

New York Health Benefit Exchange

Implementation Review Sections 2.0 Consumer and Stakeholder Engagement August 13, 2013

<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 New York State Health Benefit Exchange will operate a Navigator program and an In Person Assistance (IPA) program in accordance with all federal regulations. Through stakeholder meetings and convenings of the Exchange's Regional Advisory Committee, the Exchange -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 Benefit Exchange, as well as federally sponsored Advanced Premium Tax Credits (APTCs) and cost-sharing benefits in the New York State Health Benefit 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 programs will also provide assistance to small businesses and their employees. 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" approach to providing consumer assistance. IPAs and Navigators will be trained to provide 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 coming weeks and will be incorporated into the IPA/Navigator training program.

Certified trained assistors will be available to assist applicants in early fall of 2013. 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).

All IPA/Navigator entities will be required to provide services for potential enrollees in the Individual Exchange and in the SHOP.

IPA/Navigator Awards

The New York Health Benefit Exchange issued a Request for Applications for its IPA/Navigator program on February 13, 2013: <http://www.health.ny.gov/funding/rfa/1301300317/index.htm>

Applications for the IPA/Navigator program were due on April 8, 2013. Through this competitive procurement, the Exchange selected entities to provide IPA/Navigator services in a manner that complies with New York State procurement law and all federal regulations and ensures that potential enrollees receive high-quality enrollment assistance. Awards conditioned on final contract approval by the Office of the State Comptroller as required by state finance law were made to 50 lead organizations (grantees) and were announced on July 12, 2013. Grantees represent a diverse group of organizations that will provide high-quality enrollment assistance in all 62 counties of the state and include more than 96 subcontractors. Grantees and their subcontractors will employ more than 430 individual IPAs/Navigators, who will provide services in a total of 48 languages. A list of conditional awardees and award amounts is attached. With the exception of one small county in upstate New York (Yates County), all counties will have at least some IPA/Navigator organizations and some counties will have up to eight IPA/Navigator organizations, ensuring consumer choice in selecting an IPA/Navigator. Approval of the contracts by the Office of the State Comptroller is expected in August 2013.

- A map of conditional awardees, by service area, is available on our website:
<http://www.healthbenefitexchange.ny.gov/IPANavigatorMap>
- A list of lead agencies and their subcontractors, by county, is also available on our website:
<http://www.healthbenefitexchange.ny.gov/IPANavigatorMap>

All types of entities permitted by federal regulations to serve as IPAs/Navigators were permitted to apply for funding. The selected lead and subcontracting agencies represent the diversity of New York with regard to the communities they serve and the language in which they will provide service. There is also diversity in the types of lead and subcontracting agencies, including but not limited to: community and consumer focused nonprofits, chambers of commerce, federally qualified health centers and hospitals, service providers, resource partners of the Small Business Association, county health departments, and one Urban Indian organization. A monthly site schedule will be submitted by each IPA/Navigator organization including the location of staff in the community, the hours of availability and the languages spoken. The site schedule will be publicly available on the website allowing consumers to locate the IPA/Navigator of their choice and permitting other organizations to easily make referrals to IPA/Navigator sites.

Funding

Federal 1311 funds have been 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 and cost allocated to public programs. 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 has developed an annual budget for the Navigator and IPA Program. The budget will be integrated into the Exchange's self-sustainability analysis. A strategy for funding the NYHBE Navigator program will be a critical component of the Exchange's long-term budget and sustainability plan. Please refer to section 8.1 of the Blueprint for additional information.

Conflicts of Interest

The RFA included a robust approach towards limiting conflicts of interest amongst IPAs/Navigators. All applicants were required to disclose potential conflicts of interest in their applications. See pages 31-33 of the RFA for details. In accordance with 45 CFR 155.215, all IPAs/Navigators will be required to disclose to the NY Marketplace and to consumers, in plain English:

- any lines of insurance business, not covered by the restrictions on participation and prohibitions on conduct in 45 CFR 155.210(d) which the IPA/Navigator intends to sell while carrying out the consumer assistance functions;
- any existing employment relationships, or any former employment relationships within the last 5 years, with any health insurance issuers or issuers of stop loss insurance, including any existing employment relationships between a spouse or domestic partner and any health insurance issuers or issuers of stop loss insurance, or subsidiaries of health insurance issuers or issuers of stop loss insurance; and
- any existing or anticipated financial business, or contractual relationships with one or more health insurance issuers or issuers of stop loss insurance, or subsidiaries of health insurance issuers or issuers of stop loss insurance.

Training

IPAs/Navigators will receive comprehensive training that adheres to federal requirements. The training curriculum includes the following modules and a sample of draft materials will be provided to CCIIO:

- Introduction to the ACA and the New York Marketplace
- Privacy and Security, including the standards of CFR 155.260. Recommendations provided by the IRS during their July 2013 site visit have been incorporated into the module.

- IPA/Navigators Roles and Responsibilities, including conflicts of interest, linguistic and cultural competency, disability accessibility, and best practices for providing high quality customer service
- Basic Health Insurance Terms and Understanding the Range of QHP options and Insurance Affordability Programs available through the NY Marketplace
- The Individual Marketplace, including eligibility and enrollment rules and procedures
- Helping Consumers Select a Health Plan
- SHOP Marketplace, including eligibility and enrollment rules and procedures
- IPA/Navigator Resources for navigating the New York Marketplace portal
- Appeals and Complaints

Training will be provided under an existing contact with MAXIMUS. The New York State Department of Health has 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.

All IPAs/Navigators must complete three days of in-person training and two online training modules, as well as an assessment, in order to receive certification. Training will be offered at four locations throughout the state: Buffalo, Syracuse, Albany and New York City. Training sessions will commence in late August and will run through early October. Additional follow-up training will also be provided on an ongoing basis to all IPAs /Navigators.

Oversight and Monitoring

The New York Marketplace has a comprehensive oversight and monitoring plan for the IPA/Navigator programs:

- All awardees and their subcontractors were required to complete the Vendor Responsibility Questionnaire (VRQ) in the New York State VendRep System and are required to update their VRQ at least every six months. The information was used by the Marketplace and is used by all State agencies to determine whether or not the entity is and remains “responsible” as defined in NYS State Finance Law. The VRQ assesses vendor integrity and sample questionnaires are available here: http://www.osc.state.ny.us/vendrep/forms_vendor.htm
- Prior to receiving a final contract, all nonprofit conditional awardees must prequalify in the New York State Grants Gateway. The Grants Gateway questionnaire requests an upload of basic organizational documents and asks straightforward questions about a not-for-profit’s capacity and integrity.

- All awardees will be required to submit periodic progress reports and monthly expenditure reports. The progress report will include information such as the names of IPA/Navigators and languages spoken by each IPA/Navigator, the number of applications taken per full time equivalent per week, the number of days to schedule an appointment with an IPA/Navigator, a list of presentations provided including the target audience and the number of people in attendance and the number and list of small businesses assisted. Awardees will also include information in their progress report about specific concerns or barriers they are facing as well as successes and best practices. Awardees will also be required to submit a monthly site schedule for their IPAs/Navigators.
- The Exchange's call center will monitor and collect any complaints received about IPAs/Navigators.

Next Steps

1. Execute final contracts with the contingent awardees and obtain all necessary State approvals. Expected in late August 2013.
2. Deliver training to, and certify, Navigators and IPAs.

IPA/Navigator Workplan

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

TASK/DETAILS	TIMEFRAME
2. Procurement Process for IPA/Navigator Program	
Develop and Submit B1184 Spending Request for Approval	Complete
Develop Criteria for IPA/Navigator Program, including conflict of interest and training standards	Complete
Draft RFA/Circulate for Comment	Complete
Obtain Executive Deputy Clearance for RFA Release	Complete
Develop RFA Mailing List and Cover Letter for RFA Release	Complete
Develop Scoring Tool and Review Process and Establish Review Teams	Complete
Obtain Approval for Internet Posting/ Prepare PDF of Files for Website	Complete
Develop/Submit Notice Contract Reporter (2 weeks before release of RFA)	Complete
Due Date for Submission of Technical Questions	Complete
Post Questions on the DOH Website	Complete
Train Proposal Reviewers on Scoring Process	Complete
Proposal Due Date	Complete
Proposals Logged and Distributed for Review	Complete
Proposal Review Completed/Award Recommendation Package Compiled	Underway
B1184 Spending Request Submitted for Approval	Complete
Executive Deputy Clearance for Award Package Submitted for Approval	Complete

Contract Sent to Successful Applicant(s)	Complete
Grant Award Package Prepared	Complete
Contract Returned by Successful Applicant(s)	Underway
Contract Processed Internally and Sent to OSC for Approval	Underway
Contract Approved/ Fully Executed by OSC	Underway
Award(s) Announced	Complete

TASK/DETAILS	TIMEFRAME
3. Contract Amendment for Training Contractor	
Determine Funding Request for IPA/Navigator Training Component	Complete
Develop Task Order for Training Contractor	Complete
Sign Task Order for Training Contractor	Complete

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	Complete
Determine What Areas Need to be Added to Existing Curriculum (For Example, MAGI Rules, QHP Options, Privacy and Security Standards)	Complete
Meet with Training Contractor to Discuss New Curriculum that Needs to be Developed	Complete
Contractor Develops and Submits Updated Training Material for Approval	Underway
Review and Provide Comments on Training Material	Underway
Training Curricula Finalized	Underway
Training Contractor Reserves Dates/Locations for In-Person IPA/Navigator Training	Complete

In Person Training Delivered to Successful IPAs/Navigator(s)	Aug/Sept/Oct 2013
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TASK/DETAILS	TIMEFRAME
5. IPA/Navigator Contractor(s)	
Recruit and Hire Staff	Complete
Attend DOH Sponsored IPA/Navigator Training	Aug/Sept/Oct 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	Underway