

## **New York Health Benefit Exchange**

### **Blueprint Submission for Sections 2.6 and 2.7: Navigators and In Person Assistance Updated May 23, 2013**

<b><u>Item Number</u></b>	<b><u>Topic</u></b>
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 Health Benefit Exchange issued a Request for Applications for its IPA/Navigator program on February 13, 2013. Applications for the IPA/Navigator program were due on April 8, 2013. Contracts for the program will be awarded in July 2013. Through this competitive procurement, the Exchange will select entities to provide IPA/Navigator services in a manner that complies with all federal regulations and ensures that potential enrollees receive high-quality enrollment assistance. The complete application can be viewed here:

<http://www.health.ny.gov/funding/rfa/1301300317/index.htm>

#### **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 in accordance with all federal regulations. 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 Benefit Exchange, and 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 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 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.

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

As indicated in the IPA/Navigator RFA, all IPA/Navigator entities will be required to provide services for potential enrollees in the Individual Exchange and in the SHOP.

#### 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 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.

#### Types of Entities

The New York State Health Benefit Exchange will select Navigator and IPA entities through a competitive procurement process. The RFA specifies minimum standards for Navigator and IPA entities. The award process for the RFA considers the needs of New Yorkers with regard to regional coverage and cultural and linguistic competence. All types of entities permitted by federal regulations to serve as IPAs/Navigators were permitted to apply for funding. Awards will be made to at least two types of entities, one of which will be a community and consumer-focused nonprofit organization.

#### Training

IPAs/Navigators will receive comprehensive training that adheres to federal requirements and, at a minimum, includes modules on:

- 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 includes a robust approach towards limiting conflicts of interest amongst IPAs/Navigators. All applicants must provide the following. This list will be adapted, as needed, to adhere to federal regulations.

- 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.
  - Provider entities (including, but not limited to, hospitals, clinics, and physician practices) that directly or indirectly **own** 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 health plan or supplementary 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 must either: 1) attest that they do not receive direct or indirect consideration from a health insurer that is not in connection with enrollment in a health plan or supplementary plan; or 2) 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 DOH deems the conflict of interest mitigation plan to be insufficient.
- Applicants and their subcontractors must either: 1) attest that they do not have an ownership stake or other investments in a health or supplementary insurer or its subsidiaries; or 2) provide an itemized list of such investments, the monetary value 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 DOH 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 DOH 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.
- Provider entities (including, but not limited to, hospitals, clinics, and physician practices) that directly or indirectly own 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 health plan or supplementary plan.
- Broker or agent entities that enroll individuals and/or small businesses in health insurance products.

Awardees will be expected to update this information annually and as new IPA/Navigator staff are hired.

- DOH 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.
- DOH will monitor IPA/Navigator assisted enrollment. Contracts with IPAs/Navigators will permit audits by DOH and other authorized entities.

#### Privacy and Security Standards

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

#### Next Steps

1. The Exchange will award contracts to successful applications to provide IPA/Navigator services.
  2. Complete the training curriculum for Navigator and IPA entities.
  3. The Exchange will determine certification standards for Navigators and IPAs.
  4. The Exchange will designate staff to oversee the Navigator and IPA programs.
  5. The Exchange will develop a funding strategy for the Navigator program.
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**IPA/Navigator Workplan**

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

<b>TASK/DETAILS</b>	<b>TIMEFRAME</b>
<b>2. Procurement Process for IPA/Navigator Program</b>  (n.b. there will be a separate procurement process for LDSS and for other IPAs/Navigators)	
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	May 2013

Contract Sent to Successful Applicant(s)	May/June 2013
Grant Award Package Prepared	May 2013
Contract Returned by Successful Applicant(s)	June 2013
Contract Processed Internally and Sent to OSC for Approval	June 2013
Contract Approved/ Fully Executed by OSC	July 2013
Award(s) Announced	July 2013

TASK/DETAILS	TIMEFRAME
<b>3. Contract Amendment for Training Contractor</b>	
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
<b>4. Development of Training Curriculum for IPA/ Navigator Program</b>	
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
Trainer Delivers Pilot/Demonstration of Training Module to DOH Staff	July 2013
Training Contractor Reserves Dates/Locations for In-Person IPA/Navigator Training	Underway

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
<b>5. IPA/Navigator Contractor(s)</b>	
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
<b>6. Planning for Sustainability</b>	
Developing timeline and strategy for funding the Navigator program in 2014 and beyond	Underway