



GEORGIA ACCESS HEALTH INSURANCE EXCHANGE • FISCAL YEAR 2024

Office of the Commissioner of Insurance and Safety Fire An Entity of the State of Georgia

Programmatic Audit Report

Greg S. Griffin | State Auditor



DOAA

Georgia Department
of Audits & Accounts

Georgia Access Health Insurance Exchange

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Mr. John F. King, Commissioner
Office of the Commissioner of Insurance and Safety Fire

We have audited the records and operations of the Georgia Access Health Insurance Exchange (Exchange), a division of the State Georgia's Office of the Commissioner of Insurance and Safety Fire (OCI), for the year ended June 30, 2024. Management of the OCI is responsible for the Exchange's compliance with the specified requirements. Our responsibility is to determine the Exchange's compliance with the specified requirements based on our audit objective.

Introduction

On May 2, 2023, Governor Brian P. Kemp signed Senate Bill 65 into law and authorized the Commissioner of Insurance and Safety Fire to create, implement, or operate a state, federal, or partnership exchange or marketplace. The State of Georgia was subsequently approved on July 27, 2023 by the U.S. Centers for Medicare and Medicaid Services (CMS) to operate a State-based Exchange on the Federal Platform (SBE-FP). The State of Georgia's SBE-FP allowed Georgians to shop for and enroll in high-quality, comprehensive, and affordable health insurance while relying on CMS to operate its eligibility and enrollment functions for plan year 2024.

During plan year 2024, the Exchange was responsible for educating consumers, working with agents and community partners to provide consumer assistance, certifying and monitoring qualified health plans (QHPs), and maintaining the integrity of data and the security of personal information. These activities were governed by specific federal regulations, which ensure that state health exchanges are functioning to expand health insurance coverage, reduce the number of uninsured Americans, and improve quality of care.

Audit Objective

The objective of the audit was to verify and report on the Exchange's compliance with programmatic requirements reflected within Title 45 U.S. Code of Federal Regulations (CFR) Part 155, Subpart C (General Functions of an Exchange) and Subpart K (Exchange Functions: Certification of Qualified Health Plans) as directed by CMS for the year ended June 30, 2024.

Audit Scope and Methodology

We were engaged to and performed an audit of the Exchange by comparing actual operations, practices, and results against the federal programmatic requirements of 45 CFR Part 155, Subparts C and K, identifying the specific exchange functions for which the State of Georgia was responsible. Our scope was limited to verifying compliance with those sections of 45 CFR Part 155 that were specifically applicable to the structure of the Exchange as an SBE-FP as follows:

Subpart C – General Functions of an Exchange

- .205 Consumer assistance tools and programs of an Exchange
- .210 Navigator program standards
- .220 Ability of States to permit agents and brokers and web-brokers to assist qualified individuals, qualified employers, or qualified employees enrolling in QHPs
- .225 Certified application counselors
- .260 Privacy and security of personally identifiable information

Subpart K – Exchange Functions: Certification of Qualified Health Plans

- .1000 Certification standards for QHPs
- .1010 Certification process for QHPs
- .1030 QHP certification standards related to advance payments of the premium tax credit and cost-sharing reductions
- .1040 Transparency in coverage
- .1045 Accreditation timeline
- .1050 Establishment of Exchange network adequacy standards
- .1055 Service area of a QHP
- .1075 Recertification of QHPs
- .1080 Decertification of QHPs

We interviewed Exchange personnel and reviewed customer and community partner resources on the Exchange’s website. We performed a review and analysis of the Exchange’s documentation including contracts, agreements, and policies and procedures applicable to the compliance of the objectives.

We conducted this performance audit in accordance with generally accepted governmental auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Planning

Prior to conducting the audit, we determined mutual expectations in performing the engagement and meeting deadlines. We discussed policies and procedures, methodologies, and other relevant aspects of the Exchange’s operations with appropriate staff. We requested various documentation from the Exchange’s staff and discussed with them the date the fieldwork was expected to begin.

Risk Assessment

Our audit approach is risk-based, whereby we assess risk for each identified objective. Depending on the risk assessment, we performed substantive procedures to test the objective. These assessments were made during the planning process and throughout the engagement.

Understanding the Control Environment

We gained an understanding of the Exchange's internal controls related to the SBE-FP, focusing on programmatic compliance requirements. We used a discussion memorandum format to document the relevant processes from start to finish.

Preparation of a Tailored Audit Program

Based upon our planning, risk assessment, and control documentation procedures, audit programs were designed in order for conclusions to be reached for each criteria of the audit objective.

Audit Results

Based on the results of our audit, we conclude that the Exchange is operating in compliance with all applicable programmatic requirements included in 45 CFR Part 155, Subparts C and K. The following are the specific results of our audit:

Subpart C – General Functions of an Exchange

Criteria #1: Determine if the Exchange established a toll-free telephone hotline, an up-to-date website, accessibility for individuals with disabilities and those with limited English proficiency, consumer assistance performed by trained assisters, and outreach and education, as required by 45 CFR Part 155.205.

Procedures:

- a. We reviewed the operation of the Exchange's toll-free telephone hotline and verified that it included the capability to provide information to consumers about eligibility and enrollment processes and appropriately directed consumers to the applicable Exchange website and other applicable resources.
- b. We reviewed the Exchange's website and verified that it included the capability to direct consumers to the federal platform services to apply for, and enroll in, Exchange coverage.
- c. We reviewed the Exchange's website, toll-free hotline, training and outreach/education materials, and policies and procedures and verified that information is provided to individuals living with disabilities and individuals who are limited English proficient in an accessible and timely manner.
- d. We reviewed policies and procedures implemented to ensure that individuals providing consumer assistance are trained regarding QHP options, insurance affordability programs, eligibility, and benefits rules and regulations governing all insurance affordability programs operated in the State, prior to providing assistance.
- e. We reviewed policies and procedures implemented to ensure that outreach and education activities were conducted to educate consumers about the Exchange and insurance affordability programs to encourage participation and individuals conducting outreach and education activities are trained appropriately.

Results: We found no exceptions as a result of these procedures.

Criteria #2: Determine if the Exchange established a Navigator program through which it awards grants to eligible public or private entities or individuals, as required by 45 CFR Part 155.210.

Procedures:

- a. We reviewed the Exchange's Navigator standards to determine if standards were publicly disseminated and met appropriate requirements.
- b. We tested all Navigator grant agreements to ensure that the agreements contained all required components and verified at least one Navigator grant was provided to one of the specified organization types.
- c. We reviewed the general ledger to verify that federal funds were not utilized to provide Navigator grants.

Results: We found no exceptions as a result of these procedures.

Criteria #3: Determine if the Exchange limited the information on its website regarding licensed agents and brokers to those who have completed appropriate registration and training, as required by 45 CFR Part 155.220.

Procedure: We reviewed the Exchange's website to identify the population of licensed agents, brokers, and web-brokers reflected and selected a sample of the agents, brokers, and web-brokers to ensure that they were licensed and completed required registration and training.

Results: We found no exceptions as a result of this procedure.

Criteria #4: Determine if the Exchange established a certified application counselor program that complies with certain requirements reflected in 45 CFR Part 155.225.

Procedure: We tested a sample of agreements with organizations performing certified application counselor services to ensure that the agreements contained all required components.

Results: We found no exceptions as a result of this procedure.

Criteria #5: Determine if the Exchange established specific procedures to ensure the privacy and security of personally identifiable information, as required by 45 CFR Part 155.260.

Procedures:

- a. We reviewed the Exchange's policies associated with privacy and security of personally identifiable information and verified all requirements were met.
- b. We tested a sample of agreements/contracts with non-Exchange entities to ensure that the agreements/contracts contained appropriate privacy and security clauses.

Results: We found no exceptions as a result of these procedures.

Subpart K –Exchange Functions: Certification of Qualified Health Plans

Criteria #6: Determine if the Exchange established procedures for the certification and monitoring of QHPs consistent with federal regulations reflected in 45 CFR Part 155.1000, 1030, 1040, 1045, 1050, and 1055.

Procedures:

- a. We reviewed the Exchange's policies and procedures for certification and monitoring of QHPs to determine if the policies and procedures met appropriate requirements.
- b. We obtained a listing of QHP issuers and tested a sample of QHP certifications to ensure appropriate requirements were met.

Results: We found no exceptions as a result of these procedures.

Criteria #7: Determine if the Exchange established a process for recertification of QHPs that meets federally-prescribed standards reflected in 45 CFR Part 155.1075.

Procedures:

- a. We reviewed the Exchange's policies and procedures for recertification of QHPs to determine if the policies and procedures met appropriate requirements.
- b. We requested a listing of QHPs that were recertified and determined that no plans were recertified for plan year 2024.

Results: We found no exceptions as a result of these procedures.

Criteria #8: Determine if the Exchange established a process for decertification of QHPs that meets federally-prescribed standards reflected in 45 CFR Part 155.1080.

Procedures:

- a. We reviewed the Exchange's policies and procedures for decertification of QHPs to determine if the policies and procedures met appropriate requirements.
- b. We requested a listing of QHPs that were decertified and determined that no plans were decertified for plan year 2024.

Results: We found no exceptions as a result of these procedures.

Auditee's Response: OCI agrees with the report.

Communication of Audit Findings and Recommendations

No matters were reported.

Respectfully submitted,



Greg S. Griffin
State Auditor

May 29, 2025