i>Georgia Access Audit Materials Guide</i> that is provided to all entities as part of the Georgia Access ORR Materials.	Yes	Yes	Yes	No
Provide additional information as requested to the State to demonstrate compliance with privacy and security standards and resolution of issues on Georgia Access environments.	Yes	Yes	Yes	No
Notify the SBE point of contact (POC) when a security or privacy incident has been identified, provide timely updates on incidents throughout the EDE's defined incident response plan and upon resolution.	Yes	Yes (if relevant)	Yes (if relevant)	No
Maintain a testing environment that accurately represents the Georgia Access production environment and integration with the Georgia Access Eligibility System.	Yes	Yes	Yes	Yes
Monitor ongoing activity and report suspicious or fraudulent activity to the SBE following SBE processes.	Yes	Yes	Yes	Yes

## 2.2 Initial Application and Certification

This section outlines the policies for initial EDE Partner certification in Georgia Access.

### 2.2.1 EDE Partner Application Release and Acceptance

#### 2.2.1.1 Initial Application Release

The first step to participate in Georgia Access is the submission of an EDE Partner application to Georgia Access. The EDE Partner application:

- Serves as an indication to Georgia Access that the applicant intends to seek certification as an EDE Partner for the upcoming OE Period.

- Is a non-binding document that does not guarantee EDE Partner approval or certification. The applicant or the SBE may delay or end the applicant's participation in the certification process at any point prior to certification (refer to [Section 2.4.4 EDE Partner-Initiated Delay](#) and [Section 2.4.5 EDE Partner-Initiated Withdrawal](#) for more details). Failure to submit required information as directed, participate in technology and/or program sessions, or successfully pass ORRs may result in certification delay or denial.

Each year, Georgia Access posts the latest EDE Partner application on the Georgia Access website and distributes it via the following methods:

- Posting FAQs regarding the EDE Partner application.
- Sending the EDE Partner application to potential participants.

While the application is open year-round, EDE Partner participation for specific plan years is determined by the date of application submission and certification progress. Georgia Access communicates the application deadlines for participation in specific plan years annually.

#### **2.2.1.2 Application Materials**

Prospective EDE Partner applicants must submit an EDE Partner application and additional documentation attesting to their compliance with program, technical integration and testing, consumer application, and privacy and security requirements.

Each EDE Partner type has its own required application materials:

- Primary EDE Entity
  - *Attachment 1: Primary EDE Application*
  - Copy of the most recent *CMS Interconnectivity Security Agreement (ISA)*
  - Copy of the most recent *CMS Quarterly Plan of Actions and Milestones (POA&M)*
- Hybrid Non-Issuer
  - *Attachment 2: Hybrid Non-Issuer Application*
  - Copy of the most recent *CMS Quarterly POA&M*
- Hybrid Issuer
  - *Attachment 3: Hybrid Issuer Application*
  - Copy of the most recent *CMS Quarterly POA&M*
- White-Label Issuer
  - *Attachment 4: White-Label Issuer Application*

#### **2.2.1.3 Application Submission**

To participate in the upcoming plan year, EDE Partner applicants must submit their completed EDE Partner application to Georgia Access by the designated due date communicated by Georgia Access. Late submissions may be considered for approval and participation on a rolling basis.

#### **2.2.1.4 Application Acceptance**

EDE Partner applicants with complete applications receive an acceptance letter within one week of submission outlining next steps and identifying who their POC will be throughout the certification process. If Georgia Access deems an EDE Partner application incomplete, the EDE Partner applicant receives a request for additional information, and if required, an application denial letter.

## 2.2.2 Initial Certification Process

### 2.2.2.1 Ongoing Coordination

Once Georgia Access confirms that an EDE Partner applicant's application has been accepted, the entity is referred to as an EDE Partner applicant until certification is granted. For the period when Georgia Access is transitioning from an SBE-FP to an SBE, EDE Partner applicants are required to:

- Participate in ongoing technology design review sessions throughout Georgia Access planning, implementation, and go-live.
- Participate in monthly program design review sessions with Georgia Access.
- **For Primary EDE Entities:** Provide a demonstration of their consumer application to Georgia Access upon request.
- Engage in one-on-one meetings with Georgia Access as needed.
- Complete and pass an ORR.

### 2.2.2.2 Georgia Access User Interface (UI) Question Companion Guide

Georgia Access annually releases a *Georgia Access UI Question Companion Guide* and *Georgia Access Communications Toolkit* based on the *CCIIO UI Question Companion Guide*. These materials are shared directly with the EDE Partner applicants. Georgia Access may release additional versions of the *Georgia Access UI Question Companion Guide* as CCIIO releases periodic updates to the *CCIIO UI Question Companion Guide*.

### 2.2.2.3 Georgia Access Phase Certification

Georgia Access reviews and certifies EDE Partner applicants at their current FFE EDE certification phase. For example, an EDE Partner applicant that is currently certified as an FFE Phase 2 EDE is reviewed and considered for Georgia Access certification as a Phase 2 EDE Partner. For a list of consumer enrollment scenarios supported at each phase, refer to [Section 2.1.1.2 Georgia Access EDE Partner Certification Phases](#). EDE Partner applicants requesting certification for Phases 2 must provide specific details to Georgia Access regarding how they will support consumer enrollment scenarios beyond their current phase, including establishing a relationship with a Phase 3 EDE Partner to hand consumers off if not handing them off to the Georgia Access Portal.

Applicants may concurrently pursue a higher FFE EDE certification phase at the time they submit their Georgia Access EDE Partner application. Georgia Access will consider the pending EDE phase for EDE Partners that are applying for a higher EDE certification on the FFE.

For EDE Partner applicants seeking to be certified at a different phase for Georgia Access than their current FFE EDE certification phase, refer to [Section 2.3.1.3 Phase Change Requests](#).

### 2.2.2.4 Georgia Access Optional Change Requests

EDE Partner applicants seeking certification as primary entities may not request any optional changes to their 2025 UI or QHP consumer application, certification for an enhanced phase for Georgia Access, or platform and security changes. For the change request process for OE 2026 and beyond, refer to [Section 2.3.1.2 Optional Change Requests](#).

### 2.2.2.5 Operational Readiness Reviews

Georgia Access engages with EDE Partner applicants throughout the certification process to monitor progress and compliance. Georgia Access schedules an ORR with each EDE Partner applicant prior to OE to assess whether each EDE Partner applicant has met all Georgia Access requirements and milestones for certification.



Prior to each EDE Partner applicant's ORR, Georgia Access distributes the following materials.

- *Georgia Access ORR Packet*: Provides an overview of the ORR process, review timeline, and required documentation.
- *Georgia Access ORR Checklist*: Outlines the full list of EDE Partner requirements.
- *Georgia Access Readiness Verification Form*: Includes attestation of Georgia Access requirements and open-ended questions.
- *Georgia Access QHP Application UI Compliance Checklist*: Outlines the required screenshots entities must provide to verify compliance with UI or QHP application requirements.
- *Georgia Access Audit Materials Guide*: Outlines the required audit and privacy and security documentation that entities must provide.

In advance of an EDE Partner applicant's ORR, the applicant must submit the completed ORR checklist and required documentation. Georgia Access may request additional information, as needed.

For minor discrepancies during ORR, the EDE Partner applicant has the opportunity to submit any missing items or correct any outstanding issues within ten business days to receive certification in advance of the upcoming OE Period. If discrepancies are considered significant, the EDE Partner applicant may not receive certification in time for the upcoming OE Period.

Once EDE Partner applicants receive certification, they may commence marketing and outreach efforts to Georgia consumers in adherence with *Georgia Access EDE Partner Marketing Guidelines for OE 2025*.<sup>1</sup>

#### 2.2.2.6 EDE Partner Certification

Georgia Access notifies EDE Partner applicants that have successfully completed and passed ORRs that they are certified as a Georgia Access EDE Partner. The EDE Partner applicant must acknowledge the notification to confirm certification for the upcoming plan year.

Certified EDE Partners receive:

- A certificate indicating EDE Partner certification for the designated plan year.
- Approval to start marketing to consumers.

The Georgia Access website displays all certified EDE Partners for the upcoming plan year ahead of OE. EDE Partners that are not certified in time for OE participation are added to the Georgia Access website based on their go-live date.

- EDE Partners that are certified to go live for the upcoming OE are displayed on the Georgia Access website at least one month prior to OE.
- EDE Partners that are certified midyear to begin supporting consumers during SEPs are displayed on the Georgia Access website on a go-live date agreed upon between the EDE Partner and Georgia Access.

#### 2.2.3 Failure to Meet Certification Requirements

If an EDE Partner applicant is at risk of failing to meet requirements or milestones during the certification process, Georgia Access:

- Provides a *Notice of Risk for Noncompliance* to the EDE Partner applicant.

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<sup>1</sup> Insurance companies may not market specific plan information until receiving QHP certification for their plans.

- Works with the EDE Partner applicant to identify a corrective action plan.

If the EDE Partner applicant fails to meet key requirements or milestones, Georgia Access:

- Provides a written *Notice of Noncompliance* indicating to the EDE Partner which certification milestones it has not met and potential impact on certification and go-live.
- Requests a remediation plan from the EDE Partner applicant.
- Meets with the EDE Partner applicant to review and confirm remediation plan.

If Georgia Access determines that the EDE Partner applicant may need to delay certification and go-live until requirements have been met, Georgia Access schedules a meeting to review circumstances with the EDE Partner applicant and discuss what actions are needed. If a certification delay is deemed necessary, Georgia Access:

- Sends the EDE Partner applicant a *Notice of Certification Delay*.
- Works with the EDE Partner applicant to identify a new go-live date.
- Provides a list of next steps and requirements for certification.

#### 2.2.4 EDE Partner Applicant-Initiated Delay

An EDE Partner applicant must notify Georgia Access if they wish to delay initial certification. Upon receipt of this notification, Georgia Access schedules a meeting to review circumstances with the EDE Partner applicant and discuss what actions are needed.

If the EDE Partner applicant elects to delay certification, Georgia Access:

- Sends an email to the EDE Partner applicant's designated POC confirming the EDE Partner applicant plans to delay certification.
- Works with the EDE Partner applicant to identify a new certification and go-live date.
- Provides next steps for the EDE Partner.

#### 2.2.5 EDE Partner Applicant-Initiated Withdrawal

An EDE Partner applicant must notify Georgia Access if they wish to withdraw from initial certification. Upon receipt of this notification, Georgia Access schedules a meeting to review circumstances with the EDE Partner and discuss what actions may be needed.

If the EDE Partner applicant elects to withdraw from the certification process, Georgia Access:

- Sends an email to the EDE Partner applicant's designated POC confirming the EDE Partner applicant plans to withdraw from the certification process.
- Removes the entity from upcoming program and technical sessions.

### 2.3 Ongoing Requirements and Policies

This section outlines the additional and ongoing requirements for certified EDE Partners to participate in Georgia Access and the policies for Georgia Access to manage EDE Partners. Georgia Access requires certified EDE Partners to:

- Provide written requests for optional changes to consumer applications mid-certification year.
- Participate in ongoing program sessions as necessary.
- Participate in technical sessions as necessary.
- Provide consumer engagement reporting.
- Provide written request for changes to certification status mid-certification year.

## 2.3.1 Change Control Policy

### 2.3.1.1 Georgia Access Required Changes

Georgia Access distributes an updated version of the *Georgia Access UI Question Companion Guide* and *Georgia Access Communications Toolkit* annually to outline required changes that EDE Partners must implement.

### 2.3.1.2 Optional Change Requests

Primary EDE entities may request optional changes to their UI or QHP consumer application, or platform and security changes at any time during the plan year after OE 2025. Upstream EDE entities are only required to submit an optional change request if they plan to make changes to their primary entity's platform and/or QHP consumer application.

Georgia Access's Change Review Committee (CRC) issues decisions on optional change requests to EDE Partners or EDE Partner applicants on an ongoing basis. Optional change request decisions are made at the CRC's sole discretion, are final, and may not be appealed. Refer to [Section 2.3.1.4 Change Review Committee \(CRC\)](#) for more details on the optional change request review process.

Georgia Access publishes information about requesting optional changes, including the types of optional changes that EDE Partners or EDE Partner applicants may request as well as documentation required to facilitate a review of the request, in the *PY 2025 Georgia Access EDE Partner Application*. EDE Partners or EDE Partner applicants requesting optional changes must submit at least the following information to Georgia Access:

- *Georgia Access Optional Change Request Notification Form*, notifying the SBE of the EDE Partner's or EDE Partner applicant's intent to request an optional change.
- *Georgia Access Optional Change Request Form*, including a detailed technical description of the change and screenshots of any changes to front-end UI.
- *Business Impact Analysis (BIA)*, denoting any effects of the requested change on the EDE Partner's or EDE Partner applicant's mission, business processes, and system supports.
- *Security Impact Analysis (SIA)*, denoting any effects of the requested change on the security posture of the system.

Requested UI and QHP consumer application changes will be approved as long as they:

- Do not complicate the enrollment process for consumers.
- Do not materially impact eligibility results.
- Follow the *Georgia Access EDE Partner Marketing Guidelines* for the applicable plan year.
- Can be accommodated within the testing timeline with Georgia Access for go-live.

#### 2.3.1.2.1 Optional Change Request Reviews

The CRC will determine whether to approve or deny the change request. Georgia Access notifies the EDE Partner applicant of the CRC's decision within two business days of the decision being made.

Refer to [Section 2.3.1.4 Change Review Committee \(CRC\)](#) for more details on the optional change request review and approval process.

### 2.3.1.3 Phase Change Requests

Phase 2 EDE Partners may request to change their Georgia Access EDE phase at any time during the plan year after OE 2025. To initiate a phase change request, Phase 2 EDE Partners must declare intent to change phases by updating their EDE Partner application and notifying Georgia Access. EDE Partners

must provide test and use cases for selected phase functionality and conduct integration testing with Georgia Access.

If an EDE Partner requesting a phase change meets all requirements of the selected phase and completes and passes an ORR, Georgia Access certifies the EDE Partner at the selected phase for the upcoming OE Period. All EDE's will need to be certified at Phase 3 for Georgia Access PY2026.

Refer to [Section 2.2.2.3 Georgia Access Phase Certification](#) for more details about EDE certification phases for Georgia Access and [Section 2.1.1.2 Georgia Access EDE Partner Certification Phases](#) for a list of consumer enrollment scenarios supported at each EDE phase.

#### 2.3.1.4 Change Review Committee (CRC)

The CRC convenes to approve or deny all change requests for implementation for the upcoming OE Period. EDE Partner applicants submit the *Change Request Form* that is in the *Appendix* of the *Georgia Access EDE Partner Application*. If needed, Georgia Access requests additional information from the EDE Partner or EDE Partner applicant on behalf of the CRC.

The CRC assesses change requests according to the following approval parameters and votes on whether to approve, conditionally approve, or deny the change request:

- Has the EDE Partner provided a clear explanation of what the change is for Georgia Access and how it differs from its FFE EDE application?
- Has the EDE Partner provided clear justification for how the optional change enhances the consumer experience?
- Is there potential risk that the change creates consumer confusion or negatively impacts eligibility and enrollment information?
- Are there impacts to infrastructure, security, or privacy? Are any audits required?
- Are there other identified risks?
- Does the change require additional testing with the Georgia Access Eligibility System APIs?
- Does the change require additional testing and auditing of the EDE Partner UI/QHP consumer application?
- Is the EDE Partner currently in the process of getting approval from CCIIO for a change to their FFE EDE entity application that they also want to incorporate for Georgia Access?
- Does the change comply with the *Georgia Access EDE Partner Marketing Guidelines* for the applicable plan year?

### 2.3.2 EDE Partner Reporting

For Georgia Access to monitor OE activity and assess marketing and public outreach needs, EDE Partners must report enrollment and consumer support metrics through the *Georgia Access EDE Partner Reporting Templates*. EDE Partner reports are due to Georgia Access on a weekly basis during OE and monthly outside of OE.

#### 2.3.2.1 Required Reports

The table below outlines the key reporting metrics included in the *Georgia Access EDE Partner Reporting Templates* provided to EDE Partners during ORR each year. Note that Georgia Access may add to or change required reporting metrics from year to year as the Exchange sees fit. EDE Partner reports are due to Georgia Access on a weekly basis during OE and monthly outside of OE. Primary entities must use the EDE Partner reporting template to report on website activity. Upstream entities can self-report or delegate the associated technology provider to submit on their behalf. Failure to submit these reports in

a timely manner will result in a non-compliance violation with outlined requirements for the EDE Partner.

Reporting Category	Description
Website	<ul style="list-style-type: none"> <li>• Number of consumers who visited the EDE Partner website</li> <li>• Number of consumers who started an application</li> <li>• Percent uptime for website availability</li> </ul>
Consumer Support Metrics	<ul style="list-style-type: none"> <li>• Number of consumer inquiries received</li> <li>• Number of consumer inquiries disposed and pending</li> <li>• Number of language/accessibility requests</li> <li>• Number of consumer inquiries escalated</li> <li>• Consumer satisfaction/experience</li> </ul>

### 2.3.3 Marketing and Consumer Education

Certified EDE Partners may conduct marketing and consumer education activities for Georgia Access. EDE Partners must complete ORRs, receive certification, and have all marketing materials reviewed and approved by Georgia Access before receiving permission to market and conduct consumer outreach.

Refer to the *Georgia Access EDE Partner Marketing Guidelines for OE 2025* or more details on EDE Partner marketing guidelines.

### 2.3.4 EDE Partner-Initiated Withdrawal of Certification

As part of the certification process, an EDE Partner must agree to participate in Georgia Access for the entirety of the plan year per the signed EDE Partner Certification Agreement with Georgia Access. There are circumstances, however, in which an EDE Partner is not able to continue to participate in Georgia Access and must request a certification withdrawal. Allowable reasons include:

- Bankruptcy
- Merger or acquisition of a company
- Security breaches or risks

If a certified EDE Partner can no longer participate in Georgia Access, the EDE Partner must submit a *Withdrawal Notice* to Georgia Access.

## 2.4 Annual Recertification

This section outlines the policies for annual EDE Partner recertification in Georgia Access. Recertification follows a similar process and timeline as initial certification. If the certified EDE Partner does not make changes to the consumer application or operations for the following year, they have an abbreviated recertification process and ORR. If the certified EDE Partner requests to make changes to their application or certification phase, they must undergo additional review and testing. Georgia Access will assume that all certified EDE Partners are seeking recertification for the following plan year unless a certified EDE Partner formally notifies Georgia Access that it does not plan to seek recertification.

### 2.4.1.1 Ongoing Coordination

Certified EDE Partners must complete all technical activities and milestones and complete and pass an ORR prior to receiving recertification. The following activities are required:

- Meet technology specifications and deadlines for integration and testing, only if the State requires new API and technology changes.
- Participate in program sessions.
- Engage in one-on-one meetings with Georgia Access as necessary.

Failure to submit required information as directed, participate in technology and/or program sessions, or successfully pass ORRs may result in certification delay or denial.

#### 2.4.1.2 Communication

After Georgia Access notifies the EDE Partner that their EDE Partner recertification application has been accepted, Georgia Access identifies a designated POC within the SBE for answering any program or technology questions about recertification and coordinating meetings. The POC:

- Sends a confirmation acknowledging receipt of all EDE Partner recertification questions and requests within three business days.
- Assesses urgency of question or issue raised.
- Responds to submitted questions or issues within 12 business days, depending on the urgency of the request.

#### 2.4.1.3 Recertification Operational Readiness Review

ORR for recertification is a streamlined version of the ORR process for certification during the initial year. Georgia Access uses ORRs for recertification to verify that the EDE Partner complies with any new requirements and has implemented any Georgia Access-initiated change requests. Refer to [Section 2.2.2.5 Operational Readiness Reviews](#) for more details on the ORR process. If an EDE Partner attests that nothing has changed from the previous year, then ORR requirements may be simplified.

#### 2.4.1.4 EDE Partner Certification

##### 2.4.1.4.1 EDE Partner Certification Agreement

The SBE provides a Georgia Access EDE Partner Recertification Agreement to EDE Partners who have successfully completed ORR for recertification for the upcoming plan year. The Georgia Access EDE Partner Recertification Agreement features similar terms to the initial certification agreement.

##### 2.4.1.4.2 Post EDE Partner Certification

Once EDE Partners sign and execute the Georgia Access EDE Partner Recertification Agreement, Georgia Access provides a certificate indicating EDE Partner certification for the upcoming plan year. Georgia Access also updates the list of certified EDE Partners on the Georgia Access website in alignment with the go-live dates, outlined in [Section 2.2.2.6 EDE Partner Certification](#).

#### 2.4.2 Failure to Meet Recertification Requirements

If an EDE Partner is at risk of failing to meet requirements or milestones during the recertification process, Georgia Access:

- Provides *Notice of Risk for Noncompliance* to the EDE Partner.
- Works with the EDE Partner to develop a mitigation strategy.

If an EDE Partner fails to meet a requirement or milestone, Georgia Access:

- Provides written *Notice of Noncompliance* indicating which certification milestones have not been met and the potential impact on certification and go-live.
- Requests a remediation plan from the EDE Partner.
- Meets with the EDE Partner to review and confirm remediation plan.

If Georgia Access determines that an EDE Partner may need to delay recertification until requirements have been met, Georgia Access schedules a meeting to review circumstances with the EDE Partner and discuss what actions are needed. If recertification is delayed, Georgia Access:

- Sends the EDE Partner a *Notice of Recertification Delay*.
- Works with the EDE Partner to identify if go-live approval for the upcoming OE is still possible, and if not, a new go-live date.
- Provides a list of next steps and requirements for recertification.

Georgia Access annually sets dates by which EDE Partners must resolve any outstanding compliance necessary for recertification. If they do not meet that deadline, the EDE Partner is not recertified for the upcoming OE. EDE Partners may request an extension due to extenuating circumstances. Those extensions are evaluated on a case-by-case basis.

If the EDE Partner elects to withdraw from the recertification request, Georgia Access:

- Provides a *Withdrawal Request Form* to the EDE Partner for completion.
- Acknowledges receipt of withdrawal request.
- Works with the EDE Partner to develop a transition plan for consumers.

### 2.4.3 EDE Partner-Initiated Delay

Delay of EDE Partner recertification follows the same process as initial certification as detailed in [Section 2.2.4 EDE Partner-Initiated Delay](#).

### 2.4.4 EDE Partner-Initiated Withdrawal

Withdrawal of or delay of recertification follows the same process as initial certification as detailed in [Section 2.2.5 EDE Partner-Initiated Withdrawal](#).

### 2.4.5 Intent Not to Recertify

Certified EDE Partners who choose not to seek recertification for the next plan year do not need to submit an EDE Partner application for recertification.

### 2.4.6 Consumer Transition Plan for EDE Partners Not Recertified

If an EDE Partner is not recertified for the upcoming plan year, or if their recertification is delayed so that they are not able to go live for the upcoming OE, Georgia Access works with the EDE Partner to minimize potential impact on consumers.

## 2.5 EDE Partner Compliance Monitoring and Violations

This section outlines the policies for monitoring EDE Partner compliance with SBE requirements post-certification. Certified EDE Partners are required to maintain compliance with Georgia Access and CCIO standards. Georgia Access may issue a *Notice of Noncompliance*, temporarily suspend, or decertify an EDE Partner who is non-compliant.

### 2.5.1 Compliance Audits

#### 2.5.1.1 Annual Compliance Audit Documentation

EDE Partners are required to complete annual audits and submit the associated documentation to Georgia Access to remain compliant with Georgia Access requirements and federal regulations (45 CFR 155.280).

Georgia Access does not require EDE Partner applicants to undergo separate, Georgia Access-specific audits for the State's first year as an SBE (i.e., PY 2025). For PY 2025, Georgia Access will instead verify that EDE Partners are in compliance with their latest CMS audit.

In future years, primary EDE entities must submit updated CMS Privacy and Security Audit and CMS Business Requirements Audit documentation within ten days of receiving CMS approval. Georgia Access requires that EDE Partners provide the latest documentation. If a primary entity undergoes any changes that trigger a new CMS audit, the primary entity must notify Georgia Access prior to undergoing the change and submit any new audit documentation to Georgia Access within five days of receiving CMS approval on the new audit.

Primary entities, hybrid issuers, and hybrid non-issuers must submit an updated audit for any optional change requests beyond minor UI, consumer application, or branding changes. Refer to [Section 2.3.1.2 Optional Change Requests](#) for more details on the optional change request process.

#### **2.5.1.2 Review of Audit Documentation**

Primary EDE entities must submit monthly vulnerability scans and updated POA&M forms (if required) to Georgia Access as part of the Georgia Access privacy and security requirements. Georgia Access reviews the documentation within five days of receiving the forms and contacts EDE Partners if any concerns are identified in the review.

#### **2.5.1.3 Periodic Compliance Audits**

Georgia Access is responsible for routine monitoring of certified EDE Partners for compliance. Georgia Access reviews all certified EDE Partners at least once per quarter.

Georgia Access conducts periodic spot checks of certified EDE Partners, including for the following requirements:

- Website design/UI
- Consumer application
- Plan display
- Branding/marketing
- Consumer notices

#### **2.5.2 Complaint Investigation**

If Georgia Access conducts an investigation into an EDE Partner and finds that that EDE Partner is not in compliance, or has committed fraud, Georgia Access follows the process for suspension and/or decertification. Refer to [Section 2.5.4 Suspension](#) and [Section 2.5.5 Decertification](#) for more details.

#### **2.5.3 Finding of Noncompliance**

If Georgia Access identifies that a certified EDE Partner is not in compliance with the requirements, Georgia Access:

- Provides a *Notice of Noncompliance* to the EDE Partner, indicating which requirements were violated and outlining deadlines and requirements for a remediation plan.
- Receives, reviews, and approves the remediation plan from the EDE Partner.

#### **2.5.3.1 Ongoing Implementation Meetings and 1:1s**

After certification, EDE Partners are expected to continue participating in the monthly EDE implementation meetings and monthly (or semi-monthly) EDE Partner 1:1s (frequency depends on level of attention needed). These meetings cover program and technical updates; failure to adopt necessary program or operational changes results in a violation.



#### 2.5.4 Suspension

In the event the EDE Partner does not follow the remediation plan, or is nonresponsive to the Georgia Access *Notice of Noncompliance*, Georgia Access:

- Issues a *Final Warning Letter of Noncompliance* that includes a date for suspension from Georgia Access.
- Issues a *Letter of Suspension*, revokes access to Georgia Access APIs, and removes the EDE Partner from the Georgia Access website if the EDE Partner fails to take the appropriate remediation steps by the final deadline.
- Continues to hold the EDE Partner in suspended status until the issue is resolved.

##### 2.5.4.1 Suspension Prior to Go-Live

If an EDE Partner is suspended after certification but prior to its go-live date for consumer enrollment, Georgia Access:

- Instructs the EDE Partner to pause all marketing and outreach activities.
- Removes the EDE Partner from the Georgia Access website.
- Pauses all system and integration testing.

##### 2.5.4.2 Suspension After Go-Live but Prior to OE

If an EDE Partner is suspended after it has gone live to the public, but prior to the next OE, Georgia Access:

- Instructs the EDE Partner to pause all marketing and outreach activities.
- Removes the EDE Partner from the Georgia Access website.
- Prohibits any new enrollment or changes within SEPs.
- Allows the EDE Partner to continue to serve its currently enrolled consumers.
- Directs auto re-enrolled consumers to another affiliate with a different EDE Partner or the Georgia Access Portal if the suspension is not lifted prior to OE.

##### 2.5.4.3 Suspension During OE

If an EDE Partner is suspended during OE, Georgia Access:

- Instructs the EDE Partner to pause all marketing and outreach activities.
- Removes the EDE Partner from the Georgia Access website.
- Prohibits any new enrollment.
- Allows the EDE Partner to continue to serve its currently enrolled consumers.

#### 2.5.5 Decertification

In the event the suspended EDE Partner does not remedy the issue after being suspended, Georgia Access:

- Issues a *Final Warning Letter of Noncompliance* that includes a date for decertification from Georgia Access.
- Issues a letter of decertification and permanently revoke access to Georgia Access APIs.
- Notifies all Georgia consumers linked to the decertified EDE Partner of the change and instructs them to make any updates/changes through another site.

Decertified EDE Partners will not be prohibited from applying to participate in Georgia Access in future years but will be required to start the EDE Partner application process over again and demonstrate ability to meet requirements prior to certification.

### 3 Insurance Company Policies

#### 3.1 Role of Insurance Companies in Georgia Access

In Georgia Access, insurance companies play a variety of roles in relation to plan management, back-end enrollment effectuation and reconciliation, and EDE processes. The table below provides a high-level overview of insurance company responsibilities related to each role, with additional details in the subsequent sections.

Role	Description	Applicable Section
Plan Management	Activities related to QHP application and certification, post-certification data changes, and SERFF submission and data transfers.	<a href="#">Section 3.2 Plan Management</a>
Enrollment Effectuation & Reconciliation	Activities related to premium payment processing 834 transaction files, enrollment effectuation after plan selection, and periodic enrollment reconciliation.	<a href="#">Section 3.3 Enrollment Effectuation &amp; Reconciliation</a>
EDE Partners	Activities related to an insurance company's role as an EDE Partner, facilitating enrollment in plans. Optional for insurance companies.	<a href="#">Section 2 EDE Partner Policies</a>

#### 3.2 Plan Management

As an SBE, Georgia Access is responsible for plan management functions. Plan management is the process of evaluating health plans to certify that they meet minimum standards, provide essential coverage, and maintain compliance to be sold on the Exchange.

The plan management functions that Georgia Access manages are outlined in the following sections. These sections apply to both QHP and SADP insurance companies.

##### 3.2.1 QHP Certification Preparation

Georgia Access, in coordination with OCI's Product Review Division, conducts several activities in preparation for the annual QHP certification period. Georgia Access releases the *QHP Application Instructions for Issuers* annually to outline the submission timeline, certification criteria, and submission instructions. The *QHP Application Instructions for Issuers* are posted to the Georgia Access website and the System for Electronic Rates & Forms Filing (SERFF).

Insurance companies submit their completed QHP application materials annually via SERFF based on the timeline and certification criteria developed.

##### 3.2.2 QHP Application Timeline

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.1010

Georgia Access has the authority to set its own QHP application timeline each plan year. This timeline is published in the annual *QHP Application Instructions for Issuers*.

##### 3.2.3 QHP Certification Criteria Development

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.1000

Georgia Access has the authority to set its own certification criteria each plan year, as long as the requirements comply with the minimum protections afforded in the ACA and other federal

requirements. Georgia Access publishes certification criteria and the associated review areas in the annual *QHP Application Instructions for Issuers*.

### 3.2.4 Required Application Materials

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.1010

Georgia Access has the authority to develop its own QHP application materials, use materials developed by CCIIO, or use a combination of both. Georgia Access leverages the *QHP Application Templates* and several of the supplemental forms released by CCIIO annually<sup>2</sup> to collect the majority of QHP application data from insurance companies. Multiple versions of each template may need to be submitted depending on the insurance company's plan designs (e.g., medical/dental, individual/SHOP).

Georgia Access publishes the list of application materials required for insurance companies to submit in the annual *QHP Application Instructions for Issuers*.

### 3.2.5 QHP Application Submission and Reviews

All insurance companies must demonstrate that their plans comply with the certification criteria set annually by Georgia Access, regardless of whether the plans were previously certified. Georgia Access, in coordination with OCI's Product Review Division, begins reviewing QHP application data against the established QHP certification criteria as soon as materials are submitted and no later than the day after the State's initial submission deadline.

#### 3.2.5.1 Application Submission System

Insurance companies submit their QHP applications via SERFF; SERFF is configured to collect a standard set of CCIIO templates, and its functionality is customizable for each State based on their application requirements. The Georgia Access Portal is connected with SERFF to receive and manage approved QHP application data for plan display.

#### 3.2.5.2 QHP Application Reviews

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.1000

Georgia Access shares QHP review responsibility with OCI's Product Review Division. The Product Review Division also conducts rate reviews and approves all rate-related application components and the associated forms. Georgia Access leverages the review tools that CMS publishes to conduct reviews where possible. Georgia Access communicates needed application corrections to insurance companies throughout the application process. Insurance companies must be responsive to these communications and correct their applications before the State's final application submission deadline.

### 3.2.6 QHP Certification & Plan Data Finalization

#### 3.2.6.1 Plan Certification Decisions

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.1000

Georgia Access sends Certification Notices containing plan certification decisions to issuers after reviews are final and before OE. All certification decisions made by Georgia Access during the QHP certification period for the upcoming plan year are final and insurance companies may not appeal the certification determination. Georgia Access reserves the right to identify and communicate plan data corrections prior to and after certification based on the original QHP application and any changes made to the application, or if the Product Review Division or Georgia Access determine that any of the submitted information is inaccurate.

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<sup>2</sup> The list of required materials is based on PY 2025 materials and may change for PY 2026 and subsequent years.

Georgia Access insurance companies are required to sign a BAA that outlines QHP certification-related legal obligations. The BAA does not take effect unless at least one plan is certified as a QHP for the plan year.

### 3.2.6.2 Plan Management Module

Georgia Access conducts a number of activities in the Plan Management Module before OE each plan year. These activities include plan validation, insurance company URL upload, plan crosswalk upload, and quality rating file upload.

Insurance companies are also required to conduct plan validation in the Plan Management Module before OE each plan year.

Details for these processes are included in the annual *QHP Application Instructions for Issuers*.

### 3.2.6.3 Public Use Files (PUFs)

Georgia Access is responsible for generating PUFs containing plan data. PUFs created and maintained by Georgia Access include Benefits and Cost Sharing, Rate, Plan Attributes, Business Rules, Service Area, Network, Plan ID Crosswalk, Machine-readable URL, and Quality Rating System (QRS).

These PUFs are published on the Georgia Access website and provided to the Georgia Access EDE Partners so that they can display the most recent plan data on their enrollment websites.

## 3.2.7 Data Changes and Plan Withdrawal

### 3.2.7.1 Data Changes

The approach for insurance companies making QHP application data changes depends upon where insurance companies are in the application submission and review process. The timeline for allowable data changes and the process for submitting changes are published in the annual *QHP Application Instructions for Issuers*.

Insurance companies that need to make plan data changes after data is certified are typically required to submit a data change request. The *Data Change Request Form* is posted to SERFF.

### 3.2.7.2 Plan Display Error Special Enrollment Periods

If an insurance company needs to make a data change after OE begins, the insurance company must include in its data change request the number of consumers enrolled in the affected plans and the impact to those consumers. If the impact is negative to consumers, the insurance company must determine if they would like to provide the affected consumers with a plan display error (PDE) SEP or if the insurance company will honor the benefit as it was displayed when the consumers enrolled.

PDEs may also be identified by consumers and/or the State. If this is the case, Georgia Access reviews to determine whether they agree there is an error, and if so, notifies the insurance company of the potential error and requests a data change request or a response explaining why the insurance company does not believe there is an error.

When insurance companies opt to honor the benefit as it was originally displayed, no additional action is needed after the plan data and PUFs are posted. Otherwise, Georgia Access works with insurance companies to provide consumers with a PDE SEP.

### 3.2.7.3 QHP Plan Withdrawal

Insurance companies can request to withdraw plans as needed before the final submission deadline for the upcoming plan year by uploading a Plan Withdrawal Request Form under the Supporting Documentation section in SERFF and notifying Georgia Access via email of the submission at

[planmanagement@georgiaaccess.ga.gov](mailto:planmanagement@georgiaaccess.ga.gov). Insurance companies can also change the status of SADPs to off-Exchange only.

Georgia Access provides a deadline each year by which insurance companies must notify the State of any plan withdrawal requests (typically late July/early August). Georgia Access reviews and approves/denies withdrawal requests on a case-by-case basis.

If an insurance company discontinues all QHPs in Georgia's individual health insurance market, the insurance company may not be permitted to return to offer plans for a period of five years beginning on the date of discontinuation of the last coverage not renewed.<sup>3</sup>

### 3.2.8 Oversight and Compliance

Georgia Access is responsible for monitoring all QHPs' compliance with certification standards for all insurance companies participating in Georgia Access, with coordination and consult from the Product Review Division. Georgia Access conducts two types of compliance reviews: complaint-driven reviews and ad hoc compliance reviews.

#### 3.2.8.1 Complaint-Driven Reviews

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.1010; 45 CFR 155.1200

Complaints can be filed formally through OCI's Consumer Services Division (non-discrimination and accessibility complaints) or OCI's Criminal Investigations Division (fraud, waste, and abuse complaints), or informally via various channels, including directly with the Product Review Division or Georgia Access Contact Center.

Georgia Access performs compliance reviews for any plan management-related complaints, regardless of how they're filed. Georgia Access reviews several data sources to decide on the path forward, which may include decertification or plan suppression. These data sources include, but are not limited to:

- Complaint data
- Insurance company self-reporting
- Insurance company policies, procedures, and operations
- Indicators of customer service and satisfaction
- Network adequacy analysis
- Eligibility and enrollment data

Georgia Access communicates next steps directly with the insurance company and informs all other appropriate governmental units of any ongoing compliance issues or investigations with insurance companies in Georgia Access.

#### 3.2.8.2 Ad hoc Compliance Reviews

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.1010; 45 CFR 155.1200

Georgia Access conducts ad hoc QHP compliance reviews on Georgia Access insurance companies. These reviews may be focused on a specific area or may review an insurance company's compliance with Georgia Access regulations. These reviews may be conducted randomly or may be in response to an external auditor's findings, Georgia Access Contact Center statistics, or other Georgia Access reports.

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<sup>3</sup> See [federalregister.gov](http://federalregister.gov) for more information.

Insurance companies agree to adhere to all QHP certification regulations in the BAAs they sign annually. These BAAs include agreement to cooperate with any compliance reviews conducted by Georgia Access.

### 3.2.8.3 Decertification

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.1080

If an insurance company is no longer in compliance with Georgia Access QHP certification requirements, Georgia Access may decertify one or more of the insurance company's plans. Decertification occurs after the plan has been certified by Georgia Access. If a plan is decertified, enrollees are granted an SEP to select a new plan. Decertification is a measure of last resort if all other corrective measures have been applied and have failed to resolve the compliance issue.

Georgia Access may decertify a plan for failure to comply with any QHP certification criteria, including, but not limited to, the following:

- Loss of valid insurance company license as issued by OCI
- Financial insolvency
- Loss of network providers so that the plan no longer meets the network adequacy standards for QHP certification

If an insurance company's plan is decertified, and the insurance company wishes to offer the plan again the following year, the insurance company follows the same certification process to be certified in the next year.

### 3.2.8.4 Decertification Appeals Policies

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.1080

Should a plan be decertified due to failure to comply with certification criteria, insurance companies may submit a written appeal within 15 calendar days to Georgia Access. Georgia Access reviews and notifies the insurance company of the appeal decision.

Insurers can file an appeal of the initial appeal decision to the OCI Administrative Procedure Division on GovLink. Appeals to the Administrative Procedure Division follow the procedure outlined in GA. R. and Regs. Section 120-2-2.

## 3.3 Enrollment Effectuation and Reconciliation

### 3.3.1 Premium Payments

#### 3.3.1.1 Initial Payment (aka "binder payment" or "binder")

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.400; 45 CFR 155.410; 45 CFR 155.420

Insurance companies may not effectuate a consumer's enrollment until the binder payment is paid. Insurance companies are permitted to implement a premium payment threshold policy, but binder payments commonly consist of the first month's full premium. Insurance companies can effectuate coverage once consumers have paid the initial premium within the payment threshold. Additional information about the premium payment threshold is in [Section 3.3.1.2 Premium Payment Threshold](#).

Insurance companies may set the deadline for consumers to pay their binder payment no earlier than the coverage effective date, and no later than 30 calendar days after the coverage effective date. During OE, coverage begins as stated in the *Georgia Access Policy Manual: Consumer Eligibility, Enrollment, and Support Policies*, found on the Georgia Access website. Ongoing payments after the initial binder payment are due by the last day of the month prior to the month of coverage.

When consumers are eligible for retroactive coverage, insurance companies should effectuate only a consumer's prospective coverage if the consumer pays only one month's premium by the premium deadline.

The insurance company must receive payment in full (or payment within the premium payment threshold) from the consumer for any applicable binder payment by the applicable binder payment deadline. Insurance companies may not grant grace periods for non-payment of the binder payment.

Insurance companies should not terminate/cancel enrollments based on billing or technical issues with their system. The first part of this (applicable to binder payments) was finalized in the 2024 NBPP, and the second part (applicable to all premium payments) was finalized in 2025.

### 3.3.1.2 Premium Payment Threshold

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.400(G)

Georgia Access Insurance Companies may implement a premium payment threshold policy for plans offered through Georgia Access. Insurance companies that implement such a policy typically consider a payment to be made in full once the consumer has paid the threshold amount established by the insurance company. The typical threshold amount is a percentage equal to or greater than 95%. An insurance company must maintain the premium payment threshold for the entirety of the plan year, and must apply the threshold policy consistently across all Georgia Access plans and consumers.

### 3.3.1.3 Grace Periods

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.430; 45 CFR 156.270(D); 45 CFR 156.270(G)

Insurance companies must grant consumers with effectuated coverage grace periods before terminating their coverage for non-payment. If the premium payment has not been received by the insurance company on or before the 30<sup>th</sup> day of the coverage month, a grace period is triggered.

Insurance companies must pay all appropriate claims for services rendered to consumers receiving APTCs during the first month of the grace period and may pend claims for services rendered to the consumer in the second and third months of the grace period. Insurance companies must notify providers of the possibility for denied claims when a consumer receiving APTCs is in the second and third months of the grace period.

Insurance companies can deny any claims that were pended for services received during the second and third months of the grace period if the consumer's coverage is terminated for non-payment of premiums retroactively to the last day of the first month of the grace period. However, insurance companies cannot retroactively deny claims from the first month of the grace period. Any premium payments received by an insurance company for coverage beyond the retroactive termination date are refunded to the consumer.

Further information on Georgia Access's policies related to grace periods and the payment of medical claims incurred during the grace period are detailed in the *Georgia Access Policy Manual: Consumer Eligibility, Enrollment, and Support Policies*, found on the Georgia Access website.

### 3.3.2 Disenrollment

ASSOCIATED FEDERAL REGULATION: 45 CFR 162.1501; 45 CFR 155.430

Insurance companies may disenroll consumers for non-payment. Consumers may voluntarily disenroll and set the date for the end of the current month, next month, or the following month. The disenrollment date is always the last day of the month unless the enrollment is due to death (in which case, disenrollment is one day after the date of death).

The Georgia Access Eligibility System may disenroll consumers who fail to provide required verifications by the specified deadline; these consumers should be disenrolled on the last day of the month following the deadline.

Updated termination dates on enrollments are only applied through insurance company or consumer requests and then escalated to the Georgia Access Contact Center. All requests for change in termination effective dates are processed based on limitations set forth in 45 CFR 155.430, regarding reasonable notice.

### 3.3.2.1 Reinstatement

Consumers may request reinstatement for cases of non-payment or insurance company error. In the case of insurance company error, insurance companies are allowed to reinstate coverage if the coverage termination date falls within the last 90 days. If the date is more than 90 days in the past, insurance companies are required to submit the consumer reinstatement request via the Georgia Access Contact Center for review and approval prior to reinstatement.

When the insurance company is allowed to reinstate coverage, they may activate coverage but must submit a ticket immediately to the Georgia Access Contact Center to ensure the consumer's eligibility is updated in the Georgia Access Eligibility System. The ticket must be submitted within two business days of processing the reinstatement.

Georgia Access does not reinstate coverage without a documented error or exceptional circumstance such as consumer error, system or agency error, natural disaster, or domestic abuse.

Further information on Georgia Access' policies related to reinstatement are detailed in the *Georgia Access Policy Manual: Consumer Eligibility, Enrollment, and Support Policies*, found on the Georgia Access website.

### 3.3.2.2 Re-Enrollment Following Termination for Non-Payment

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.400 (1)(iii); 45 CFR 147.104-5

Insurance companies may require the repayment of unpaid delinquent premiums due up to 12 months prior to effectuation of the new policy for consumers whose plans were previously terminated for non-payment of premiums. The insurance company may extend the binder payment deadline while the consumer makes payments on the delinquency. Insurance companies may terminate coverage for a consumer's failure to complete the repayment option with the insurance company.

### 3.3.3 Changes in Coverage Effective Dates

Changes in coverage effective dates are initiated by the Exchange, and issuers cannot change the coverage effective date without receiving a transaction from the state.

### 3.3.4 Enrollment Testing

Issuers are required to complete enrollment testing prior to going live on the Georgia Access platform. This section describes the EDI, RCNI, and PayNow testing included in this process. This testing is only required for the issuer's first year of go-live; in subsequent years, Enrollment Testing will only be completed if there are 834 or RCNI changes requiring new testing. Georgia Access will provide issuers the test plan, technical specifications, and testing timelines prior to initiating the testing phase.

#### 3.3.4.1 EDI Testing

Issuers are required to complete a set of 14-17 test cases to demonstrate their ability to send and receive 834, TA1, and 999 EDI transactions. Georgia Access will initiate each test case by transmitting an



834 initial enrollment file. Issuers will respond with a TA1, 999, and 834 as appropriate based on the test case. The timeline and exact transaction test cases are included in the Georgia Access Test Plan.

#### *3.3.4.2 RCNI Testing*

Issuers are required to complete RCNI Testing after the completion of the EDI 834 Testing. Issuers should maintain the test data from the EDI 834 test cases in their test environment. At the conclusion of 834 Testing, issuers will generate a test RCNI file inclusive of the data from the 834 test cases. The Georgia Access platform will return a discrepancy report based on this data.

#### *3.3.4.3 PayNow Testing*

Issuers who are implementing PayNow are required to complete PayNow testing. Issuers can configure their PayNow settings via self-service in their Issuer Portal and test the SAML transaction settings. Georgia Access will also transmit a test enrollment 834 and PayNow SAML transaction to complete this testing. The full details are included in the Georgia Access Testing Plan.

#### *3.3.4.4 Enrollment Reconciliation*

Issuers are required to submit an RCNI file monthly following the specifications provided by Georgia Access. The Georgia Access eligibility system will return a discrepancy report within 48 hours of submission of the RCNI file. Georgia Access will provide guidance to issuers on the RCNI submission schedule and expectations of discrepancy resolution.