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**Federally Facilitated Marketplace Eligibility and Enrollment Learning Collaborative  
Account Transfer Schematron Updates – Meeting Notes**

**October 2, 2014  
12:00-12:30pm ET**

**PARTICIPANTS**

- *CMS Presenter:* Josh Volosov (CMCS)
- *QSSI Presenter:* Kenneth Sall
- *Manatt:* Chris Cantrell and Liz Osius

**PRESENTATION**

QSSI presenters reviewed updates to the Account Transfer Schematron that were implemented in response to issues raised during the testing process for the Account Transfer Business Services Definition (BSD) Version 2.3.2. In addition, presenters clarified outstanding questions regarding Exchange eligibility for Inbound Account Transfers. Finally, presenters reviewed testing processes for Version 2.3.2 of the BSD and updated Schematron.

**STATE QUESTIONS & ANSWER**

*States asked questions regarding updates to the Account Transfer Schematron, specific data elements in the Account Transfer payload, Exchange eligibility for Inbound Account Transfers, and the testing process for the Account Transfer BSD Version 2.3.2.*

**Questions Regarding Updates to the Account Transfer Schematron**

**Question:** Will the Schematron updates be implemented on October 31<sup>st</sup>?

**Answer:** The Schematron updates will be implemented on October 31<sup>st</sup>. CMS will provide further guidance on implementation timing as available.

**Question:** Is there a table describing the Schematron updates for Inbound/Outbound Account Transfers and the Outbound Response?

**Answer:** The Account Transfer Service Release Notes document all Schematron updates and fixes (docID: 85172).

**Question:** Will Centrasite be updated with the most recent version of the Account Transfer BSD?

**Answer:** Centrasite was updated with the most recent BSD version on October 2<sup>nd</sup>.

**Question:** Will the Inbound/Outbound Account Transfer changes apply even if the payload transmitted from the FFM to states was created using Version 2.3.2?

**Answer:** Yes, the new changes will be implemented as part of Version 2.3.2.

**Question:** Who should states contact for follow-up questions?

**Answer:** States should email questions to [DSHAccountTransfer@qssinc.com](mailto:DSHAccountTransfer@qssinc.com) and [Joshua.Volosov@cms.hhs.gov](mailto:Joshua.Volosov@cms.hhs.gov).

### Questions Regarding Specific Application Data Elements

**Question:** Will the FFM transfer accounts to states that do not have primary address information for applicants?

**Answer:** The FFM will send states primary address information for the Primary Contact. However, the elements “nc:LocationPostalCode” and “nc:LocationStateUSPostalServiceCode” are only required to be sent in an Outbound Account Transfer if the “nc:LocationCountryISO3166Alpha3Code” is USA. The overall address rule applies to the Primary Contact regardless of the direction of the Account Transfer. “nc:LocationPostalCode” will only be required for state-initiated Inbound Account Transfer requests if “nc:LocationCountryISO3166Alpha3Code” is USA or absent.

**Question:** If a street address is not available in the Account Transfer from the FFM to the state, what data should be populated in the Outbound Response? Will states receive a street address if the designated country is USA?

**Answer:** The “nc:StreetFullText” data element is required for the Primary Contact and will be included in the Account Transfer from FFM to State.

**Question:** How should states interpret the following rule regarding Account Transfers from the state to the FFM?

```
<sch:assert test="not($is-contact) or $contact-  
info/nc:ContactMailingAddress/nc:StructuredAddress/nc:LocationStreet/nc:StreetFullText[not(  
@xsi:nil=true())]">  
    nc:LocationStreet/nc:StreetFullText is required (and cannot be nilled) for the primary  
contact person [exch:AccountTransferRequest/hix-core:Person/hix-  
core:PersonAugmentation/hix-core:PersonContactInformationAssociation/hix-  
core:ContactInformation/nc:ContactMailingAddress/nc:StructuredAddress/nc:LocationStreet/nc  
:StreetFullText].  
</sch:assert>
```

**Answer:** The Street address is required for Primary Contact. The above assertion in Schematron validates the occurrence of street address for a primary contact.

**Question:** Should the Schematron produce an error if the “locationStreet” data element is removed from Account Transfers from the FFM to the state?

**Answer:** Only Primary Contacts are required to have address information in Account Transfers from the FFM to the state. Other applicants are required to have a home address only if the “hix-ee:InsuranceApplicantFixedAddressIndicator” is set to “True”.

**Question:** If states could previously only accept the “xsd:date” data element, will they need to update the code to accept other data types (e.g., date-time, year, etc.)?

**Answer:** States will need to update their code to accept other date types.

**Question:** Will states be able to receive a “date-time” for the application submission date?

**Answer:** The FFM is no longer specifying what kind of date should be provided for the application submission date. The FFM encourages states to accept date-time because it is more precise.

### **Questions Regarding Exchange Eligibility for Inbound Account Transfers**

**Question:** Do states need to send Medicaid/CHIP eligibility information for eligible applicants to the FFM as part of the Schematron update for Exchange eligibility?

**Answer:** The FFM does not require states to transmit eligibility information to the FFM for applicants that are found eligible for Medicaid/CHIP by the state. However, information not relating to eligibility should be included in the payload for all applicants.

**Question:** How does the FFM differentiate between separate Exchange eligibility elements if some applicants are eligible and others are ineligible?

**Answer:** A referral is not determined by the existence of an Exchange Eligibility element. A referral is determined by the existence of a ReferralActivity element in the Applicant block. All applicants in the application who have a ReferralActivity associated with the Applicant element will be considered referred by the recipient system.

### **Questions asked but not answered during the webinar:**

**Question:** Do states only need to add determination data to Account Transfers from the state to the FFM?

**Answer :** States need to add the determination data and update the ReferralActivityStatusCode in the ReferralActivity of each of the referred applicants to one of the following: “Accepted”, “Rejected”, “PartiallyAccepted” or “ProvisionallyAccepted”.

**Question:** Does the FFM have plans to require “Employer Sponsored Information” in Account Transfers from the state to the FFM?

### **Questions Regarding the State Testing Process for Version 2.3.2**

**Question:** Which environment may states access for testing?

**Answer:** States may access the Formal Environment (IMP1A) and the Informal Environment (TEST2).

**Question:** Have the latest Schematron changes been promoted to the Formal Environment?

**Answer:** The latest Schematron changes have been promoted to the Formal Environment (IMP1A and IMP1B) and are ready for testing. States may test Version 2.3.2 in the Formal Environment throughout October.

**Question:** When should states begin formal testing in coordination with CMS?

**Answer:** CMS strongly recommends that states test Version 2.3.2 in the Formal Environment (IMP1A) during October.

**Question:** If a state is in the process of a Certification Test, or already has performed one, does the state need to retest?

**Answer:** States are not required to retest, but CMS encourages states to do so.

**Question:** Will the FFM require independent verification and validation (IV&V) attestation of successful testing completion?

**Answer:** CMS will provide further guidance to states on IV&V requirements when available.