

New York Health Benefit Exchange

Blueprint Submission for Sections 2.6 and 2.7: Navigators and In Person Assistance October 26, 2012

| <u>Item Number</u> | <u>Topic</u> |
|--------------------|--|
| 2.6 | Description of Navigator program |
| 2.6a | Establish a Navigator program |
| 2.6b | Navigator funding & types of Navigator entities |
| 2.6c | Training and Conflict of Interest Standards for Navigators |
| 2.7 | In-person assistance program |

Overview

The State of New York currently operates several successful consumer assistance programs to assist eligible individuals obtain information about, and enroll in, health insurance programs. To date, most of the assistance has been geared towards individuals eligible for public insurance. With the launch of the Exchange, there will be additional support for individuals enrolling in Qualified Health Plans in the New York State Health Benefit Exchange. Through its In Person Assistor and Navigator programs, the Exchange will integrate these new and existing consumer assistance programs to provide high quality consumer assistance.

Description and Timeline of Navigator and In Person Assistance Programs

The New York State Health Benefit Exchange will operate a Navigator program and an In Person Assistance (IPA) program. Through stakeholder meetings and convenings of the Exchange's Regional Advisory Committee, the Exchange has solicited input about the design and delivery of Navigator and IPA services. The programs will provide in-person, multilingual application assistance to children and adults applying for New York State sponsored health insurance programs, qualified health plans and standalone plans in the New York State Health Benefits Exchange, and as well as federally sponsored Advanced Premium Tax Credits (APTCs) and cost-sharing benefits in the New York State Health Benefits Exchange. By contracting with organizations that are culturally and linguistically appropriate to the populations they serve, the Navigator and IPA programs will reach individuals who have minimal access to public and commercial insurance programs. The Navigator and IPA programs are being designed to eliminate barriers in accessing the application process by providing in person assistance in community based locations frequented by target populations, at times that are convenient to working families, including evenings and weekends. Navigators and IPAs will provide all duties specified in 45 CFR 155.210(e).

The IPA/Navigator program will take a "no wrong door" to consumer assistance. IPAs and Navigators will be trained to provide outreach, education and enrollment assistance for public health insurance programs and QHPs in the Exchange. IPAs and Navigators will be trained on handoffs to 1) other consumer assistance resources for public programs and the Exchange (such as the call center); and 2) appropriate referral sources for individuals not eligible for public programs or

QHPs (such as Medicare resources). Handoff protocols will be developed in the next four to six months and will be incorporated into the IPA/Navigator training program.

The In Person Assistor program will commence in late summer or early fall of 2013. The Navigator program will commence on a date to be determined, but no later than January 1, 2014. There will be no difference in the activities of In Person Assistors and Navigators and it is expected that any entity providing IPA services would also be able to provide Navigator services. The funding for the Navigator and IPA program will come from separate sources (see below).

Role of Navigators and In Person Assistors in the SHOP

Per the federal guidelines, IPAs/Navigators will have a role in the SHOP Exchange. The Exchange will work collaboratively with brokers to coordinate the efforts of brokers and IPAs/Navigators in the SHOP. Progress will be made on this topic over the next four to six months.

Funding

Federal 1311 funds will be used to develop training programs for the Navigator program and the IPA Program. The operating activities of the Navigator program will be funded with revenue from the Exchange. The operating activities of the IPA program will be funded with federal 1311 funds, but will be cost-allocated as appropriate for public program assistance.

The Exchange is developing an annual budget for the Navigator and IPA Program. The budget will be integrated into the Exchange's self-sustainability analysis.

Types of Entities

The New York State Health Benefit Exchange will select Navigator and IPA entities through a competitive procurement process. The RFA will specify minimum standards and preferred characteristics of Navigator and IPA entities. The award process for the RFA will consider the needs of New Yorkers with regard to regional coverage and cultural and linguistic competence. The award structure will also ensure that the Exchange meets the federal requirement to select at least one community and consumer-focused nonprofit group and one or more of the other types of permissible entities listed in 45 CFR 155.210(c)(2). We expect the Request for Applications (RFA) to be posted in late fall. The procurement process is further detailed in the attached work plan.

The New York State Health Benefit Exchange will also permit Local District Social Service Agencies (LDSS) to serve as In Person Assistors. The LDSS will determine eligibility for Medicaid, and those applicants found ineligible for Medicaid will have their application information transmitted through the online eligibility system to the Exchange for evaluation for APTC eligibility.

Training

IPAs/Navigators will receive comprehensive training that includes:

- The needs of underserved and vulnerable populations
- Cultural and linguistic competency
- Eligibility and enrollment rules and procedures
- The range of QHP options and insurance affordability programs, including APTCs and CSRs
- Other private insurance
- The privacy and security standards applicable under §155.260

- Conflict of interest standards

Training will be provided through an existing contact with Maximus. The New York State Department of Health and the New York State Health Benefit Exchange have a longstanding relationship with Maximus to manage the New York Health Options Call Center. By providing training to its own call center workers, Maximus has experience in curriculum development and training delivery for consumer assistors. Extensive training will be provided to IPAs/Navigators before they begin to provide IPA/Navigator services. Training will also be provided on an ongoing basis to all IPAs /Navigators.

Conflicts of Interest

The RFA will clearly spell out, and hold IPAs and Navigators accountable to, strong conflict of interest standards. These standards are being developed and the Conflict on Interest Policy may include the following:

- A statement attesting that the applicant and its subcontractors are none of the entities prohibited from serving as In Person Assistors/Navigators.
 - Insurers and their subsidiaries.
 - Provider entities (including, but not limited to, hospitals, clinics, and physician practices) that are directly or indirectly owned by, or exclusively contract with, a single insurer or its subsidiaries.
 - Associations and their subsidiaries that include members of, or lobby on behalf of, the insurance industry
 - Entities receiving direct or indirect consideration from insurers in connection with the enrollment of any individuals or employees in a Qualified Health Plan or a non-Qualified Health Plan.
 - Brokers or agents that opt to serve as IPAs/Navigators may not receive direct or indirect compensation or other consideration from health insurers or their subsidiaries. Such consideration includes, but is not limited to, commissions for renewals, pension income, and other sources of income from health insurers.
- Applicants and their subcontractors which receive direct or indirect consideration from a health insurer that is not in connection with enrollment in a health plan, will be required to provide the monetary or other value of such consideration and the percentage of total revenue that comes from such sources, the terms and conditions for receiving such consideration and a plan to ensure that this consideration will not pose a conflict of interest for the entity to serve as an IPA/Navigator. The applicant will be disqualified if NYSDOH deems the conflict of interest mitigation plan to be insufficient.
- Applicants and their subcontractors which have an ownership stake or other investments in a health insurer or its subsidiaries, will be required provide an itemized list of such investments, the percentage of the total investment portfolio dedicated to such investments, and a plan to ensure that this investment will not pose a conflict of interest for the entity to serve as an IPA/Navigator. The applicant will be disqualified if NYSDOH deems the conflict of interest mitigation plan to be insufficient.
- A statement indicating how the applicant and its subcontractors will ensure that employees providing Navigator/IPA services will adhere to the same conflict of interest standards described in the preceding three paragraphs. The applicant will be disqualified if NYSDOH deems the conflict of interest mitigation plan to be insufficient.
- Applicants should also indicate if their employees that provide Navigator/IPA services or their subcontractors' employees that provide Navigator/IPA services have any immediate family members who are employed by the following entities:
 - Insurers or their subsidiaries.
 - Provider entities (including, but not limited to, hospitals, clinics, and physician practices) that are directly or indirectly owned by, or exclusively contract with, a single insurer or its subsidiaries.
 - Associations and their subsidiaries that include members of, or lobby on behalf of, the insurance industry.
 - Entities receiving direct or indirect consideration from insurers in connection with the enrollment of any individuals or employees in a Qualified Health Plan or a non-Qualified Health Plan.
 - Broker or agent entities that enroll individuals and/or small businesses in health insurance products.

- NYSDOH reserves the right to require awardees to disclose potential conflicts of interest to consumers. Applicants should include a statement indicating how they would disclose potential conflicts of interest to consumers.
- NYSDOH will monitor IPA/Navigator assisted enrollment. Contracts with IPAs/Navigators will permit audits by NYSDOH and other authorized entities.

Privacy and Security Standards

The RFA will define the privacy and security standards for IPAs/Navigators. Training for IPAs/Navigators will also cover this topic.

Next Steps

1. The Exchange will determine a budget for Navigator and IPA programs.
 - a. Budget considerations are included in the Exchange's sustainability analysis
2. The Exchange will move forward with the procurement for Navigator and IPA services.
3. The Exchange will develop a task order for Maximus to provide training to Navigator and IPA entities.
 - a. Develop training curriculum for Navigator and IPA entities.
4. The Exchange will determine licensing and/or certification standards for Navigators and IPAs.
5. The Exchange will designate staff to oversee the Navigator and IPA programs.
6. Determine the role of Navigators in the SHOP.

IPA/Navigator Workplan

| TASK/DETAILS | TIMEFRAME |
|--|-----------|
| 1. Stakeholder Outreach | |
| <ul style="list-style-type: none"> • Stakeholder Meetings • Regional Advisory Committees | Ongoing |

| TASK/DETAILS | TIMEFRAME |
|---|---------------|
| 2. Procurement Process for IPA/Navigator Program | |
| (n.b. there will be a separate procurement process for LDSS and for other IPAs/Navigators) | |
| Develop and Submit B1184 Spending Request for Approval | October 2012 |
| Develop Criteria for IPA/Navigator Program, including conflict of interest and training standards | October 2012 |
| Draft RFA/Circulate for Comment | October 2012 |
| Obtain Executive Deputy Clearance for RFA Release | November 2012 |
| Develop RFA Mailing List and Cover Letter for RFA Release | October 2012 |
| Develop Scoring Tool and Review Process and Establish Review Teams | October 2012 |
| Obtain Approval for Internet Posting/ Prepare PDF of Files for Website | November 2012 |
| Develop/Submit Notice Contract Reporter (2 weeks before release of RFA) | November 2012 |
| Due Date for Submission of Technical Questions | January 2013 |
| Post Questions on the DOH Website | February 2013 |
| Train Proposal Reviewers on Scoring Process | February 2013 |
| Proposal Due Date | March 2013 |
| Proposals Logged and Distributed for Review | March 2013 |
| Proposal Review Completed/Award Recommendation Package Compiled | April 2013 |
| B1184 Spending Request Submitted for Approval | April 2013 |

| | |
|---|------------|
| Executive Deputy Clearance for Award Package Submitted for Approval | April 2013 |
| Award(s) Announced | May 2013 |
| Contract Sent to Successful Applicant(s) | May 2013 |
| Grant Award Package Prepared | April 2013 |
| Contract Returned by Successful Applicant(s) | May 2013 |
| Contract Processed Internally and Sent to OSC for Approval | May 2013 |
| Contract Approved/ Fully Executed by OSC | July 2013 |

| TASK/DETAILS | TIMEFRAME |
|---|---------------|
| 3. Contract Amendment for Training Contractor | |
| Determine Funding Request for IPA/Navigator Training Component | October 2012 |
| Submit B1184 Spending Request to Amend Training Contract for Approval | October 2012 |
| Develop Contract Amendment | October 2012 |
| Obtain Approvals on DOH 2333 | November 2012 |
| Send Contract Amendment to Training Contractor for Signature | November 2012 |
| Contract Processed Internally and Sent to OSC for Approval | December 2012 |
| Contract Fully Executed by OSC | February 2013 |

| TASK/DETAILS | TIMEFRAME |
|---|-------------------|
| 4. Development of Training Curriculum for IPA/ Navigator Program | |
| Review Existing Curriculum to Determine what Information Can be Used and what Changes are Necessary | October 2012 |
| Determine What Areas Need to be Added to Existing Curriculum (For Example, MAGI Rules, QHP Options, Privacy and Security Standards) | October 2012 |
| Meet with Training Contractor to Discuss New Curriculum that Needs to be Developed | Nov/December 2012 |
| Contractor Develops and Submits Updated Training Material for Approval | Jan/February 2013 |

| | |
|---|----------------|
| Review and Provide Comments on Training Material | March 2013 |
| Training Curricula Finalized | April 2013 |
| Trainer Delivers Pilot/Demonstration of Training Module to DOH Staff | April/May 2013 |
| Training Contractor Reserves Dates/Locations for In-Person IPA/Navigator Training | April/May 2013 |
| In Person Training Delivered to Successful IPAs/Navigator(s) | Aug/Sept 2013 |
| Trainer Develops Webpage on DOH Training Site Dedicated to IPAs/Navigators | August 2013 |
| Trainer Develops Webinar-Based Training for IPAs/Navigators | August 2013 |

| TASK/DETAILS | TIMEFRAME |
|---|------------------|
| 5. IPA/Navigator Contractor(s) | |
| Recruit and Hire Staff | July/August 2013 |
| Attend DOH Sponsored IPA/Navigator Training | Aug/Sept 2013 |
| Contractor(s) Begin Offering Services | October 2013 |

| TASK/DETAILS | TIMEFRAME |
|---|------------------|
| 6. Planning for Sustainability | |
| Developing timeline and strategy for funding the Navigator program in 2014 and beyond | Fall 2012 |