INNOVATION BRIEF

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Georgia Access Collaborates to Ensure Fair Access to Coverage for Justice-Involved Individuals

The Problem

Georgia Access works to ensure eligible Georgians have greater access to quality health coverage, while limiting the ability of a small number of bad-actors from being able to commit fraud. To meet this objective, Georgia Access has developed innovations that enable these security processes to be completed in a manner that is easy and less disruptive for consumers and agents (see Innovation Brief on the use of One-Time Passcodes). All of these methods fundamentally require the engagement of the consumer to validate that they are who they – or the agent - claim they are and that they are authorizing and participating in the application / enrollment process.

Georgia Access was informed by a Georgia sheriff's department that our security measures were having the unintended effect of blocking eligible consumers in a specific and unique group. HealthCred Care, LLC ("HealthCred"), a licensed insurance agency and technology company that works with county correctional facilities, developed an innovative approach and supporting technologies and processes to serve a population of jailed individuals who were still eligible for Exchange coverage and subsidies. By verifying existing coverage or securing new coverage for eligible individuals awaiting disposition of charges, as well as individuals preparing to obtain coverage upon release, HealthCred can help counties reduce medical expenses and get more Georgians covered. The problem was that jailed individuals do not have access to either electronic devices or their own identity documents, so the Georgia Access identity verification and agent security measures are not ones that this population could make work. Historically, CMS had allowed an exception for agents working through EDE platforms, but Georgia had eliminated that exception with a Georgia-specific Change Request, and – in fact – CMS has recently done the same and implemented more security in the agent processes through EDEs and on Healthcare.gov.

The Opportunity

While many incarcerated individuals are ineligible for Exchange coverage, HealthCred focuses on populations who are jailed but still eligible for Exchange coverage under regulations. HealthCred's standard is to connect directly to the corrections institution systems to leverage the identity verification completed by law enforcement, as well as to track status of the jailed individuals, release dates for sentenced inmates, etc. In cases where the system integration has not yet been achieved, HealthCred has processes to complete and document the same verifications, complete with a full compliance package for each individual. This created a clear opportunity: a secure, compliant way to serve eligible Georgians that were unintentionally blocked by our processes and the unique constraints to which these individuals are subject.

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The Solution

It was clear from the first discussion that HealthCred leadership was interested in serving a valid population in a secure, compliant manner, and Georgia Access was willing to be creative to develop a solution that would enable this. Georgia Access had previously published an optional model consent form for agents to use to document consumer consent in a standard way. Georgia Access was willing to create a custom version specifically for HealthCred use, and HealthCred agreed to have all of their agents use this consent form. The form was modified to capture information specific to the circumstances of a jailed consumer, a specific "HealthCred" agent ticket type was created, and a custom process was built in collaboration with the Georgia Access contact center (provided to Georgia Access by our partner, Vimo) to accept and process these custom consent forms.

The process includes validation checks to ensure the submitting agent is not only Georgia-licensed and certified but also listed as a HealthCred agent within the Georgia Access system. The team collaborated to successfully pilot these processes (two separate processes were required), and the processes were put into practice.

The Implementation

While initial pilot was successful, experience over time (even a brief period) highlights the importance of monitoring the process and staying in close communication. One of the two process pathways was found to work quite differently in the production environment than in test environments, and – in fact – had a system defect that prevented it from working properly. The teams "fell back" to using a modified version of the second process, but this caused a slight amount of understandable confusion with some of the contact center staff. Our Vimo partners were quick to address this with updated training and staff communications, and the process was back on track within a day.

While the defect was recently fixed by Vimo, a new shift in requirements caused by CMS changes (specifically making email addresses required for all consumers, rather than optional), created a new challenge for a population that did not have email addresses and were not in a situation (in jail) that they could create one. HealthCred leadership has been both rapid communicators when new issues are found, and flexible in cases that it does take Georgia Access some time to assess and respond to the challenge. Georgia Access and Vimo leadership, in turn, have been open considering the viewpoint of these consumers and agents and recognizing the real challenges "standard" processes pose for them.

The work that has been invested to create and maintain this pathway will likely show its real benefits during our upcoming Open Enrollment (OE2027), but we expect it will help get thousands of additional Georgians covered and save counties and sheriff's departments in Georgia millions of dollars in covered healthcare costs. As a former law enforcement leader, Commissioner John King was glad Georgia Access could help make this possible and continues to lead and promote positive innovations that help Georgians and expand quality coverage.