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April 21, 2011

Shelly Murray
State of West Virginia Department of Administration
Purchasing Division
2019 Washing Street East
P.O. Box 50130
Charleston, WV 25305-0130

RE: Request for Information (RFI) No. INS11012, Actuarial and Economic Modeling of West Virginia's Health Insurance Exchange

Dear Ms. Murray:

ACS State Healthcare, LLC (ACS) expresses our continued interest to work with the West Virginia Office of the Insurance Commissioner (WVOIC) on the State's Health Insurance Exchange (Exchange) solution. We are encouraged by the recent release of RFI INS11012 issued by the State of West Virginia Department of Administration, Purchasing Division as an indication of West Virginia's continued efforts toward implementing a sustainable Exchange.

Our understanding of the RFI is that WVOIC is seeking expert advice and information on best approaches for developing and implementing an Exchange for West Virginia. As well, WVOIC is looking to obtain advice on actuarial services, economic modeling, market and consumer research, and development and implementation of a risk adjustment mechanism. At this time, while we wish to be a part of this effort, we do not feel that we are best positioned to provide support to the later set of services. However, we are interested in partnering with the State to develop and implement a sustainable Exchange for providing access to health care for uninsured West Virginians. As such, we are taking this opportunity to:

- Introduce the ACS Team and provide an overview of our qualifications in the eligibility and Exchange arena
- Describe the services we offer to help WVOIC and the Bureau of Medical Services (BMS) in realizing their vision for the West Virginia Exchange
- Provide our thoughts and recommendations related to the integration of the eligibility determination system with the Exchange so that all eligibility, both publicly funded and subsidized, can be processed within a single platform

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The ACS Team

ACS State Healthcare, LLC (ACS) is a wholly owned subsidiary of Affiliated Computer Services, Inc. Our parent company, Affiliated Computer Services, Inc. provides business process outsourcing and information technology services to government and commercial clients worldwide. Based in Dallas, Texas, Affiliated Computer Services was a Fortune 500 and S&P 500 company that was founded in 1988 and became a public company with an initial public offering in 1994. Our parent company Affiliated Computer Services is now a division within Xerox and is known as "ACS, a Xerox company."

ACS State Healthcare, LLC (ACS) is the Affiliated Computer Services affiliate solely focused on government healthcare relationships. Our approximately 3,240 people nationwide are dedicated to assisting our state and federal customers with implementing, operating, and enhancing their public sector healthcare programs. We provide service to government and commercial clients and support more than 1,700 federal, state, county, and local government agencies in all 50 states, the District of Columbia, and Puerto Rico. With the government segment accounting for 40 percent of our revenues, we are the largest provider of services to state and local governments.

We are a leading provider of health and human services operational and administrative services and technology solutions across Medicaid, Child Health Insurance Program (CHIP), and other state government healthcare programs. We have worked with the federal government and individual states to develop, administer, and improve Medicaid eligibility, enrollment, and fiscal agent services. We have been an active partner in improving the processes surrounding health insurance programs for decades.

Our Partners

With so many companies serving the commercial healthcare market today, we wanted to identify key partners to work with us and supplement our capabilities. After reviewing several companies for their technical expertise, their place in the commercial market, and their existing infrastructure to support rapid implementation of an Exchange, we chose two companies to work with us in meeting the requirements of PPACA.

Benefitfocus. Benefitfocus, formed in 2000, is the largest healthcare benefits software provider in the United States, serving over 11 million consumers and more than 329,000 employers. Benefitfocus provides a best-in-class benefit shopping, enrollment, and online billing experience for consumers, employers, and agents on a single Web-based platform.



CHOICE Administrators®. CHOICE Administrators® is the nation's leader in developing and administering health insurance Exchanges, with experience supporting integrated and proven Exchange models since 1996. Currently serving more than 10,000 employers and more than 150,000 members, CHOICE Administrators is a member of The Word & Brown Companies, the nation's leading developer and administrator of consumer-choice Exchange models.

Eligibility and Exchange Offerings

As state entities such as WVOIC and BMS work together to plan for the West Virginia Exchange, we can provide tools to bridge the gap between today's private and commercial insurance environments and the robust access to health care envisioned through PPACA. Our proven Exchange tools for shopping and comparing health plans, determining eligibility for public programs, and paying premiums online create a user-friendly, results-oriented environment for the Exchange. We offer the following advantages to help the State smoothly and efficiently implement an Exchange for West Virginia:

Consumer Focused Approach. We establish a dedicated call center that is responsive to the unique needs of West Virginia. We capitalize on our deep experience with eligibility and enrollment services to deploy strategies that motivate individuals to action.

Strong State Relationships. Through our existing relationships and in-depth knowledge of government healthcare services in 22 states and 40 years of experience working with MMIS and eligibility solutions, we provide solutions that anticipate Exchange opportunities and needs.

Understanding of Commercial and Government Healthcare. We engage leaders in integrated healthcare solutions, including MMIS, enrollment services, Health Information Exchange (HIE), Health Insurance Exchanges, Electronic Health Records (EHR) and coordinated care management. Our people have a passion for healthcare and for helping the citizens of this country with access to gaining affordable healthcare coverage.

Experienced Exchange Team Support. Our knowledge base includes enrollment, eligibility, IT, and operations. We have conducted state-by-state analyses of Exchange and insurer activities and have researched and developed responses for several Exchange Planning Requests for Proposals and performed analysis on grant applications.

Best-of-Practice Partnerships. If needed, we engage our outstanding strategic partners, who already have experience with Exchanges, to supplement the services and capabilities we offer in the Exchange arena.



Our Recommendation for Integrated Eligibility Determination

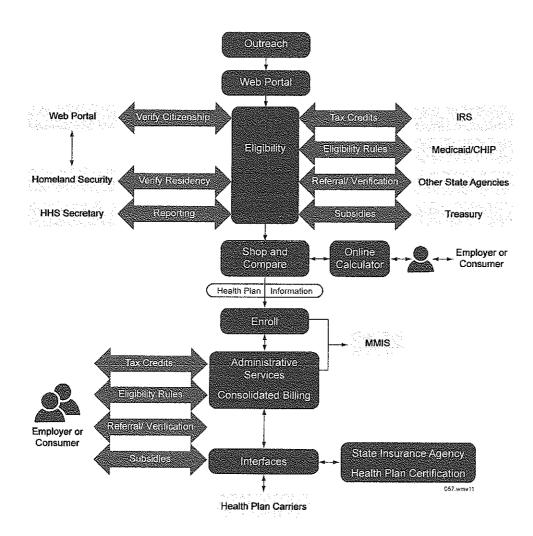
Should the State choose to add the Exchange component as part of the impending MMIS implementation under BMS' responsibility, the State can easily combine both the Medicaid, Individual and Family, CHIP, and Small Group components into a single Exchange solution. Individuals moving from Medicaid to commercial insurance, and back again, are easily tracked within one environment, providing the State with more avenues for reducing the uninsured.

We stand excited and ready to assist the State with integrating eligibility determination within the Exchange as a comprehensive solution; however, we recognize there are several questions that need to be answered before developing any specifications for the Exchange. Decisions such as the governance model for the Exchange, how eligibility determination and MMIS data will interact within the Exchange, and financial sustainability all must be considered by WVOIC and BMS. Perhaps most fundamental is the role the State envisions for the Exchange, as well as the MMIS, as a vehicle for advancing West Virginia's goals related to health care reform, coverage, and population health management.

Interoperability

The Exchange requires a multitude of interfaces and connectivity with other entities and systems. The exhibit below illustrates the complex interoperability required between the Exchange, the MMIS, other State agencies, and verification resources to determine eligibility for publicly funded and subsidized health care. This diagram is just one of many steps in the process to develop a solid set of business and technical specifications for the Exchange implementation.





West Virginia Exchange Interoperability

Integrating eligibility determination within our Exchange solution provides
West Virginians with a consolidated platform to find health insurance and allows the
State to maximize funding opportunities.

This model is based on our existing Medicaid/CHIP eligibility programs and private exchanges operating today. Unlike many eligibility and Exchange vendors, we already know how to operate an Exchange; the ACS Team operates Exchange environments today in California that encompass the eligibility determination, premium processing, and enrollment functions needed for a successful Exchange. Rolling eligibility determination into the Exchange is the smart move for West Virginia, providing a single source for State workers, brokers, navigators, and the public to determine eligibility for coverage under both public and private programs.



Next Steps

Now is the time for the State to look forward and identify ways to maximize grant monies, leverage resources and infrastructure, and streamline access to health care for West Virginia's citizens. We look forward to meeting with the State and its stakeholders to discuss the Exchange, demonstrate our solution, and provide information on how our offerings can assist WVOIC and BMS with achieving their joint vision for providing access to affordable health care coverage for all West Virginians, while maximizing the State's budget dollars and resources.

I am the authorized contact person to speak on behalf of ACS and deploy our team of experts to meet with the State. My contact information is as follows:

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Sincerely,

Will Saunders