

Connect for Health Colorado® Certified Application Counselor Program Announcement and 2016/2017 Application Guidelines

1.0 Purpose of Announcement

Connect for Health Colorado® has established 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 the 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) Sign and submit the Certified Application Counselor Program Designated Organization Agreement with Connect for Health Colorado, and 3) Successfully complete mandatory training.

Deadline: Applications will be accepted during timeframe to be designated by Connect for Health Colorado.

All applications shall be submitted using the form provided. The signed application and signed agreement shall be emailed together to: CACProgram@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 training registration.

Questions: Questions will be accepted via email to CACProgram@connectforhealthco.com. Please put CAC Program in the subject line of the email.

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 opened on October 1, 2013 and allows 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 can find information about health coverage options and the qualified health plans sold through the marketplace, and information about tax credits and cost sharing subsidies that will help reduce the cost of purchasing a qualified health plan. Connect for Health Colorado is 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 can apply and shop through Connect for Health Colorado's website and can also access assistance by phone and in person through the customer support network that includes a call center, Health Coverage Guides and licensed and certified agents/brokers. More information is available at www.connectforhealthco.com.

2.1.1 Target Populations

Connect for Health Colorado is open to:

- 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.

3.0 Connect for Health Colorado Certified Application Counselor Program

Connect for Health Colorado established 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 is being implemented in compliance with 45 CFR § 155.225 and all Designated Organizations are expected to maintain compliance with 45 CFR § 155.225 as well. Certified Application Counselors provide assistance to individuals applying for health coverage and financial assistance paying for health coverage, and provide information and assistance to customers regarding the process of 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 at least but not limited to:
 - o Connect for Health Colorado overview and introduction;
 - o Eligibility;
 - o Qualified Health Plan (QHP) options;
 - o Insurance affordability programs;
 - o Benefits;
 - o Connect for Health Colorado privacy and security standards;
 - o Other applicable rules and regulations including conflict of interest.

Training will be provided through the Learning Management System (LMS) and required at least annually. CAC Designated Organizations will be responsible for ensuring that their staff log in to the LMS and complete the required training.

- **Ongoing Monitoring:** To include but not be limited to:
 - o Review of annual submission of application and agreement from each CAC Designated Organization;
 - o Review of quality of information and interaction with consumers;
 - o Audit of CAC Designated Organization’s training quality and accuracy
 - o Review of policies and procedures upon submission of application or upon request by Connect for Health Colorado;
 - o 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 QHPs. 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

Connect for Health Colorado will designate organizations with staff or volunteers to perform the duties of Certified Application Counselors. CAC Designated Organizations and Certified Application Counselors must meet the Connect for Health Colorado certification standards described below:

- CACs employed with the CAC Designated Organization cannot receive any consideration directly or indirectly from health insurance issuers or issuers of stop loss
- Currently help with financial assistance, application assistance, or enrollment into financial or health programs
- Demonstrate policies and procedures protecting and maintaining the privacy of customer information
- Demonstrate policies and procedures for staff and volunteer background checks
- Have a non-discrimination and inclusion policy and agree to provide services to customers in an inclusive way that does not discriminate on the basis of factors such as race, color, religion, sex, national origin, or sexual orientation
- Locations for providing application assistance must be ADA accessible and must provide reasonable accommodation
- Have policies and procedures in place for assessing and evaluating customer service programs for quality and escalating customer complaints for resolution
- Signed Connect for Health Colorado Conflict of Interest Statement and any disclosures.

CAC CERTIFICATION REQUIREMENTS

For Connect for Health Colorado certification as a Certified Application Counselor, an individual must meet the following requirements:

- Completion of Connect for Health Colorado Certified Application Counselor training program
- Assignment by a Designated Organization. Assignment includes:
 - i. Documentation that individual is not on the OIG List of Excluded Individuals/Entities
 - ii. Attestation to adherence to Connect for Health Colorado Conflict of Interest and Conduct policy including acting in best interests of customer
 - iii. Documentation of signed Privacy and Security statement
 - iv. Documentation that background check was completed with satisfactory results
 - v. Documentation that Conflict of Interest disclosures has been signed and Connect for Health Colorado has been given any disclosures
 - vi. Agreement with the Designated Organization to perform duties of Certified Application Counselor and adherence to certification requirements

TERMS AND CONDITIONS OF CERTIFICATION APPLICATION COUNSELOR CERTIFICATION

Once a Certified Application Counselor is certified, certification shall remain in effect with the following conditions:

- Loss of assignment by Designated Organization will result in termination of certification
- Legal actions against a Certified Application Counselor that could result in inclusion on the OIG List of Excluded Individuals/Entities or would result in an unsatisfactory background check must be reported to Connect for Health Colorado and may result in termination of certification
- Changes in relationships that constitute a Conflict of Interest disclosure must be reported to Connect for Health Colorado and may result in termination of certification
- Breaches in security or instances of compromise of privacy must be reported to Connect for Health Colorado and may result in termination of certification
- Connect for Health Colorado reserves the right to inspect, assess, and audit a Certified Application Counselor's security and privacy practices. Inadequate security and privacy practices may result in termination of certification
- Certified Application Counselors must complete updated trainings to maintain expertise
- If quality audits show trends of concern about a Certified Application Counselor's ability to remain impartial or otherwise fulfill their duties, Connect for Health Colorado may ask for a plan of action for improvement or may terminate certification

Upon application approval, Connect for Health Colorado expects CAC 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 federal regulations.

Conflict of Interest

CAC Designated Organizations and Certified Application Counselors affirm that all of its CACs are not any of the prohibited entities and will not engage in any of the prohibited conduct specified in the Conflict of Interest and Conduct Policy referenced in Attachment 6 of the Agreement.

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 CAC Designated Organization shall agree to adhere to Connect for Health Colorado Privacy and Security Standards.

Liability

To the extent permitted by law, CAC Designated Organizations will be required to hold Connect for Health Colorado harmless for any legal claims or damages resulting from Certified Application Counselors actions.

3.1.2 Certified Application Counselors: Roles, Responsibilities and Duties

The CAC 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 plan selection assistance, if needed.

The role of the Certified Application Counselors will be to act in the best interest of customers by providing accurate information to help educate them about:

- Connect for Health Colorado;
- The available programs, including insurance affordability programs such as Medicaid, CHP+, and subsidized private health insurance 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.

Certified Application Counselors can help individuals complete an application, describe the plan selection and enrollment process and clarify distinctions among QHPs. Certified Application Counselors should not provide advice or input on an individual's plan selection, cannot act on behalf of the customer. CACs should provide fair, accurate and impartial information.

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

A completed application packet includes both the completed and signed application and agreement along with any and all applicable attachments and policies required. The Connect for Health Colorado CAC Program Designated Organization Application and Certified Application Counselor Program Agreement can be found on the Connect for Health Colorado website under the “About Us” menu by selecting “Application Counselors”. Applicants shall email their application, agreement and all attachments to CACProgram@connectforhealth.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.

Deadline for applications: Complete applications and signed Certified Application Counselor Program Designated Organization Agreements will be accepted at least annually as determined by Connect for Health Colorado.

Questions and Requests for Clarification: Applicants may submit questions and requests for clarifications to: CACProgram@connectforhealthco.com with “CAC Program” in the subject line. Phone inquiries will not be accepted. 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 the Colorado Open Records Act as necessary.

5.2 Approval Criteria

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