

# State Market Overview

## *Ohio*



## PACKET PURPOSE

Dear conference attendee,

Thank you for joining the State-Based Exchange Growth and Innovation Conference. We appreciate your time and the service you render on behalf of the individuals, families, and households in your state.

As states consider marketplace strategy and implementation pathways, these decisions carry significant operational and policy implications and require navigating complex tradeoffs across risk, timing, and resources. This packet is designed to support state-led decision-making by providing a shared fact base, practical examples, and a set of questions to help your team assess options and align stakeholders after the conference.

This packet is for informational purposes only and does not constitute legal, actuarial, financial, procurement, or other professional advice, nor does it constitute a recommendation to pursue any specific exchange model.

We hope you use this packet to continue the conversation after the conference and accelerate next steps. If the materials prompt questions or interest in additional discussions, we welcome your engagement and can help point you to relevant resources.

Sincerely,

The OCI, MGT, and MCG Teams

# Table of Contents

## STATE BASELINE

Overview .....	5
Financial Modeling .....	6
Comparative Data .....	7
Carrier Information .....	8
2026 Enrollment Data .....	9
Policy Landscape and Goals .....	10

## EXCHANGE MODELS

Model Comparison (FFE vs SBE-FP vs SBE) .....	12
Implementation Timeline .....	13
SBE Risks and Benefits .....	14

## REPLICABLE INNOVATIONS

Section 1332 Waiver .....	16
Briefs .....	17
CMS News .....	19

## IMPLEMENTATION TOOLKIT

Key Considerations .....	21
Legislative Checklist .....	22
Letter of Intent .....	23
Blueprint .....	24

## APPENDIX

Source Library .....	26
----------------------	----

# State Baseline

*State profile, trends, and implications to inform leadership decisions*

# State Baseline | Overview



## Ohio – State Snapshot

As of January 2026

CURRENT EXCHANGE MODEL	PLAN SELECTIONS	UNINSURED RATE
<b>FFE</b>	<b>470K<sup>1</sup></b>	<b>6.7%<sup>3</sup></b>
CARRIER PARTICIPATION	USER FEE PAID TO FFE	PROJECTED STATE NET INCOME UNDER SBE MODEL
<b>11<sup>2</sup></b> PY26 New Entrants: None PY26 Exit: 2	<b>\$94M<sup>4</sup></b> Reinvestment potential if replaced with a state assessment	<b>\$56M<sup>4</sup></b> Potential Revenue – Estimated Costs

### KEY TAKEAWAYS

- **Coverage gap:** Ohio's uninsured rate (6.7%) is below the U.S. average, reflecting relatively strong coverage levels.
- **Marketplace scale:** ~470K plan selections, representing a mid-sized marketplace among FFE states.
- **Funding lever:** As an FFE state, Ohio currently pays federal user fees with no direct reinvestment control, representing a potential funding opportunity under an SBE model.



### Key Questions for Leadership

- **Outcomes:** How can Ohio further improve affordability and enrollment retention, particularly among subsidy-eligible populations?
- **Constraints:** What are the operational, financial, and governance constraints that would impact Ohio's ability to transition from an FFE to an SBE or SBE-FP.

Data shown reflects best-available public sources as of January 2026 and may be revised. For informational purposes only; no warranties; not legal/actuarial advice; independent verification required.

Source(s): <sup>1</sup>plan selections and <sup>2</sup>carrier participation (CMS Marketplace Open Enrollment / Centers for Medicare & Medicaid Services); <sup>3</sup>uninsured rate (SHADAC/CPS/ACS); Note that Carriers refers to QHP carriers. <sup>4</sup>Estimated based on CMS enrollment data and marketplace premium assumptions consistent with McKee Consulting methodology.

# State Baseline | Financial Modeling

**Opportunity Cost:** For Plan Year 2026, CMS is charging a 2.5% User Fee. With **469,616 enrollees** and a **\$665 average premium**, Ohio has **~\$94M** in opportunity costs.

Financial Calculator				
Cost Type	Total Revenue	Units	Total Costs	Units
One-Time Costs			Start-up Funding* (State Appropriation or Dedicated)	<u>\$18.8M</u>
Ongoing Costs and Revenues	Enrollment <i>(plan selections)</i>	470K	Technology and Call Center	\$37.6M
	X		+	
	Average Premium	\$665	Administration and Staffing	\$4.4M
	X		+	
	User Fee <i>(discretion of the state)</i>	3%	Outreach and Marketing	\$11.7M
	X		+	
	Months	12	Miscellaneous Expenses	\$2.3M
Totals	<u>Total Revenue Per Year</u>	<u>\$112.4M</u>	<u>Total Costs Per Year</u>	<u>\$56.1M</u>



### Strategic Questions

- What user fee rate sustains core operations while protecting affordability?
- What service offerings should be funded now versus phased in (technology, call center, outreach)?
- What start-up funding is needed to cover one-time build costs and avoid a launch-year gap? (Select start-up build costs can be amortized.)

### KEY TAKEAWAYS

- At a **3.0%** assessment, Alabama would generate **~\$112.4M/year** in exchange revenue under SBE model; after **~\$56.1M** in ongoing costs, net reinvestment potential is **~\$56.3M/year**.
- Key decision is balancing affordability vs sustainability: set a fee that funds core operations plus reserves, then use net funds to improve outreach, consumer support, and platform performance.

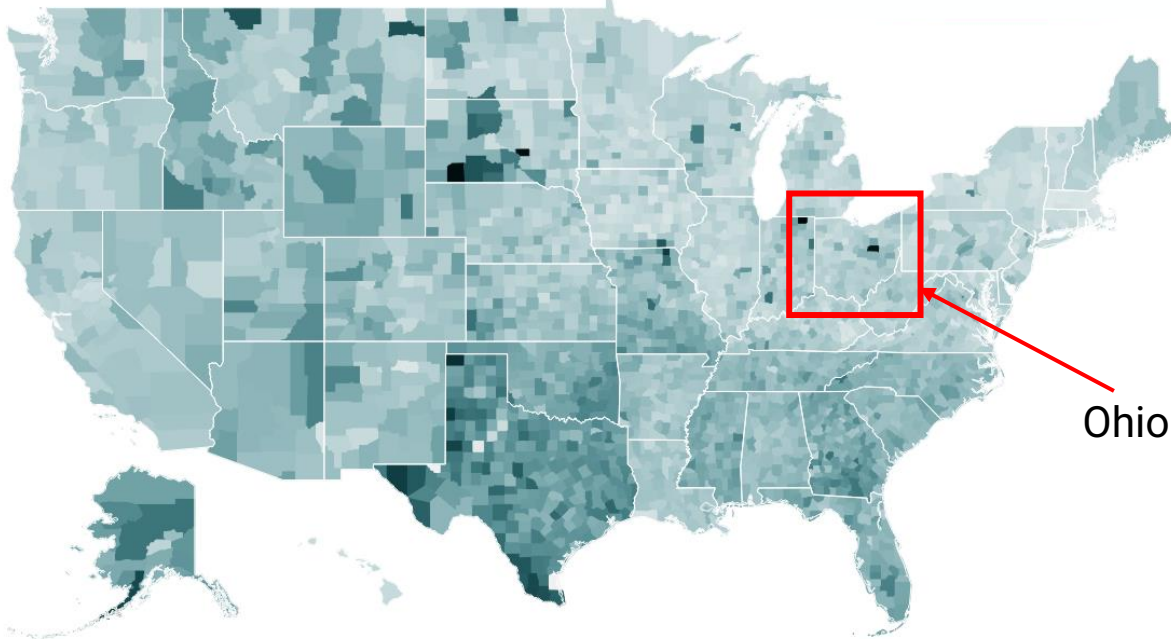
*Illustrative framework; not a budget, forecast, or actuarial estimate. For informational purposes only; verify independently. \*Start-up costs are comprised of project management office, independent verification and validation, and user acceptance.*

# State Baseline | Comparative Data

## Uninsured Map

2019-2023 American Community Survey (ACS) 5-Year Estimates: Percent Uninsured

Percent Uninsured  
0.0%  44.3%



## Core Metrics by Plan Year

Plan Year	Carriers	OE Plan Selections	Average Premium	FFE User Fee %	FFE User Fee \$
2024	12	486,180	\$581	2.20%	\$72.0M
2025	13	583,443	\$580	1.50%	\$60.9M
2026	11	469,616	\$665	2.50%	\$93.7M








### KEY TAKEAWAYS

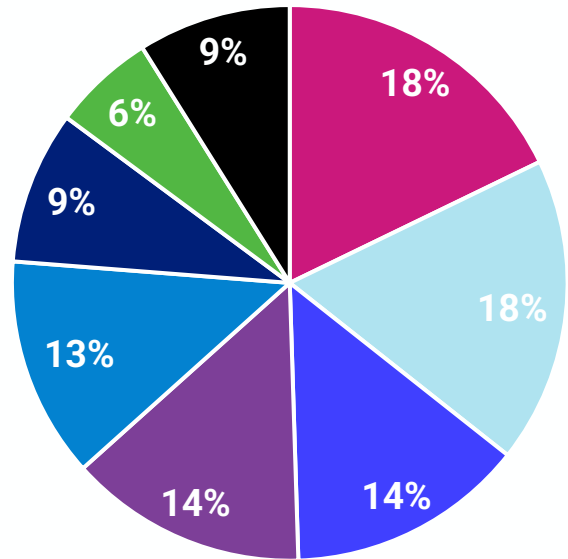
- **Enrollment dipped in 2026:** ~469K OE plan selections in 2026, down from ~583K in 2025 (~19% decline), following enrollment growth between 2024 and 2025.
- **Issuer participation tightened:** Participating carriers declined from 13 issuers in 2025 to 11 (Aetna Health and Aultcare exiting) in 2026, increasing market concentration.
- **Affordability headwinds + higher user fee:** Average premiums increased from ~\$580 (2025) to ~\$665 (2026), while the FFE user fee rose from 1.5% to 2.5%, driving estimated user fee dollars up to ~\$94M in 2026 (~54% increase from 2025) despite lower enrollment.

Source(s): CMS Marketplace Open Enrollment Public Use Files; CMS.gov; SHADAC (ACS 5-Year Estimates).

# State Baseline | Carrier Information

## Distribution of Carriers in Ohio

2024 Enrollment by Carrier		
	Buckeye Community Health Plan	18%
	Anthem Blue Cross Blue Shield	18%
	Molina Healthcare	14%
	CareSource Inc.	14%
	Oscar Buckeye State Insurance	13%
	Medical Health Insuring Corp. of Ohio	9%
	UnitedHealthcare of Ohio, Inc.	6%
	Others*	9%



- Buckeye Community Health Plan
- Anthem Blue Cross Blue Shield
- Molina Healthcare
- CareSource Inc.
- Oscar Buckeye State Insurance
- Medical Health Insurance Corp. of Ohio
- United Healthcare of Ohio, Inc.
- Others\*

### KEY TAKEAWAYS

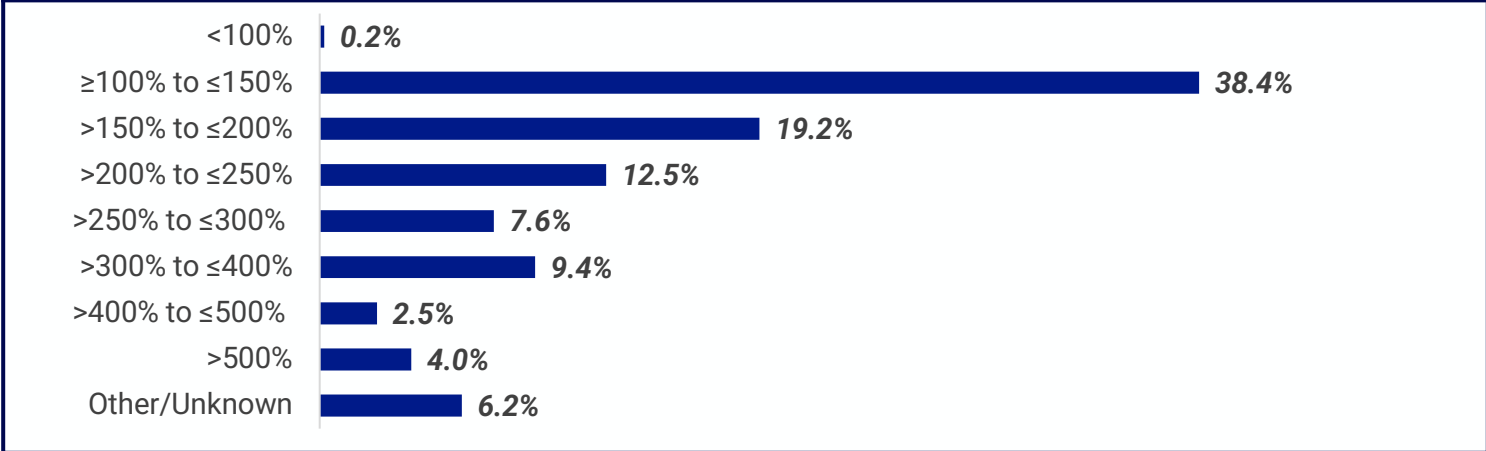
- **Market breadth:** 12 (2024), 13 (2025) and 11 (2026) participating issuers in Ohio (above typical marketplace breadth) with a balanced concentrated enrollment distribution.
- **Concentration:** Top carriers, Buckeye Community Plan and Anthem Blue Cross Blue Shield, holds 36% of enrollment suggesting moderate concentration risk and increased competitive pressure on pricing and design.

Source(s): CMS Issuer-Level Enrollment (2024).

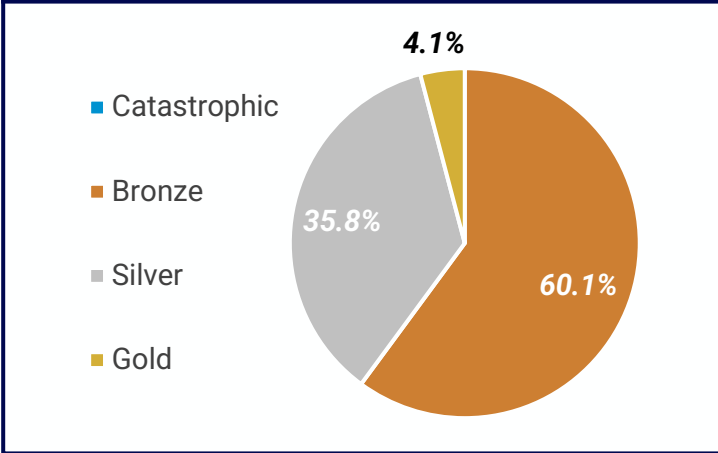
# State Baseline | 2026 Open Enrollment

## 2026 Enrollment Data in Ohio

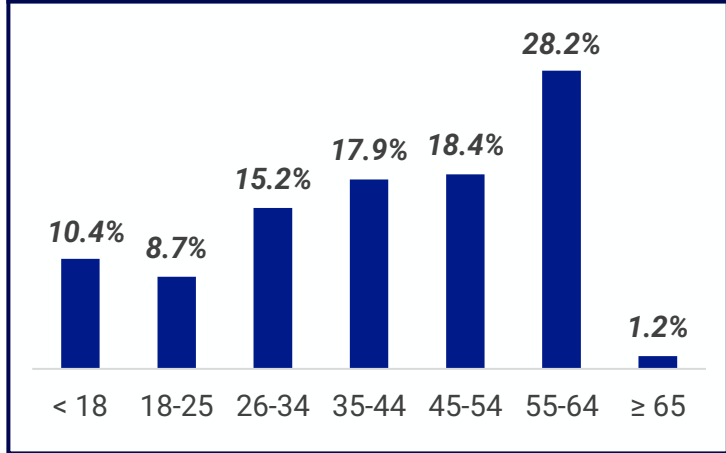
### PLAN SELECTIONS BY % FEDERAL POVERTY LEVEL



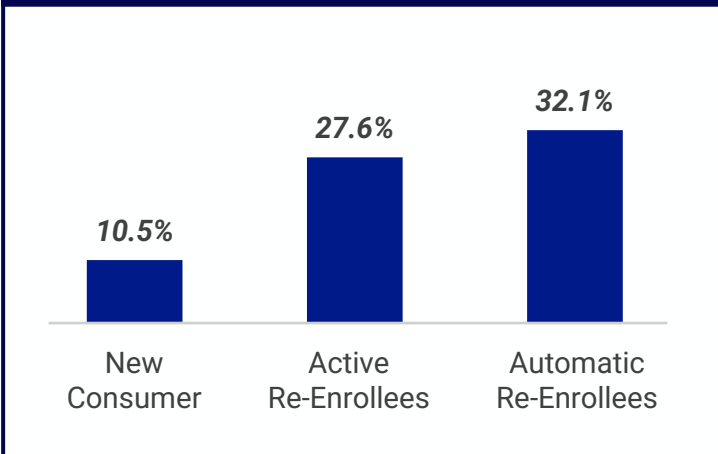
### PLAN SELECTIONS BY METAL LEVEL



### PLAN SELECTIONS BY AGE



### PLAN SELECTIONS BY ASSISTANCE



### KEY TAKEAWAYS

- **Subsidy-driven enrollment:** Enrollment is highly concentrated among lower-income populations (100–150% FPL), underscoring the role of subsidies in driving coverage.
- **Retention over growth:** Most enrollees are returning (active and automatic re-enrollees), with relatively fewer new consumers entering the marketplace.

Source(s): CMS.gov.

# State Baseline | Policy Landscape and Goals

## Policy Goals of Ohio



Affordability



Market Stability



Consumer Protection



Rural Health Access



Coverage Access



Data-Driven Decision Making

In Ohio, state leadership has emphasized improving healthcare affordability and expanding access to coverage while maintaining a stable and competitive insurance market. The state's Medicaid expansion reflects a continued focus on reducing the uninsured rate and supporting low-income populations. At the same time, the Ohio Department of Insurance plays a central role in promoting market stability and consumer protection through oversight of insurers and premium rates. State priorities also include addressing access challenges in rural communities and using data to inform policy decisions and improve health outcomes.

“Access to quality health care is essential for Ohioans to live up to their full potential.”

– Governor Mike DeWine

“The mission of the Ohio Department of Insurance is to protect consumers through fair and efficient regulation while promoting a stable and competitive insurance marketplace.”

– Ohio Department of Insurance

### KEY TAKEAWAYS

- **Priority alignment:** State leadership emphasizes affordability, coverage access, and market stability, supported by Medicaid expansion and a continued focus on consumer protection through the Ohio Department of Insurance.
- **Execution reality:** Ohio pairs access goals with regulatory oversight and market competition—relying on ODI rate review, insurer participation, and Medicaid coverage to maintain stability while addressing affordability and access challenges, including in rural areas.

## Exchange Models

*Operating model options, tradeoffs, and decision criteria for state marketplaces*

# Exchange Models | Model Comparison

## Exchange Models (FFE vs SBE-FP vs SBE)



**Federally Facilitated Exchange (FFE):** A marketplace where the federal government (CMS) operates the exchange platform and core enrollment infrastructure (HealthCare.gov), and the state primarily retains its traditional insurance oversight role (e.g., DOI regulation), with no direct control over exchange operations.



**State-Based Exchange on the Federal Platform (SBE-FP):** A marketplace where the state operates limited exchange functions such as plan management and consumer outreach while using the federal enrollment platform (HealthCare.gov) for eligibility and enrollment, combining greater state operational control with federal platform reliance.



**State-Based Exchange (SBE):** A marketplace where the state operates the exchange, including the consumer-facing marketplace platform and associated operations (directly or through vendors), and is responsible for exchange performance, which provides maximum state control but also greater implementation, operational, and accountability burden.

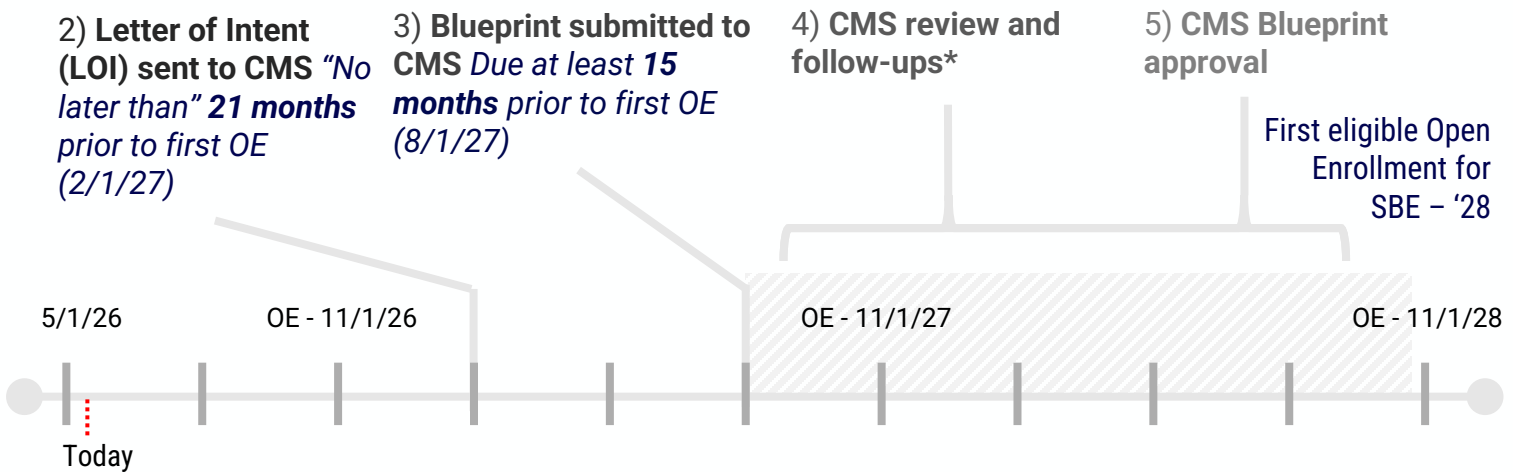
Function	FFE	SBE-FP	SBE
<b>Governance</b>	<ul style="list-style-type: none"> <li>Federal governance</li> <li>Limited state control</li> </ul>	<ul style="list-style-type: none"> <li>State entity required</li> <li>CMS agreements</li> </ul>	<ul style="list-style-type: none"> <li>State entity required</li> <li>Full accountability</li> </ul>
<b>User Fees</b>	<ul style="list-style-type: none"> <li>FFE user fee applies</li> <li>No reinvestment control</li> </ul>	<ul style="list-style-type: none"> <li>State sets user fee (within rules)</li> </ul>	<ul style="list-style-type: none"> <li>State sets user fee and funds full operations</li> </ul>
<b>Platform</b>	<ul style="list-style-type: none"> <li>HealthCare.gov</li> </ul>	<ul style="list-style-type: none"> <li>HealthCare.gov platform</li> <li>State runs limited exchange functions</li> </ul>	<ul style="list-style-type: none"> <li>State platform or vendor</li> <li>State owns UX and operations</li> </ul>
<b>Plan Management</b>	<ul style="list-style-type: none"> <li>CMS certifies QHPs</li> <li>State regulates insurers</li> </ul>	<ul style="list-style-type: none"> <li>CMS certifies QHPs</li> <li>State supports plan</li> </ul>	<ul style="list-style-type: none"> <li>State certifies QHPs</li> <li>State leads oversight</li> </ul>
<b>Consumer Assistance</b>	<ul style="list-style-type: none"> <li>CMS-led baseline</li> <li>Limited tailoring</li> <li>CMS call center</li> </ul>	<ul style="list-style-type: none"> <li>State controls outreach</li> <li>CAC/broker strategy</li> <li>State call center</li> </ul>	<ul style="list-style-type: none"> <li>State controls outreach</li> <li>Integrated digital tools</li> <li>State call center</li> </ul>
<b>Compliance and Reporting</b>	<ul style="list-style-type: none"> <li>CMS-led controls</li> <li>State coordinates</li> </ul>	<ul style="list-style-type: none"> <li>State-led with guardrails</li> <li>Evidence required</li> </ul>	<ul style="list-style-type: none"> <li>State-led full program</li> <li>Evidence and audits</li> </ul>

# Exchange Models | Implementation Timeline

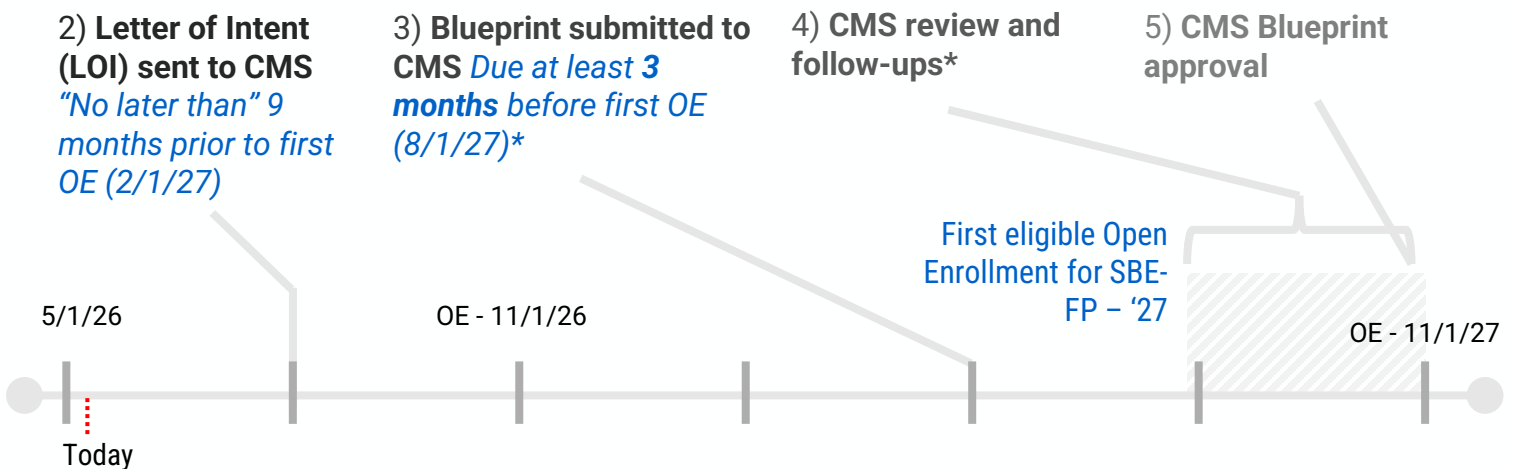
## SBE & SBE-FP Implementation Timeline



### 1) Elect to Transition from FFE to an SBE



### 1) Elect to Transition from FFE to an SBE-FP



### KEY TAKEAWAYS

- The key deadline to consider is 2/1/27 to submit the LOI for either SBE or SBE-FP.
- CMS performs iterative review of Blueprint submission; readiness checks occur during this time.

Source(s): CMS CCIIO, [Exchange Blueprint Application](#) (SBE/SBE-FP timing guidance) and 45 CFR §155.106 (submission timing requirements).

\*Note: Current CMS rules do not require a one-year interim period for FFE to SBE-FP. A separate one-year SBE-FP requirement currently applies only to states seeking to launch a full State Exchange. CMS has proposed removing that requirement for 2027. 13

# Exchange Models | SBE Risks and Benefits

## Risks

- **Cost:** Start-up and ongoing operations; steady-state run rate risk
- **Procurement:** Complex timelines and vendor dependencies
- **Readiness:** Gaps across policy, finance, operations, and delivery
- **Governance:** Heavier decision rights, accountability, and oversight
- **Platform:** Build and integration risk (especially beyond SBE-FP)

## Benefits

- **Control:** Direct ownership of plan management and market strategy
- **Revenue:** Reinvestible user-fee value to fund outreach and improvements
- **Tailoring:** Consumer support and equity strategies aligned to local needs
- **Accountability:** Clear performance expectations for vendors and customer experience (CX)
- **Agility:** Faster response to market events and policy priorities



## When to Pause

- **Scale:** Enrollment too small to sustain prudent run rate without higher fees or fewer benefits
- **Authority:** Governance and decision rights unclear or politically unstable
- **Capacity:** Procurement flexibility or vendor market depth too limited
- **Value:** Objectives achievable via FFE improvements or SBE-FP without full platform risk

## KEY TAKEAWAYS

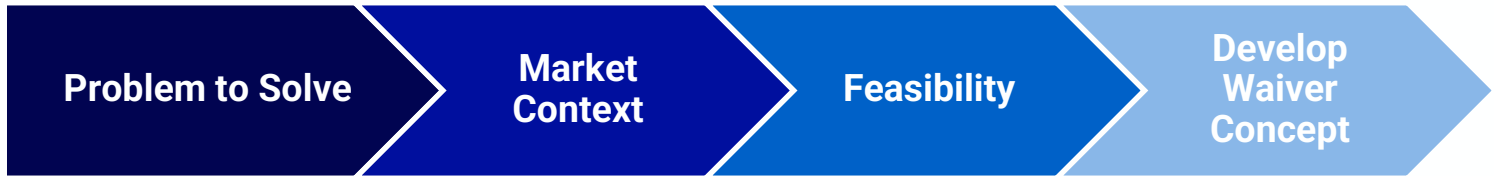
- Moving toward an SBE is a deliberate tradeoff: more state control and flexibility, but higher operational cost, complexity, and execution risk.
- The case is strongest when user-fee reinvestment and objectives justify the operating run rate.
- The case is weakest when fixed costs, procurement constraints, or governance capacity materially increase consumer disruption risk.

# Replicable Innovations

*Proven implementation ideas and reusable artifacts to accelerate state progress*

# Replicable Innovations | Section 1332 Waiver

## 1332 Waiver Decision Pathway



### Primary Problems to Solve

- 1 **Stabilize Premiums:** Reinsurance / risk stabilization
- 2 **Improve Affordability:** Subsidy wrap or cost-sharing support (within guardrails)
- 3 **Expand Coverage:** Targeted coverage pilots for specific populations



### Market Context



Market context matters because a 1332 waiver only works if it fits the state's actual market dynamics. Enrollment mix, premiums, carrier participation, and operational constraints determine both the size of the impact and what is feasible to implement.

### Federal Guardrails



- **Coverage:** A comparable number of residents must have coverage
- **Affordability:** Coverage must be at least as affordable for residents
- **Comprehensiveness:** Benefits must be at least as comprehensive
- **Deficit Neutrality:** The waiver cannot increase the federal deficit



### Timeline

~12–18 months from concept to approval.

### KEY QUESTION

- Is there a clearly defined affordability or coverage problem that a 1332 waiver can materially improve, with acceptable implementation risk and administrative burden?

*A 1332 waiver is the ACA State Innovation Waiver pathway; requires meeting federal guardrails and approval; may include federal pass-through funding. 1332 can be pursued independent of an exchange model. See QR code for Georgia Waiver.*

# Replicable Innovations | Briefs (1 of 2)

## Innovation Brief Examples



### Enhanced Direct Enrollment (EDE)

- **Problem:** Consumer friction and low conversion
- **Approach:** Allow approved partners to enroll consumers through certified pathways
- **Prerequisites:** Strong partner oversight, security controls, data governance
- **Value/Risk:** Convenience and reach; requires tight governance



### Verification Modernization (\*GDOL model)

- **Problem:** High costs, eligibility churn, and documentation burden
- **Approach:** Improve income/verification workflows and data matching
- **Prerequisites:** Data-sharing agreements, integration capability, governance
- **Value/Risk:** Better experience; must manage privacy and data quality



### One-Time Password (OTP) and Account Protection

- **Problem:** Fraud and consumer friction
- **Approach:** Implement modern authentication and recovery procedures
- **Prerequisites:** Identity strategy, call center procedures, accessibility testing
- **Value/Risk:** Reduced fraud; usability tradeoffs to manage

## KEY TAKEAWAYS

- **EDE:** Boosts conversion via partners but demands strong oversight.
- **GDOL model:** Cuts verification churn through data matching and workflow redesign.
- **OTP:** Strengthens account security; manage accessibility and recovery friction.

Source(s): See source library. \*Georgia Department of Labor (GDOL).

# Replicable Innovations | Briefs (2 of 2)

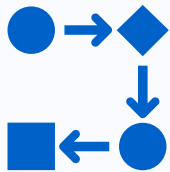
## Innovation Brief Examples

### Community Partners



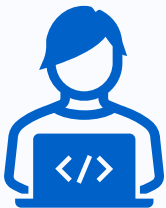
- **Problem:** Hard-to-reach groups face awareness, access, and language barriers
- **Approach:** Equip trusted local orgs to do outreach and education support
- **Prerequisites:** Partner criteria, training, privacy/consent, QA, reporting
- **Value/Risk:** Better equity and retention; requires tight oversight

### Platform Contact Center Integration



- **Problem:** High procedural churn and documentation burden
- **Approach:** Integrate contact-center workflows, shared notes, and warm handoffs across programs
- **Prerequisites:** Shared governance, data-sharing agreements, trained staff
- **Value/Risk:** Higher retention and faster resolution; needs privacy and data quality safeguards

### Exchange Rules Engine



- **Problem:** Slow updates, and friction
- **Approach:** Establish a dedicated exchange rules engine that manages marketplace-specific eligibility logic
- **Prerequisites:** Clearly defined marketplace rules, data governance, access controls, and robust scenario testing
- **Value/Risk:** Faster updates, fewer errors, improved consumer experience

#### KEY TAKEAWAYS

- **Community partners:** Extend reach and equity; require training and QA.
- **Platform Integration:** Reduces procedural churn through shared workflows and handoffs.
- **Rules engine:** Improves consistency and integrity; monitor for inequitable impacts.

Source(s): See source library.

# Replicable Innovations | CMS News

## Marketplace Integrity and Affordability (MIA) Rule: 2026 Stay and 2027 Re-Proposals

On Aug. 22, 2025, a federal district court stayed several MIA Final Rule provisions. For OE 2026, the five items below are not in effect. CMS has separately re-proposed select items and advanced related proposals in the 2027 NBPP proposed rule.



**Income verification policies** | Re-proposed for 2027: Income verification for below-100% FPL mismatches and no IRS tax data.



**Past-due premiums** | Related 2027 proposal: Past-due premium denial stayed; CMS instead seeks comment on premium payment thresholds.



**AV de minimis expansion** | Related 2027 proposal: actuarial value de minimis expansion stayed; CMS instead proposes bronze and catastrophic cost-sharing flexibility.



**Minimum \$5 premium payment** | No direct 2027 re-proposal identified: \$5 premium for certain auto re-enrollees.



**SEP documentation requirements** | Re-proposed for 2027 on FFEs and SBE-FPs: SEP verification beyond loss of MEC and 75% of new SEP enrollments.

### KEY TAKEAWAYS

- **Context:** The stay governs PY 2026. The five items above are not in effect for PY 2026.
- **2027 outlook:** CMS re-proposes income verification and broader SEP verification and advances related proposals on premium thresholds and bronze/catastrophic cost sharing.
- **Planning implication:** Build 2026 operations off the stayed-status list and monitor 2027 rulemaking separately for re-proposed and related policy changes.

Source(s): [Impacts of City of Columbus v. Kennedy on Open Enrollment \(OE\) 2026](#); [HHS Notice of Benefit and Payment Parameters for 2027 Proposed Rule](#) | CMS

# Implementation Toolkit

*High-level readiness considerations and example artifacts for states choosing to proceed*

# Implementation Toolkit | Key Considerations

## Questions to Pressure Test a Transition

Area	Key Questions
<b>Strategic Fit</b>	<ul style="list-style-type: none"> <li>• What outcomes matter most in the next 12–24 months?</li> <li>• What does “success” mean, and what is unacceptable disruption?</li> </ul>
<b>Financial</b>	<ul style="list-style-type: none"> <li>• Can fees reliably cover run rate, reserves, and volatility?</li> <li>• In a downside case, what fails first?</li> </ul>
<b>Authority and Governance</b>	<ul style="list-style-type: none"> <li>• Is authority clear and durable?</li> <li>• Who decides, who owns risk, and who is accountable?</li> </ul>
<b>Procurement</b>	<ul style="list-style-type: none"> <li>• Can we contract for this scope under our rules?</li> <li>• Where could vendor dependence create single points of failure?</li> </ul>
<b>Operational</b>	<ul style="list-style-type: none"> <li>• Do we have the people and processes to run core functions day to day?</li> </ul>
<b>Technology</b>	<ul style="list-style-type: none"> <li>• What must integrate cleanly, and what cannot break?</li> </ul>
<b>Integrity</b>	<ul style="list-style-type: none"> <li>• Can we strengthen controls without reducing access or equity?</li> </ul>
<b>Stakeholder Alignment</b>	<ul style="list-style-type: none"> <li>• Where is resistance most likely, and what is the path to alignment?</li> <li>• What exactly changes for consumers, and what stays the same?</li> </ul>



### KEY TAKEAWAYS

- Transition decisions succeed when objectives, readiness, and risk tolerance are explicit; if authority, funding, vendors, or capacity are weak, prioritize lower-risk improvements first.

*Informational only; not legal/procurement advice. No warranties; verify independently.*

# Implementation Toolkit | Legislative Checklist

## Statutory Checklist for Exchange Implementation

### Required Provisions

- Create or designate the exchange entity
- Define governance accountability
- Authorize exchange functions and responsibilities
- Authorize funding, fee collection, spending
- Authorize contracting (procurement and vendor)
- Authorize safeguards (data use, sharing)
- Authorize program integrity and audits

### Optional Provisions

- Set financial controls and audit requirements
- Set fee policy guardrails
- Set reporting and transparency requirements
- Set performance targets and remedies
- Define appeals and complaints process
- Define consumer assistance standards
- Set equity and accessibility standards



### State Examples

- **Georgia:** Georgia Senate Bill 65 (or successor authorizing action)
- **Pennsylvania:** Act 42 of 2019 (created Pennie)
- **Virginia:** Code of Virginia 38.2-6502 (Virginia's Insurance Marketplace)

### KEY TAKEAWAYS

- Use this checklist to confirm statutory authority for the target model (SBE or SBE-FP).
- Use peer-state examples to accelerate drafting and clarify what can be addressed in statute vs. rule or interagency agreement.

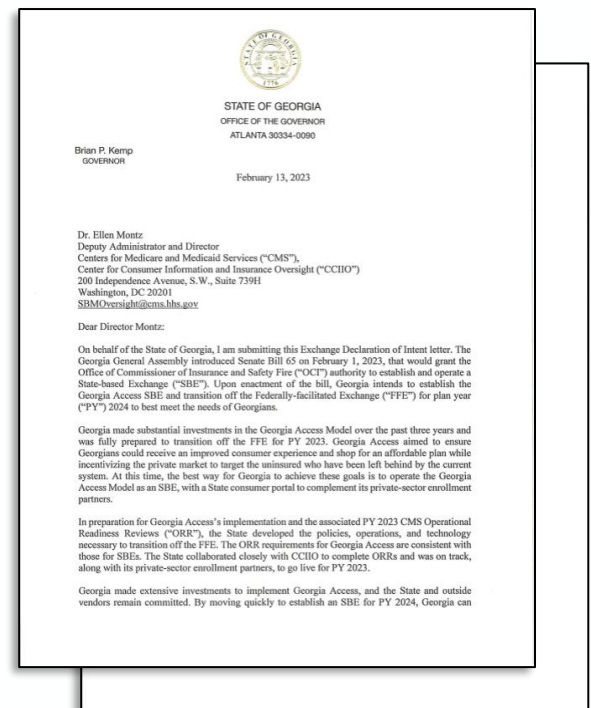
# Implementation Toolkit | Letter of Intent

## Letter of Intent

**Purpose:** A Letter of Intent (LOI) is a short, non-binding notice to CMS that a state is exploring or intends to pursue an exchange model change (SBE-FP or SBE) and requests structured engagement. CMS generally expects an LOI as an early step to initiate coordination and clarify requirements, even when not explicitly mandated in statute or regulation.

### Template Elements

- **Statement of intent:** Alabama intends to pursue [SBE-FP/SBE] effective [Plan Year], subject to final approvals.
- **Target model (neutral):** [FFE → SBE-FP → SBE] or [Alternative pathway].
- **Proposed timeline:** Planning: [dates]; Procurement: [dates]; Build/Test: [dates]; Launch: [date].
- **Governance owner:** Accountable entity: [Agency/Authority], with oversight by [Board/Secretary/etc.].
- **Operational scope:** Plan management; consumer assistance; outreach; finance; program integrity; reporting.
- **Request for CMS engagement:** Request initial technical assistance, checkpoint cadence, and submission guidance.
- **Primary contacts:** Executive sponsor: [Name/Title]; Program lead: [Name/Title]; Technical lead: [Name/Title].







### KEY TAKEAWAYS

- Send an LOI early to open a structured dialogue with CMS on approach, scope, and timing.
- Clarify the target model, governance owner, and high-level implementation timeline.
- Request CMS technical assistance, key milestones, and submission expectations.

# Implementation Toolkit | Blueprint

## Blueprint Readiness Map

 Workstream	 Deliverables	 Evidence Examples	 CMS Review Criteria
<b>Governance</b>	Entity, oversight, policies	Statute/EO; charter; approvals	Authority docs; governance; policies; decision rights
<b>Plan Management</b>	QHP certification and issuer oversight	Manual; templates; timelines	QHP certification; issuer oversight; timelines; controls
<b>Consumer Assistance and Outreach</b>	CAC/broker, call center, marketing	SLAs; training; campaigns	Call center; CAC/broker; accessibility; equity plan
<b>Eligibility and Enrollment Interfaces</b>	Data flows, integrations, testing	ICDs; test evidence; error handling	Integration; data flows; testing; error handling
<b>Finance and Accounting</b>	User fee, controls, audit readiness	SOPs; audit plan; reporting cadence	Fee policy; accounting controls; audit readiness
<b>Program Integrity</b>	Verification, appeals, oversight	Integrity plan; monitoring; audit protocols	Verification; fraud prevention; appeals
<b>Privacy and Security</b>	Security program and incident response	Policies; pen test; IR plan	Security program; incident response; access controls
<b>Reporting</b>	CMS reporting and internal dashboards	Calendar; data dictionary; QA	Required reporting; QA controls; dashboards
<b>Vendor Management</b>	SLAs, governance, performance monitoring	Contracts; scorecards; escalation	Oversight, performance controls

### KEY TAKEAWAYS

- The blueprint is an evidence package: CMS assesses whether capabilities and controls exist, not just whether documentation is written.
- Use the table to identify high-risk gaps early (authority, integrations, consumer support, security).
- Requirements and review emphasis can vary; validate expectations with current CMS guidance and state counsel.

---

# Appendix

# Appendix | Source Library

## SBE Resource Library

The Master QR code links to a curated folder of templates, examples, and reference materials to support planning and implementation.

### Feasibility

- Feasibility RFP and study examples
- Operating model and cost model examples

### CMS Approval

- LOI example
- Blueprint instructions and checklists
- Blueprint application example

### Legislation

- Illustrative statutory or regulatory language excerpts that enabled reform

### Procurement

- IT and call center RFP examples
- Analytics/reporting RFP examples
- QA/UAT and independent verification scopes

### Innovation Briefs

- EDE brief
- Verification modernization brief
- OTP/account protection one-pager

### 1332 Waivers

- CMS guidance and application resources
- State examples (reinsurance, affordability)

### Master QR

Full packet + library



# Thank You

Questions?

Email George Durham ([gdurham@mgt.us](mailto:gdurham@mgt.us)),  
Young Lee ([ylee@mgt.us](mailto:ylee@mgt.us)), or  
Duane McKee ([duane@mckeeconsultinggroup.com](mailto:duane@mckeeconsultinggroup.com))