QUALIFIED HEALTH PLAN DIRECTORY PILOT

FREQUENTLY ASKED QUESTIONS

PUBLISHED ON 12/20/2024

Qualified Health Plan (QHP) Directory Pilot (September 17, 2024)

As part of its ongoing work to improve access to care, reduce clinician burden, and support interoperability throughout the health sector, the Centers for Medicare & Medicaid Services (CMS) announced on September 17, 2024, a partnership with the state of Oklahoma on a first-of-its-kind directory pilot. One goal of this pilot is to develop an automated, single, statewide centralized directory for Qualified Health Plans (QHPs) and providers in Oklahoma to improve data accuracy, lessen burden on providers and payers, lower administrative costs, support interoperable data exchange, and ultimately improve patient and provider experiences. CMS believes that this pilot will serve as a proof-of-concept and help inform any future development of a National Directory of Health (NDH) that can serve as a centralized database for provider information. Below are frequently asked questions (FAQs) about the QHP Directory Pilot (pilot).

For additional questions, please contact QHPDirectorypilot@cms.hhs.gov.

GENERAL INFORMATION

1. **Question:** What is the QHP Directory Pilot?
   - **Answer:** CMS announced a first-of-its-kind pilot program to establish and implement an automated, one-stop-shop, statewide, centralized directory for the test state of Oklahoma that allows issuers of QHPs and providers to submit, validate, and access pre-populated provider data to improve accuracy and reduce burden. The provider portal and data within the portal will not be consumer-facing.

2. **Question:** What is the goal of this pilot? How will it benefit providers, issuers, and consumers?
   - **Answer:** The goal of this pilot is to develop a directory of providers participating in QHP provider networks in Oklahoma that: improves data accuracy, lessens burden on providers and payers, lowers administrative costs, supports interoperable data exchange, and improves patient and provider experiences. Ideally, this pilot will serve as a proof-of-concept that an NDH can serve as a single point of entry for providers to regularly update or confirm their directory information, which could lead to better information for health care consumers.

3. **Question:** Who will be participating in the pilot?
   - **Answer:** The pilot is taking place in collaboration with Oklahoma, a state served by a Federally facilitated Marketplace. It will allow providers participating in QHP provider networks in Oklahoma to review and update provider data (at a minimum, name, location address, and contact information) and give QHP issuers in Oklahoma access to that data.

4. **Question:** Is this portal for consumers?
   - **Answer:** Currently, this portal is for providers and QHP issuers in Oklahoma. Consumers will not be able to directly access directory information under this pilot. However, CMS anticipates that consumers may benefit from the pilot through improved data accuracy if QHP issuers then display the data on their own consumer-facing websites.

5. **Question:** How will this pilot inform an NDH?
   - **Answer:** Lessons learned during this pilot may inform the future build, implementation, and ongoing operation of a national, centralized database to house and communicate accurate provider data, potentially benefiting other programs like Medicare and Medicaid.

6. **Question:** What is the proposed timeline for the QHP Directory Pilot?
   - **Answer:** IT development and stakeholder outreach started in September 2024, and the portal is expected to go live in the spring of 2025.

OPEN ENROLLMENT

7. **Question:** Will this pilot necessitate changes to HealthCare.gov?
   - **Answer:** There are no planned changes to HealthCare.gov as part of this pilot.

8. **Question:** How does this pilot differ from how the HealthCare.gov provider directory works today? Does this pilot mean that the data used on HealthCare.gov are incorrect?
   - **Answer:** HealthCare.gov has a longstanding provider lookup feature based on data supplied by QHP issuers. The QHP issuers in Oklahoma are responsible for collecting and maintaining these data and ensuring their accuracy. This pilot may provide insight into opportunities for simplifying the process of keeping provider data current.

9. **Question:** Consumers are currently shopping and enrolling in plans in Oklahoma during Marketplace Open Enrollment for Plan Year 2025. Does this pilot impact Marketplace QHP issuers in Oklahoma or the provider information available for Marketplace plans in Oklahoma that consumers use to decide on a plan?
   - **Answer:** During Plan Year 2025 Open Enrollment, the pilot and portal are still under development. The launch of the portal will take place after Open Enrollment ends on January 15, 2025, and will not impact issuers or the provider information available to consumers during the 2025 Open Enrollment.

10. **Question:** One of the goals of the pilot is to improve the accuracy of information available in provider directories and, ultimately, improve the accuracy of information available to consumers and enrollees. Is the provider information for Marketplace plans in Oklahoma accurate on HealthCare.gov, enrollment partner websites (EDEs/DEs), and Oklahoma issuer websites right now during Open Enrollment? How is CMS ensuring that provider information used by consumers during Open Enrollment to choose a Marketplace plan is accurate today? How can consumers shopping for a Marketplace plan during Open Enrollment ensure the provider and facilities information they're using to make an enrollment decision is accurate?

    - **Answer:** HealthCare.gov, EDEs/DEs, and Oklahoma issuer websites remain the best resources available for QHP provider information during Open Enrollment. QHP issuers in Oklahoma are responsible for collecting and maintaining provider directory data and ensuring their accuracy. Consumers may also contact providers and facilities directly to verify in-network status with QHP issuers of choice.

ROLES AND RESPONSIBILITIES

11. **Question:** What role will providers and QHP issuers play in this pilot?

    - **Answer:** Providers will play a key role in the QHP Directory Pilot. CMS aims to work closely with providers during the QHP Directory Pilot development process to assess their needs and opportunities for burden reduction. To support this goal, CMS will ask a subset of providers who volunteered to participate in initial testing of the provider directory portal user interface (UI) (also referred to as the provider directory platform). Following the testing phase, CMS will undertake a broader launch of the pilot, at which time those participating providers will be asked to log into the directory platform, view their pre-populated data, and validate the data or correct any inaccuracies in their records. In addition to using and assessing the directory pilot, CMS will rely on these providers to share their experiences using the platform from ease of use and value provided perspectives.

        The Oklahoma Insurance Department is requiring QHP issuers in Oklahoma to participate in this pilot. QHP issuers will use the data updated from the provider directory portal to update the information they display for providers, and QHP issuers will encourage provider participation in the pilot. In addition, CMS and Oklahoma will work closely with QHP issuers and providers to encourage their participation in this pilot effort. CMS will also develop a recruitment and implementation plan, working in conjunction with QHP issuers to deliver messages and guidance about the pilot program to providers.

12. **Question:** Will QHP issuers or providers have to change current processes for provider directory information? Does the pilot impact current QHP issuer requirements for maintaining up-to-date provider directory information via the Marketplace machine-readable format and specifications for use in consumer shopping experiences?

- **Answer:** CMS will continue to engage with stakeholders on the pilot, aiming to reduce burden for providers and payers. QHP issuer requirements for maintaining up-to-date provider directory information via the Marketplace machine-readable format remain the same.

13. **Question:** Would updating the QHP Directory Pilot records preclude providers from having to update records directly with individual QHP issuers?
    - **Answer:** One goal of the pilot is to reduce provider burden, and CMS is taking this question into consideration during this pilot phase.

14. **Question:** Are all health plans in Oklahoma being asked to participate in the QHP Directory Pilot?
    - **Answer:** At this time, participation in the pilot is limited to all QHP issuers in Oklahoma.

DATA STRATEGY AND PORTAL DESIGN

15. **Question:** What data components does CMS plan to include in the QHP Directory Pilot project?
    - **Answer:** At a minimum, CMS intends to include basic provider demographic data (e.g., name, location, specialty) and is holding discussions with stakeholders to consider what data components are most helpful as the pilot data components are finalized. The scope of the directory pilot may expand in the future to include additional data.

16. **Question:** Will whether a provider is accepting new patients be included as a data component in the pilot directory?
    - **Answer:** CMS is evaluating which data components to include and intends to collect this information. CMS welcomes feedback and will consider input related to which data components are most valuable to consumers, providers, and issuers.

17. **Question:** Will tax ID be considered as a data component in the pilot directory?
    - **Answer:** CMS is considering including tax ID as a data component in the pilot directory. Discussions about this capability are underway. CMS welcomes feedback and will consider input related to which data components are most valuable to consumers, providers, and issuers.

18. **Question:** Will providers be required to input their own data into the QHP Directory Pilot project?
    - **Answer:** CMS will extract provider information from existing data sources and pre-populate it in the pilot directory. Providers and/or their delegates will subsequently be asked to log into the provider directory portal, review their pre-populated data, and either validate the data or correct any data inaccuracies.

19. **Question:** Will group administrators be able to verify data or do providers need to verify data individually?

- **Answer:** CMS intends to design a user-friendly provider directory portal that reduces provider burden. CMS is considering providing a mechanism for data verification for multiple providers at once by group administrators and/or provider delegates. Discussions about this capability are underway. CMS welcomes feedback and will consider input related to which data components and functionalities are most valuable to consumers, providers, and issuers.

20. **Question:** Will CMS provide training and support for participants in the QHP Directory Pilot project?
    - **Answer:** Yes. CMS is developing educational resources to support pilot participants, including these FAQs and on-demand training resources.

21. **Question:** How does CMS plan to address the data upload process for issuers with large numbers of providers?
    - **Answer:** CMS will leverage Fast Healthcare Interoperability Resources (FHIR) application programming interface (API) capabilities to address this issue.

22. **Question:** Will issuers be able to audit the data in the directory?
    - **Answer:** Yes, issuers will have full access to the provider data in the directory.

23. **Question:** How will data inaccuracies be addressed?
    - **Answer:** CMS is developing a data strategy to improve the quality of directory data available to CMS and QHP issuers to reduce provider and QHP issuer burden in maintaining provider network directories. Such a strategy would include, but not be limited to, identifying and mapping critical provider data from CMS and Department of Health and Human Services (HHS) systems, assessing data quality and identifying high-value and high-quality sources, and comparing available data sources to improve and validate data accuracy. The data strategy aims to address as many data inaccuracies as possible prior to the launch of the portal where providers will validate the data. Providers will have the ability to review, validate, and, if necessary, edit or update information in the portal prior to attesting to its accuracy.

FEEDBACK AND ENGAGEMENT

24. **Question:** How will CMS engage with stakeholders about the pilot?
    - **Answer:** CMS will work closely with QHP issuers, providers, health systems, consumer groups, and other interested parties on this pilot. CMS held an initial series of stakeholder listening sessions in September/October 2024 and intends to conduct additional sessions as the pilot moves forward. In the meantime, interested parties may direct any feedback or questions to our mailbox at QHPDirectoryPilot@cms.hhs.gov.

25. **Question:** How can an issuer, provider, or facility volunteer to participate in portal user testing?
    - **Answer:** Currently, CMS plans to begin phased testing of the Oklahoma provider directory portal in early 2025. Those interested in participating in user feedback or end-user testing can contact the QHP Directory Mailbox at QHPDirectorypilot@cms.hhs.gov with the subject line: "Potential Tester," and by including their name, title, and organization.