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# **Connect for Health Colorado**

## **Certified Application Counselor Program Announcement and Designated Organization Application Guidelines**

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August 20th, 2013

**Application deadline: September 30, 2013**

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## 1.0 Purpose of Announcement

Connect for Health Colorado is establishing a Certified Application Counselor Program to designate organizations throughout the state that will provide application assistance to consumers seeking health coverage and financial assistance paying for health coverage through our new health insurance marketplace. The Certified Application Counselor Program is an unfunded initiative that will establish designated organizations as Connect for Health Colorado partners to support our efforts to provide access to health coverage to Coloradans. It is designed for providers and other organizations that perform application assistance for health coverage or financial assistance, or otherwise provide support with health coverage enrollments.

As part of the Certified Application Counselor Program, Connect for Health Colorado will designate organizations that agree to certify staff or volunteers to perform the duties of Certified Application Counselors. These Designated Organizations must: 1) Submit a Designated Organization application for approval by Connect for Health Colorado, 2) Successfully complete mandatory training, and 3) Sign the Certified Application Counselor Program Designated Organization Agreement with Connect for Health Colorado.

Applications will be accepted and reviewed on September 30, 2013 and trainings scheduled to accommodate applications received during this period. Connect for Health Colorado will evaluate and consider the need for and interest in subsequent application periods. However, Designated Organizations that want to have Certified Application Counselors trained before October 1, 2013 must complete their application by Friday, September 6<sup>th</sup>, 2013. Connect for Health Colorado will continue to accept applications until September 30, 2013, however training will be scheduled after October 1, 2013.

**All applications shall be submitted using the fillable PDF form. The signed form and signed agreement shall be uploaded to: <http://C4HCO.Upload.connectforhealthco.com>.** The applicant will receive a confirmation email as soon as Connect for Health Colorado has verified the documents were received. Confirmation of receipt does not constitute approval of the application. Upon review, applicants will be notified in writing of their approval and provided instructions for registering for training.

### Questions and Webinar

Questions will be accepted to [grants@connectforhealthco.com](mailto:grants@connectforhealthco.com) until August 28, 2013 and responses will be posted by August 30, 2013.

A webinar to review the program and application will be held:

August 26<sup>th</sup>, 2013 from 2:00-3:00 PM

Dial In: 641-594-7000

PIN: 8559663

Webinar link: <http://www.videoserversite.com/go/C4HCO/CACwebinar082613>

*\*Please note that this is a live link and will not allow you to pre-register, but will be live on the day of the meeting.*

## Timeline

Application Announcement	August 19, 2013
Application Webinar and QA	August 26, 2013 2:00-3:00 PM
Questions Due	August 28, 2013
Responses Posted	Aug 30, 2013
Applications due for pre October 1 training	<b>September 6, 2013</b>
Applications Due	September 30, 2013

## 2.0 Background and Connect for Health Colorado Assistance Network Description

### 2.1 Connect for Health Colorado Background

Connect for Health Colorado is a public, non-profit entity established by Senate Bill 11-200, a state law passed by the Colorado General Assembly in May 2011. Connect for Health Colorado is governed by a Board of Directors with additional direction from a panel of state legislators called the Legislative Health Benefit Exchange Implementation Review Committee. Connect for Health Colorado's mission is to increase access, affordability, and choice for individuals and small employers purchasing health insurance in Colorado.

Connect for Health Colorado's new health insurance marketplace will open for business on October 1, 2013 and will allow individuals, families and small employers to shop for and buy health insurance based on quality and price. Customers using the Connect for Health Colorado website will be able to find information about health coverage options and the qualified health plans that will be sold, including information about tax credits and cost sharing subsidies that will help reduce the cost of purchasing a qualified health plan. Connect for Health Colorado will be the sole access point for eligible Coloradans to apply for and receive tax credits to reduce the cost of premiums and subsidies to reduce cost sharing. Customers will shop primarily through a website and will be able to access assistance by phone and in person through a customer support network that includes a call center, Health Coverage Guides and licensed brokers. Customers will be able to begin purchasing health plans through Connect for Health Colorado in October 2013 for enrollment effective beginning January 1, 2014. The development and planning activities of Connect for Health Colorado are funded by federal grants. Connect for Health Colorado must be self-financing in 2015. More information is available at [www.connectforhealthco.com](http://www.connectforhealthco.com).

### 2.1.1 Target Populations

Connect for Health Colorado will be open to the following Coloradans when the Marketplace launches in October:

- Individuals and families who currently purchase insurance on their own in the individual insurance market, including self-employed individuals;
- Uninsured individuals and families; and
- Small businesses (with 2-50 employees). Note: Certified Application Counselors are not expected to directly support small businesses. Certified Application Counselors will receive training to recognize small business marketplace questions and refer to the customer service center.

The following are some statistics that are helpful for understanding potential Connect for Health Colorado customers in the individual market:

- About 400,000 Coloradans currently purchase health insurance in the individual market.
- Of the Coloradans who purchase insurance in the individual market, more than 193,000 of them have incomes between 133-400 percent of poverty, making them eligible for premium tax credits in the Exchange.
- 779,000 Coloradans are currently uninsured (approximately one in six Coloradans).
- 434,000 households in Colorado have at least one uninsured member.
- 229,000 uninsured Coloradans have incomes between 133 and 400 percent of poverty, making them eligible for premium tax credits in the Exchange.
- 33 percent of uninsured Coloradans are Hispanic.
- 28 percent of Coloradans ages 19 to 34 (317,981 people) are uninsured, which is the highest rate of uninsured among all age groups.
- Young men ages 19 to 34 are the single largest group of uninsured (193,943).

State of Colorado maps showing the number and percent of uninsured can be found on the Connect for Health Colorado [website](#).

For additional information about the uninsured and underinsured in Colorado, including regional analysis, see CHAS Issue Brief: Overview of Coloradans' Health Care Coverage, Access and Utilization <http://www.cohealthaccesssurvey.org/reports/>

## 3.0 Connect for Health Colorado Certified Application Counselor Program

Connect for Health Colorado is establishing the Certified Application Counselor program to provide additional access points for Coloradans seeking assistance with the application for health coverage and financial assistance paying for coverage. The Certified Application Counselor program will be implemented in compliance with 45 CFR § 155.225. Certified Application Counselors provide assistance to individuals applying for health coverage and

financial assistance paying for health coverage, and provide information to customers about the process for shopping for, selecting and enrolling in QHPs, Medicaid and CHP+.

### **Connect for Health Colorado Support for Designated Organizations and Certified Application Counselors**

Connect for Health Colorado will be responsible for the following functions related to the Certified Application Counselor program.

- **Application Process:** Managing the Designated Organization application process.
- **Training:** Training will include modules on:
  - Connect for Health Colorado overview and introduction;
  - Eligibility;
  - Qualified health plan (QHP) options;
  - Insurance affordability programs;
  - Benefits;
  - Connect for Health Colorado privacy and security standards;
  - Other applicable rules and regulations including conflict of interest; and
  - How to make referrals to other members of the Customer Support Network.

Training will be held both on-line and in a large group setting. Designated Organization staff will be asked for a roster of staff to be trained who will be loaded into the Connect for Health online learning system for online courses. Additionally, Connect for Health Colorado will conduct periodic large group training at no-cost on a scheduled basis. Locations for training will be determined based on demand. Designated organizations may also contract with Connect for Health Colorado to provide in-person training directly to their staff. There will be a training fee associated with contracting with a Connect for Health Colorado trainer. In the future, Connect for Health Colorado may work with Designated Organizations to establish a Train the Trainer program or permit Designated Organizations to conduct their own Connect for Health Colorado approved training.

- **Ongoing Monitoring:** To include but not be limited to:
  - Review of annual submission of application from each Designated Organization;
  - Review of annual report to be provided by Designated Organizations;
  - Review of quality of information and interaction with consumers
  - Audit of Training quality and accuracy delivered via a Designated Organization's in-house Trainer
  - Audits and/or investigations in the event of complaints;
  - Review of Policies and Procedures if newly developed and/or if audits and or investigations require said review; and
  - Any activities as might be required due to breeches in security or instances of compromise of privacy.

- **De-Certification:** If necessary, Connect for Health Colorado will withdraw designation from a Designated Organization for non-compliance with the terms and conditions of the Designated Organization Agreement with Connect for Health Colorado.

To support Designated Organizations and Certified Application Counselors in helping Connect for Health Colorado customers learn about the range of options, complete applications, and facilitate enrollment, Connect for Health Colorado will provide the following services:

- **Website** capable of providing general education about health insurance terms, eligibility for premium tax credits and cost sharing subsidies, and comparison of available qualified health plans. The website will be a secure place for customers to apply for premium tax credits and cost sharing subsidies, and to access an eligibility determination for Medicaid and CHP+. The system will also collect and submit enrollment applications to QHPs.
- **Training Materials** and job aids online.
- **Customer Service Center** to provide support by phone to customers and Certified Application Counselors. The Customer Service Center will also support Spanish language interpretation services for customers and interpretation of other languages by request.
- **Outreach and Education Materials** available online for printing.
- **Tools and services** that support the blind and visually-impaired, non-English speaking customers, and TTY/TDD for the hearing impaired.

### **3.1 Designated Organization and Certified Application Counselor Expectations and Requirements**

#### **3.1.1 Requirements for Designated Organizations**

The Designated Organizations shall:

- Currently help with financial assistance, application assistance, or enrollment into financial or health programs
- Have existing policies and procedures in force that protect the privacy of personal information and personal health information;
- Have existing policies and procedure in place for staff and volunteer background checks;
- Have existing non-discrimination and inclusion policies;
- Have existing policies and procedures for providing ADA-accessible locations and services and for providing reasonable accommodations;
- Have existing policies and procedures for assessing and evaluating customer service programs for quality and escalating customer complaints for resolution.
- Have liability insurance including but not limited to at least \$1,000,000 per occurrence and \$2,000,000 aggregate General Liability, \$250,000 in Employee Crime/Dishonesty coverage and \$1 million in Privacy coverage.

- Agree to provide Connect for Health Colorado Application Counselor training for staff or volunteers who will act as Application Counselors.
- Agree to provide a plan to certify, monitor, evaluate, re-certify, and de-certify Application Counselors.
  - Certification plan must include passing Connect for Health Application Counselor training with 80% or better
  - Monitoring must include plan to regularly assess adherence to privacy practices, role, accuracy of guidance given to customers, and training standards
  - Duties and Standards of Certification must be in compliance with 45 CFR § 155.225 (c) and (d). A copy of 45 CFR § 155.225 is provided as Appendix A.
- Agree to provide application assistance without charging customers or making assistance conditional on any other relationship, purchase, or direct or indirect consideration.
- Agree to adhere to Connect for Health Colorado Privacy and Security Standards, and submit to audit of such.
- Agree to inform customers, prior to providing assistance, of the role of Certified Application Counselor.
- Agree to disclose to customers, prior to providing assistance, any conflicts of interest
- Agree to act in the best interests of customers.
- Agree to refer customers with unmet language interpretation or translation needs to the Connect for Health Colorado customer support network.
- Agree to provide Application Counseling services that acknowledge insurance affordability programs and qualified health plan options for which a customer is eligible.
- Agree to Connect for Health Colorado reporting and auditing requirements.
- Agree to adhere to Connect for Health Colorado's branding and marketing standards.

The Designated Organizations shall submit any of these policies and procedures to Connect for Health Colorado upon request.

Immediately upon application approval, Connect for Health Colorado expects Designated Organizations to identify staff and volunteers who will be trained and certified; review policies and procedures to ensure compliance with Connect for Health Colorado guidelines; and develop policies and procedures not in place but required to perform the duties described herein.

As part of the application, the Designated Organization applicant is responsible for submitting a Certification Plan that outlines how Certified Application Counselors will be certified,



monitored, evaluated and de-certified, if necessary. The Certification Plan must include the following components:

- The Certification Plan shall include a requirement that a Certified Application Counselor receives a score of 80 percent or higher on each training module to be certified.
- The Certification Plan shall outline its customer escalation and complaint resolution process.
- The Certification Plan shall articulate how the Certified Application Counselors will be monitored, evaluated and re-trained (if necessary) to ensure they are complying with all privacy practices, roles and training standards. This monitoring shall be designed to ensure Certified Application Counselors:
  - Do not charge for assistance;
  - Inform customers of their role and do so prior to providing assistance;
  - Obtain authorization from customers acknowledging the release of personal information for application purposes and obtain this authorization prior to providing assistance;
  - Disclose to customers, prior to providing assistance, any conflicts of interest;
  - Act in the best interests of customers; and
  - Do not provide advice and assistance on plan selection.
  - Do refer customers with unmet language interpretation or translation needs to Connect for Health Colorado customer service network.
  - Do provide Application Counseling services that acknowledge insurance affordability programs and qualified health plan options for which a customer is eligible.
- The plan shall detail the annual re-certification process, which shall include refresher training provided by Connect for Health Colorado.
- The plan shall detail the process for de-certifying Certified Application Counselors. At a minimum, the plan shall allow for de-certification for failure to complete training and for cause (e.g., due to complaints or multiple infractions of policies and protocols).

The Designated Organizations shall provide reports annually to Connect for Health Colorado. The specific reporting requirements and formats will be provided to the point of contact prior to the deadline but will include, at a minimum, the number of Certified Application Counselors, the number of customers assisted, a report of complaints received, and information about any de-certifications that had occurred over the prior year.

The initial open enrollment for coverage through Connect for Colorado begins on October 1, 2013 and will continue through March 31, 2014. Subsequent annual enrollment periods will be October 15<sup>th</sup> to December 7<sup>th</sup> each year. These will be the periods of highest activity, although Certified Application Counselors should also expect to provide enrollment assistance throughout the year as life-change events bring new people to the Marketplace.

### **Conflict of Interest**

Designated Organizations and Certified Application Counselors must disclose to Connect for Health Colorado and customers any relationships the Designated Organization or Certified

Application Counselor has with QHPs or insurance affordability programs, or other potential conflicts of interest. Designated Organizations must disclose these relationships to Connect for Health Colorado and shall require that any Certified Application Counselors disclose the same information to them.

### **Privacy and Security Requirements**

Connect for Health Colorado has developed Privacy and Security Standards in compliance with state and federal regulations to protect the data that Connect for Health Colorado receives, processes, stores, and handles on behalf of applicants, carriers, small-business owners, and others. Unauthorized disclosure of information can compromise Connect for Health Colorado business operations, violate individual privacy rights, and possibly constitute a criminal act. The Designated Organization shall agree to adhere to Connect for Health Colorado Privacy and Security Standards.

### **Liability**

Designated Organizations will be liable for the conduct of the Certified Application Counselors under their supervision, including (but not limited to) compliance with the roles and responsibilities set out in this Application and the Agreement. Designated Organizations will be required to hold Connect for Health Colorado harmless for any legal claims or damages resulting from Certified Application Counselors actions. Applicants will be required to show proof of insurance with signed agreement. Designated Organizations should consult an insurance professional for advice on appropriate liability insurance but at a minimum include \$25,000 in Employee Crime/Dishonesty coverage and \$1 million in Privacy insurance.

### **3.1.2 Certified Application Counselors: Roles, Responsibilities and Duties**

The Designated Organizations will be responsible for ensuring the duties performed by the Certified Application Counselors will align with federal requirements (45 CFR § 155.225 (c)) which require them to:

1. Provide information to individuals and employees about the full range of QHP options and insurance affordability programs for which they are eligible;
2. Assist individuals and employees to apply for coverage in a QHP through Colorado's Connect for Health Colorado and for insurance affordability programs; and
3. Help to facilitate enrollment of eligible individuals in QHPs and insurance affordability programs. Note: facilitating enrollment will include providing basic instruction to customers about the QHPs available in Connect for Health Colorado, the plan shopping experience and decision tools, providing information about next steps, and connecting the customer to a member of the Connect for Health Colorado customer service system (Service Center, Health Coverage Guides, Agents/Brokers) for plan selection assistance, if needed.

The role of the Certified Application Counselors will be to act in the best interest of the customer and provide Connect for Health Colorado customers with fair and impartial information and services that help educate them about:

- Connect for Health Colorado;
- The available programs, including insurance affordability programs such as Medicaid, CHP+, and subsidized coverage;
- Eligibility for QHP premium tax credits and cost-sharing reductions;
- How a customer can complete an application;
- The plan selection process and what they can expect; and
- Where to go for additional assistance with plan selection or unmet needs.

Certified Application Counselors can help individuals complete an application, describe the plan selection and enrollment process and clarify distinctions among QHPs; however, Certified Application Counselors ***should not provide advice or input on an individual's plan selection.***

## **4.0 Who may apply**

Individual organizations, associations, or government agencies may apply. Connect for Health Colorado encourages applications from organizations such as community health centers (including Federally Qualified Health Centers and Rural Health Centers); hospitals; health care providers (including Indian Health Services, Indian tribes and Urban Indian organizations that provide health care; Ryan White HIV/AIDS providers; behavioral health or mental health providers); agencies that have experience providing social services to the community such as Supplemental Nutrition Assistance Program (SNAP) outreach or energy assistance which are either non-federal government entities or organized under section 501(c) of the Internal Revenue Code; and other local governmental agencies that have similar processes and protections in places such as health departments and libraries.

## **5.0 Application Preparation and Approval Process**

### **5.1 Application Preparation**

Connect for Health Colorado requests qualified applicants submit completed and signed applications and agreements using the Connect for Health Colorado Designated Application Counselor Organization Application and Designated Application Counselor Organization Agreement that can be found on the Connect for Health Colorado website under the “Connect” menu. Applicants shall upload their application and agreement to <http://C4HCO.Upload.connectforhealthco.com>. A confirmation email will be sent to verify receipt as soon as Connect for Health Colorado has verified the documents were received. Connect for Health Colorado will communicate with the primary contact identified on the application.

**To have application counselors trained prior to October 1, 2013, applicant responses must be received no later than September 6, 2013.**

**Questions and Requests for Clarification:** A webinar will be held on August 26<sup>th</sup>. This webinar will be recorded and posted to the website if recording quality allows. Applicants may make e-mail inquiries to obtain clarification of requirements prior to August 28<sup>th</sup>, 2013. Email inquiries should be directed to: [grants@connectforhealthco.com](mailto:grants@connectforhealthco.com) with “Designated Organization Question” in the subject line. Phone inquiries will not be accepted. Inquiries received after August 28th may not be included in the responses posted on the Connect for Health Colorado website. Applicants and interested parties should check the website regularly for updates.

**Application Withdrawal:** Applications may be withdrawn by Applicants at any time.

**Connect for Health Colorado Questions, Requests for Clarification or Modifications:** During the application review, Connect for Health Colorado may contact Applicants for clarification of information provided on their application.

**Confidentiality:** Connect for Health Colorado will not make the contents of applications available to the public, however will comply with Colorado Open Requests Ask as necessary.

## **5.2 Approval Criteria**

The Designated Organizations shall be evaluated on the criteria as set forth in section 3.0 above.