



To Management
Rhode Island Health Benefits Exchange

We have examined the assertion of compliance of Rhode Island Health Benefits Exchange d/b/a HealthSource RI (HSRI or the Exchange), a function within the State of Rhode Island, with the requirements in Title 45, Code of Federal Regulations Part 155 (45 CFR 155), Subparts C, D, E, K, and M for the year ended June 30, 2022. We noted the matters below for your consideration.

Eligibility Verification

Verification Process Related to Eligibility for Enrollment in a Qualified Health Plan through the Exchange

BerryDunn tested a sample of 60 cases for proper verification data. In one case tested, the data indicated that when the Exchange verified the self-attested data for lawful presence with the Federal Hub the status was returned as a 'FAIL'. However, the Federal Hub system data showed an 'Unexpected Exception occurred at Trusted Data Source' message for this applicant, indicating that there was a system error and verification of lawful presence was unable to be completed. In response to the 'FAIL' verification flag, the Exchange generated an Additional Documentation Required (ADR) notice for the applicant. The ADR was not sent to the applicant.

The Exchange identified 222 additional cases where an ADR notice was generated for an applicant that had a 'FAIL' status for lawful presence and the Federal Hub data showed an 'Unexpected Exception occurred at Trusted Data Source' error message.

According to **45 CFR § 155.315**:

When electronic data to support the verifications specified in §155.315(d) or §155.320(b) is required but it is not reasonably expected that data sources will be available within 1 day of the initial request to the data source, the Exchange must accept the applicant's attestation regarding the factor of eligibility for which the unavailable data source is relevant.

We recommend the Exchange identify the cause and meaning of the Federal Hub response 'Unexpected Exception occurred at Trusted Data Source' and develop a process that aligns with 45 CFR § 155.315 to verify the applicant's self-attested data.

Management's Response

HSRI acknowledges the observation and is currently working with our systems integration vendor to investigate the treatment of verification data points when an 'Unexpected Exception occurred at Trusted Data Source' is returned. HSRI will work to deploy a code fix to ensure that applicant's attestation is used when it is not reasonably expected that data sources will be available within 1 day of the request as prescribed by **45 CFR § 155.315**.

Responsible: Matt Goupil, COO

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We sincerely appreciate the cooperation and courtesy provided to our personnel by management and the employees of HSRI during the engagement. We have previously discussed the comments and suggestions contained herein with management, and we will be pleased to discuss them further at your request.

This report is intended solely for the information and use of management and is not intended to be, and should not be, used by anyone other than this specified party.

Berry Dunn McNeil & Parker, LLC

Portland, Maine
May 15, 2023