

# Telephone Applications



**Centers for Medicare & Medicaid Services**  
**August 20, 12:00-1:30 p.m. ET**

Medicaid and CHIP  
**MAC**  
*Learning Collaboratives*

# Agenda



Background



Priority Implementation Strategies



Call Center Operation and Management



Questions?

# Legal Requirements



Consumers may submit their application for Medicaid and CHIP in-person, online, by mail, or **by phone**.



In-Person



Online



By Mail



**By Phone**

**Beginning Oct. 1, 2013 for enrollment beginning Jan. 1 2014, states must establish processes for accepting telephone applications “promptly and without undue delay.”**

# Legal Requirements for Non-MAGI



## Non-MAGI

### **Final Medicaid Regulation: Preamble**

States must make the application process “accessible for all individuals, and maximize the submission options for individuals being evaluated for eligibility on a basis other than MAGI...To the extent practical, those forms should also be accepted by the agency through all acceptable submissions.”

# Experiences with Telephone Applications



**17 States**

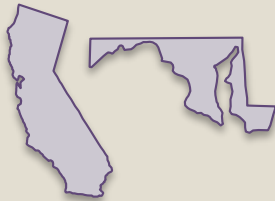
accept telephone applications

**24 States**

accept telephone renewals for  
CHIP or Medicaid



**Wisconsin**, for example, can process applications by telephone and record telephonic signatures



**California** and **Maryland**, for example, have a static telephone application requiring paper-based processing

# Considerations for Telephone Applications



- Enrollment pathway should be simplified and streamlined where consumer has same experience regardless of application modality
- States should be able to process the entire application and determine eligibility for telephone applications
- States are required to accept telephonically recorded signatures

# Agenda

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Background

Priority Implementation Strategies

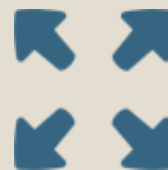
Call Center Operation and Management

Questions?

# Needed Infrastructure to Support a Telephone Platform



**Conduct identity proofing**



**Guide consumer through the application**



**Provide for account management**



**Convey rights and responsibilities**



**Accept telephonic signatures**



**Guide consumer when documentation submission is necessary**



**Memorialize the telephone application**



# Identity Proofing



**To submit an online or telephonic application, the applicant must complete identify proofing sufficient to meet CMS assurance level 2, prior to the disclosure of any information obtained through the Hub.**



- CMS will provide remote identity proofing (RIDP) services to Marketplaces and state Medicaid and CHIP agencies
- The FFM online application will conduct identity proofing prior to account creation
  - If an individual does not meet level two assurance, the representative will continue to collect information, and refer the applicant to a separate call center, associated with the RIDP service, which will provide the opportunity to complete proofing
  - If an individual does not meet level two assurance through the RIDP service or associated call center, the filer will need to submit satisfactory documentation by mail or online in order to proceed
  - Even when identify proofing is not complete, applicant may continue with application information collection
- Paper applicants who do not seek electronic access to the eligibility process need not provide documentation for identity proofing
- RIDP FAQs on CALT: <https://calt.cms.gov/sf/go/doc34792?nav=1>

*States have flexibility on timing, but identity proofing must occur prior to application submission and any real time verifications through the Hub*

# Questions and Discussion

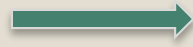


- Identity Proofing
  - What process will states employ for identity proofing over the phone?
  - How will states handle the application when application filer can't meet Level 2 assurance?

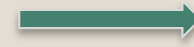
# Account Management: Seamless Application



**Application  
Initiated**



**Application  
Paused**



**Application  
Resumed**

- To gather additional information such as social security number

*States may need to **establish account management processes** to enable the consumer to resume the application seamlessly.*

# Account Management: Account Numbers



1568425

0513214

51156121

0325135

**4658479**

8479584

5132102

4989483

5976138



**Assign an account number or unique user ID once the application is started**



**Maintain call notes on status of application**

# Account Management: Outbound Calling



**Application  
Incomplete**

For applications stopped prior to completion, states may consider **implementing outbound calling capabilities** where call center agents can contact applicants directly to assist in application completion.



This will require an ability to **generate reports** that identify incomplete applications and the pending steps to completion.



Call center agents can use the report as an outlined call list to **follow-up with applicants on specific issues.**



**Application  
Completed**

# Account Management: Modality Transitions



Where possible, states should establish the capability for the application process to **transition across modalities**, to enable consumers to complete the process independently.

- Online and telephonic modes should either use the same system or connected systems so that information gathered in one mode can be picked up in the other.
- On-line and telephonic applications should be able to be printed and, potentially, mailed to the applicant.
- Data from paper based applications should be entered into an online system so that it can be accessed either on-line or by call center employees.

# Questions and Discussion



- **Account Management**

- How are states planning to maintain notes on the applicant that can be used by other call center staff if call needs to be continued?
- Will the call center information be held separately from the individual's on-line account?
  - ✦ If yes, how will the accounts be linked?
  - ✦ If no, will individuals be able to access the notes taken by call center staff?

# Conveying Rights and Responsibilities



*Options for conveying Rights and Responsibilities:*



## **Pre-Recording**

- Press a designated number at the end of the recording acknowledging their acceptance of the Rights and Responsibilities
- Customer may be given option to ask questions



## **Live Reading**

- Representative would read from script
- The script could have general Frequently Asked Q&A

*Escalation path*

*Escalation path*

## **Guided Review**

- Extension of the other options
- Accepted industry practice
- Requires advanced training for the representatives to be well versed in the rights and responsibilities



# Considerations for Conveyance Options



- Consumer must be advised that the individual/family's application will not be complete until they have listened to and accepted the entire Rights and Responsibilities
- A single telephonic signature can be accepted for both Rights and Responsibilities and submission of application.
- Consumer must have access to the rights and responsibilities
  - Written copy of the Rights and Responsibilities could be included in the electronic account
  - State Medicaid Agency or Exchange entity may send a paper copy of the Rights and Responsibilities by mail upon request

# Questions and Discussion



- **Rights and Responsibilities**
  - How will states implement the capability to convey rights and responsibilities?
  - Will call center personnel have ample training to be proficient in discussing the Rights and Responsibilities?

# Telephonic Signatures: Options



A telephonic signature serves as the applicant's legal consent in lieu of a "wet" signature. Regardless of the selected pathway, consideration must be given to how states will retrieve a copy of the telephone signature.

*States have two options:*



## **Record Entire Process**

- Creates enhanced monitoring for quality assurance
- May be a challenge to isolate the telephone signature
- Recording can be stored as audio file or written transcript of the application transaction
- Stored in the Agency system



## **Only Record Signature**

- Less administratively burdensome
- Loses the quality assurance component
- Signature could be stored in the applicant's electronic account as an audio file

# Telephonic Signatures: Additional Implementation Options



There are implementation options for states that do not have recording capability in existing systems without building out new infrastructure

## Outsourced Options

- Cloud based solutions that only require a phone and an internet-enabled computer
- Most vendors offer call recording, storage and logging
- Some offer advanced call center functionality



## Manual Options

- **Induction coil microphone:** attaches to the hand set of a telephone and then plugs into a recording device
- **Inline recording device:** sits between the telephone and the wall jack

*Not a viable long-term solution or option for states expecting high call volumes.*

# Telephonic Signatures: Mitigation Strategies



*Additional options that states have requested CMS consider as short-term mitigation strategies:*



**Allowing the customer service representative to affirm that they received the telephonic signature orally and then check a box affirming that they reviewed the entire application with the applicant and received the telephonic signature.**



**Allowing the use of a signature page which would be sent to the applicant who would be required to return is within a certain time period.**



**Allowing states to employ an interactive voice response (IVR) system that allows callers to select options by pressing buttons or saying a phrase to indicate understanding or signature.**

*These options are under consideration. States can discuss with CMS as part of mitigation plan.*

# Telephonic Signatures: Signature Date



**The application date is the date the applicant wants to sign and submit the application.**

**Consideration for when the telephone application is incomplete such as when it is started and stopped mid-way (whether to obtain additional information).**

# Questions and Discussion



- Telephone Signatures
  - What approaches are states considering to implement the acceptance of telephonic signatures?
  - What mitigation strategies, if any, are being considered?

# Submitting Documentation if Necessary



Applicants may be required to submit documentation to reconcile inconsistencies and verify eligibility

Need mechanism to connect documentation to correct application



Customer service representatives will need:

- *specialized training*
- *a script*
- *Frequently Asked Questions and Answers (FAQ) and process flows*



# Memorializing the Application



Once a telephone application is complete, states should make the application available to the consumer.\*

*States have the following options for memorializing the application:*



## **Copy of Application Summary**

- States may consider sending a copy of the application summary for all telephone applications and not limit this option to consumer requests
- Representative should ask applicant for delivery preference
- Send a paper or electronic copy of the application summary per applicant request.



## **Electronic Account**

- Copy of application summary made available to the consumer through electronic account
- Consumer representatives could provide website, guide client to website, or mail instructions to accessing website and creating an account



## **Paper or E-Notice**

- Send a paper or e-application completion notice
- The notice would serve as proof that the application was submitted and briefly addresses next steps including instructions on how to set up an electronic account and when to expect an eligibility determination.
- Representative should ask applicant for delivery preference.

*\*Length of storage of records should comply with current regulations on application storage.*

# Questions and Discussion



- **Submitting Documents**
  - What training, scripting or FAQs are states considering to provide to call center workers to help guide applicants with submitting documents? What about tools for consumers?
- **Memorializing the Telephone Application**
  - How will states provide a “copy” of the application to consumers?

# Agenda

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Background

Priority Implementation Strategies

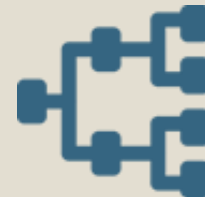
Call Center Operation and Management

Questions?

# Primary Considerations



**Call Center  
Organization**



**Call Center Scripting**



**Telephone Application  
Processing Models**



**Training**

# Call Center Organization



*States have the following options for call center organization:*



## **Integrated System**

- Single number for all Medicaid & CHIP calls
- Single center where staff is trained to handle all needs or an interactive voice response system directs calls to appropriate agent
- All use the same call center and application processing systems and processes
- Provides consistent service approach and is able to achieve economies of scale but takes longer and is more expensive to initially implement
- Need to consider implementation timeframes and costs.



## **Dispersed System**

- States with multiple numbers or call centers will need to grant access to appropriate systems or have the ability to transfer callers (e.g. county based systems)
- Without cross-platform access, it will be necessary to perform a warm transfer, where the caller is introduced and transitioned to the correct agent
- Cross-platform access to call notes still encouraged

*In a State-Based Marketplace, call center operations should be coordinated between the marketplace and the Medicaid and CHIP agency.*

# Telephone Application Processing Model



Medicaid and CHIP agencies may develop their own processes for accepting and adjudicating single streamlined applications. The process for accepting applications by phone must be designed to gather data into a format that will be accessible for an account transfer to the appropriate Marketplace or Insurance Affordability Program.

## Selecting a Telephone Application Process Model:

1. Call-Center Specific System
2. Integrated Call Center and Online Application Systems
3. Non-Integrated Online Application System
4. Static Application (Mitigation Approach)

# Selecting an Application Processing Model



## 1. Call-Center Specific System

- For states seeking to invest in a stand-alone call-center specific system
- Includes all call center functionality that aligns with Insurance Affordability Programs and Qualified Health Plan applications and eligibility determination requirements
- Functionality includes scripting with FAQ flows and special indicators allowing the representative to do specific tasks unique to the applicant

# Selecting an Application Processing Model



## 2. Integrated Call Center and Online Application Systems

- Call center systems and online application system are separate
- However, the scripting application and online application are in sync and the script follows the online system closely so process is aligned



# Selecting an Application Processing Model



## 3. Non-Integrated Online Application System

- Call center agents use same application as that available online to all applicants
- Would not require state Medicaid or CHIP agency to invest in separate, integrated and aligned IT infrastructure but would require call center agents to access and enter information from multiple sources
- For example, an agent may use the online application system to create a new account and start an application, but would also be required to create a new account and enter call notes in a separate call center system

# State Obstacles and Mitigation Strategies



## Possible Obstacles to Implementation

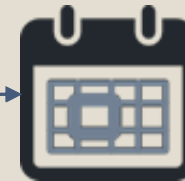


Lack of necessary IT infrastructure or technology to support telephonic applications.



Short timeframes with multiple implementation priorities.

## Mitigation Strategies



### Staged Implementation Potential Option:

Process static applications via telephone in 2014 and transition to live applications when able. Ideally, states should be able to process eligibility determinations via telephones as soon as possible.

# Selecting an Application Processing Model



## 4. Static Application (Mitigation Approach)

- Allows call center agent to complete static application using information collected by phone
- Upon completion of application, application is transferred for eligibility determination, and would receive subsequent notice informing them of the need for additional information
- Expedient solution for states but not a seamless option for consumer
- States implementing such a mitigation approach are responsible for ensuring applications are processed promptly and without undue delay

# Questions and Discussion



- Telephone Application Processing Model
  - What type of model is currently in place?
  - What type of model is being considered?
  - Are any states anticipating the need to employ a static application as a mitigation approach?

# Call Center Scripting



1. Preliminary screening questions that educate the caller about the option to complete an online application and assesses the caller's desire and ability to use the internet to complete their application
  - Direct individuals to the online application or guide the applicant to the website address and assist them in beginning the online application process
  - Information needed before the telephone application is underway
2. Initial contact information if the call is disconnected
3. Estimated amount of time the application call will take to complete
4. Guide account setup and collection of application data
5. Provide answers to frequently asked questions
6. Conveying rights and responsibilities

# Training



- Critical component of the telephone application processes
- May mirror training for Medicaid and CHIP eligibility and enrollment workers who are providing in-person assistance, or may not be as in-depth
- Must address telephone application specific inquiries including, but not limited to:
  - How to set up and access an electronic account
  - When telephone application inquiries should be escalated
  - How to resume a telephone application that has been stopped
  - How to submit necessary documents for verification

# Questions and Discussion



- **Call Center Scripting**
  - What level of scripting is being developed?
  - How will it be implemented (binder, electronic, etc.)
- **Training**
  - What type of employee will be utilized within the call center?
  - What level of training will be provided for call center agents?
  - How much training is planned for call center agents?
  - What staffing levels are anticipated? What is expected turnover?

# Agenda

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Background

Priority Implementation Strategies

Call Center Operation and Management

Questions?





# Questions and Discussion

# Next Steps



**Next Meeting:** Wednesday, August 28, 3-4:30pm ET

**Topic:** All-State Webinar – “Eligibility-Related Determination Notices: A Toolkit for States”

**Feedback/Comments:** Alice Lam, [alam@manatt.com](mailto:alam@manatt.com)