



**VERMONT
HEALTH
CONNECT**

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DATE: APRIL 10, 2013

STATE OF VERMONT

DEPARTMENT OF VERMONT HEALTH ACCESS

HEALTH BENEFIT EXCHANGE - VERMONT HEALTH CONNECT

NOTICE OF APPLICATION

TITLE: NAVIGATOR ORGANIZATION GRANTS

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Program Overview

Background

In March 2010, the Patient Protection and Affordable Care Act (ACA) was enacted by the United States Congress and signed into law by the President. The law requires each state have a Health Benefit Exchange (Exchange) in 2014. In May 2011, the Vermont legislature passed H.202, which became Act 48 when Governor Shumlin signed it into law. This legislation established the State's Health Benefit Exchange, now known as Vermont Health Connect.

Vermont Health Connect will be a new way for individuals, families and small businesses in Vermont to compare public and private health plans and select options that fit their needs and budgets. It is also the place where many Vermonters will access federal tax credits and cost-sharing subsidies to help pay for the cost of their coverage. With one-third of Vermont's population currently uninsured or underinsured, Vermont Health Connect aims to make high quality health coverage accessible to many more Vermonters.

Various terms are used within this application that may not be familiar to all readers. A glossary – accessible at http://healthconnect.vermont.gov/about_us/glossary – can assist in the reading and clarity of this application.

The Need for Navigators and Navigator Organizations

The mission of Vermont Health Connect is to provide all Vermonters with the knowledge and tools needed to compare and choose a quality, affordable and comprehensive health plan. Although many Vermonters will use the Vermont Health Connect website to independently find, compare, and self-enroll in Qualified Health Plans (QHPs) or public health programs, individuals will also have the option to access support on the phone through the call center, either facilitating their ability to self-enroll on the website or allowing them to complete the entire application process on the phone. Still, a large number of individuals will require in-person assistance to learn about Vermont Health Connect and apply for health coverage. Vermont Health Connect will provide this in-person assistance through its Navigator Program.

“Navigators” are Vermonters who will be trained and certified to provide free in-person health coverage enrollment assistance. They will also play a key role in Vermont Health Connect's outreach and education in communities across the state, working to make sure that both individuals and small businesses know what changes are coming and can access the tools and resources they need. In order to maximize Navigators' impact and ensure accountability, Navigators will be managed by entities selected by Vermont Health Connect to be “Navigator Organizations.”

Navigator Organization Duties and Criteria

Navigator Organizations will support operations, management, reporting and compensation of Navigators. Navigator Organizations will interact directly with Vermont Health Connect to streamline the data collection and reporting by Navigators. The functions of a Navigator Organization are to:

Navigator Organization Application

- Assign qualified personnel to be trained and certified as Navigators by Vermont Health Connect;
- Manage and oversee Navigators;
- Ensure that only certified Navigators are providing enrollment assistance;
- Leverage connections with key target populations to boost Vermont Health Connect's outreach efforts;
- Provide monthly status reports detailing engagement and enrollment efforts;
- Meet with Vermont Health Connect on a regular basis; and
- Manage State grant funding and compensation of Navigators, if applicable.

Entities interested in being certified as a Navigator Organization must:

1. Demonstrate existing relationships, or ability to readily establish relationships, with Exchange-eligible populations;
2. Demonstrate ability to manage Navigators;
3. Demonstrate ability to conduct outreach and education;
4. Demonstrate familiarity with the Vermont health care system;
5. Confirm there are no conflicts of interest;
6. Demonstrate ability to meet privacy and security standards;
7. Be a registered business in Vermont; and
8. Demonstrate good standing with Vermont Tax Department (certified after selection).

Navigator Duties and Criteria

Navigators will assist Vermonters—individuals and small businesses—in understanding their health care options, provide them with fair and impartial information regarding plans, and help them apply for plans that best fit their needs. This includes providing assistance in applying for health coverage in the range of private plans that will be offered on Vermont Health Connect, as well as public programs such as Medicaid and Dr. Dynasaur. As determined by state and federal law, the functions of a Navigator are to:

- Maintain expertise in eligibility, enrollment, and program specifications and conduct public education activities to raise awareness about the Exchange;
- Provide information and services in a fair, accurate and impartial manner; such information must acknowledge other health programs;
- Facilitate selection of a qualified health plan (QHP) and/or Medicaid, Dr. Dynasaur, VPharm and other public health benefit program;
- Provide referrals to any applicable office of health insurance consumer assistance or health insurance ombudsman established under section 2793 of the PHS Act, or any other appropriate State agency or agencies, for any enrollee with a grievance, complaint, or question regarding their health plan, coverage, or a determination under such plan or coverage; and
- Provide information in a manner that is culturally and linguistically appropriate to the needs of the population being served by the Exchange, including individuals with limited English proficiency, and ensure accessibility and usability of Navigator tools and

functions for individuals with disabilities in accordance with the Americans with Disabilities Act and section 504 of the Rehabilitation Act.

Individuals interested in being certified as Navigators must:

1. Be employed or sponsored by a Navigator Organization;
2. Be at least 18 years of age as of July 1 of the application year;
3. Disclose administrative and criminal history, if any;
4. Complete training program and pass exam; and
5. Confirm there are no conflicts of interest and disclose any current or former relationships in the last 5 years with any health insurance or stop loss insurer, or subsidiary, or any existing employment relationship between a health insurer and the individual's spouse or domestic partner.

Navigators will be certified for one contract year with the opportunity to be re-certified.

Navigator Certification Training Requirements

As the Navigator certification criteria dictates, applicants must complete the Navigator training program and pass an exam to demonstrate an understanding of the information taught in the training program. This is a two-step process:

1. Complete 24 hours of Navigator Training
2. Pass a written exam

The training program and exam will take place in the June/July timeframe and September 2013. Over time, new regulations and information pertaining to Vermont Health Connect may be released and it will be important for Navigators to be aware of those changes or updates. Pending how much new information is available, it is estimated that Navigators may be required to complete an additional 4-12 hours of training over the course of the year.

Evaluation of Navigator Organizations

Navigator Organizations will be responsible for monthly reporting to Vermont Health Connect. Reports will detail progress against engagement and enrollment goals set in the contract, assessment of Navigator and Navigator Organization activities, forecasting for upcoming months and recommendations for strategic adjustments if applicable. Vermont Health Connect will review reports on a monthly basis and evaluate Navigator Organizations on a quarterly basis.

Additionally, Navigator Organization representatives will be expected to attend quarterly Navigator Organization summits to share lessons learned, collaborate on strategies to address shared challenges, and provide feedback to Vermont Health Connect.

Application Overview and Schedule

Partnerships

Organizations can partner to submit one application – and are encouraged to do so if their capacity alone cannot meet Navigator Organization duties and requirements. However, all applications must be submitted by a prime applicant. The prime applicant will hold the contract with the State and be responsible for reporting and oversight of Navigators.

Grant Tiers

To accommodate the varied need for enrollment assistance across the state, Vermont Health Connect has developed a tiered Navigator Organization management structure to ensure that a sufficient number of Navigator Organizations are distributed throughout the state and among eligible populations. The structure features three tiers that are distinguished by the scope of work and the size of the funding grant.

Awards for Tier 1 Navigator Organizations will be allocated to applicants whose reach is specific to a geographic area or population, and whose grant request is up to \$40,000. Awards for Tier 2 Navigator Organizations will be allocated to applicants whose reach is specific to a geographic area or population, and whose grant request ranges from \$40,001 to \$100,000. Awards for Tier 3 Navigator Organizations – with grant requests up to \$200,000 – will be allocated to applicants whose reach is statewide and who have the organizational capacity to play a significant promotional and/or engagement role. Tier 3 Organizations will be expected to be major strategic partners with Vermont Health Connect, coordinating with other Navigator Organizations and state and local partners, adapting to a changing landscape, and filling strategic needs statewide. Note that Tier 3 Navigator Organizations' statewide reach may be specific to individuals and families or the small business community.

All tiers of Navigator Organizations will be expected to play active roles in such outreach activities as community forums, October kick-off events, promoting Vermont Health Connect through email lists and all other available communication tools, engagement of local organizations, and participation in other community events. The expectation for how organizations engage in each of these activities will vary by tier.

As a general standard for July-through-September activities, Tier 1 Navigator Organizations will engage a network of potential enrollees by:

- Maintaining a presence at five or more existing events or festivals;
- Meeting one-on-one with all relevant organizations that serve the designated population that will require enrollment support;
- Coordinating with overlapping Navigator organizations to avoid duplication of effort;
- Identifying locations and dates for Vermont Health Connect presentations to the communities they serve; and,
- Placing existing Vermont Health Connect materials in markets, community centers, faith institutions, and other physical and online venues that their target population frequents.

Tier 2 Navigator Organizations will generally be expected to do the above, at a larger scale, while also working on an ongoing basis to connect their target population to Vermont Health Connect’s participatory activities – both through social media and offline – and taking on an organizing role for October kick-off events.

Tier 3 Navigator Organizations will be expected to do all of the above, plus organize their own series of events in conjunction with other partners, ensure that the Vermont Health Connect story bank has a compelling collection of stories from all corners of the state, and work with Vermont Health Connect to develop specially-tailored new materials.

Applicants are required to apply for a specific tier that aligns with the grant range available and scope of their reach.

Table 1: Tiered Grant Levels

Grant Level	Grant Range¹	Reach	Estimated Grant Number
Tier 1	Up to \$40,000	Geographic area and/or audience-specific	6 – 9
Tier 2	\$40,001 to \$100,000	Geographic area and/or audience-specific	10 – 13
Tier 3	Up to \$200,000	Statewide effort and expected to coordinate with other partners	2

Applicants seeking to become Tier 1 and 2 Navigator Organizations will be required to identify the population(s) among which they intend to provide assistance – either by geographic area or specific to an audience in need of health coverage enrollment assistance. Applicants who intend to provide assistance to a specific geographic area are encouraged to identify that area as defined by Vermont’s Agency of Human Services’ (AHS) 12 regional districts:

Table 2: Anticipated Allocation of Navigator Organizations by Geographic Area

AHS District	Portion of Vermont Population	Estimated Number of Needed Navigator Organizations
Chittenden	24.0%	2-3
Rutland	10.3%	2
Windsor	9.7%	2
Washington	9.6%	2
Windham	7.6%	1

¹ Grant ranges detailed in Table 1 are estimates. Vermont Health Connect reserves the right to exceed the estimated number of grants should the grant amounts accommodate more grantees; or conversely exceed the grant range if the total number of grantees sufficiently address the needs of target populations.

Franklin & Grand Isle	8.4%	1
Bennington	6.1%	1
Addison	5.5%	1
Caledonia & Essex (South)	4.9%	1
Orleans & Essex (North)	4.2%	1
Orange	4.7%	1
Lamoille	4.0%	1

Alternately, applicants may intend to provide assistance to Exchange-eligible populations not tied to a geographic area. For example, an applicant might propose to focus on the a sub-set of the small business community or particular groups of individuals, such as refugees and new Americans, homeless populations, young adults, disabled Vermonters, or other audiences that may require targeted and/or tailored outreach and enrollment assistance. Whichever the demographic, the applicant should first make the case for why this group needs specialized assistance and then explain why their organization is best positioned to oversee this particular engagement effort.

Navigators can engage with, and facilitate enrollment for, applicants from populations beyond the scope of their contract; however, those engagements and enrollments will be considered secondary in the contract evaluation. This will ensure that Navigators focus on the needs of their specified population, and are evaluated primarily on their performance with this population.

Schedule of Events

The expected timetable, including the Application Deadline and other important dates, is set forth below.

Application Posted	April 10, 2013
Deadline for Questions	April 17, 2013 – 4:30 p.m.
Answers Posted	April 22, 2013
Application Deadline	April 29, 2013 – 4:30 p.m.
Selection Notifications	May 20, 2013
Commencement of Contract	July 1, 2013
Navigator Outreach and Education Training	June/July 2013
Begin Navigator Outreach and Education Work	July 2013
Navigator Systems Training	September 2013
Enrollment Assistance Begins	October 2013

End of Year 1 Contract	June 30, 2014
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Submission Contact Information and Deadline

All communications concerning this Application are to be addressed in writing to the attention of: Emily Trantum, Department of Vermont Health Access, 312 Hurricane Lane, Suite 201, Williston, VT 05495; Emily Trantum (Emily.Trantum@state.vt.us) will be the sole contact for this proposal.

Applications, whether emailed, mailed, or hand delivered, must arrive at DVHA no later than 4:30 PM, April 29, 2013. Late responses will not be accepted. DVHA does not take responsibility for any problems in mail or delivery, either within or outside DVHA. Receipt by any other office or mailroom is not equivalent to receipt by DVHA.

Selection, Notification, and Additional Requirements

A review team will evaluate the applications based on responsiveness to the application's key points and forward recommendations to Mark Larson, Commissioner, Department of Vermont Health Access, for final review and determination.

After the selection process, successful applicants will also be expected to complete a Vermont Tax and Insurance Certification form and confirm their ability to meet Vermont Health Connect's privacy and security standards and Navigator Conflict of Interest Framework. The privacy and security standards will be based on the "Nationwide Privacy and Security Framework for Electronic Exchange of Individually Identifiable Health Information" and its core principles of individual access, correction, openness and transparency, individual choice, collection, use, and disclosure limitation, data quality and integrity, safeguards, accountability (see <http://www.healthit.gov/sites/default/files/nationwide-ps-framework-5.pdf>). The Navigator Conflict of Interest Framework can be found in Appendix C.

Tier 1 and 2 Navigator Organizations will be funded through federal funds. Tier 3 Navigator organizations will be funded through state funds. All grant funding is subject to federal or state availability.

DVHA will notify all applicants in writing of selection of the apparently successful applicant(s). DVHA will notify all applicants when the contract(s) resulting from this application are signed by posting to the Electronic Bulletin Board (<http://www.vermontbidsystem.com>).

If the apparently successful applicant(s) refuses to sign the agreement within ten (10) business days of delivery, DVHA may cancel the selection and award to another applicant(s).

Funding will be available July 1, 2013 through June 30, 2014.

Contractor must specify the address to which payments will be sent and provide a current W-9 to DVHA upon request.

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DVHA will allow for up-front payment for estimated start-up costs. The grant will then move to quarter-end expenditure reporting and invoicing. If applicants have a suggested alternate payment structure, please propose with the application.

Application Format

Overview

Applications cannot exceed 10 single-sided pages on standard 8.5" x 11" paper (including the Cover Page and Budget Submission) for Tier 1 and Tier 2 Navigator Organizations and 12 pages for Tier 3 Navigator Organizations. If paper is used, documents must be single-spaced and use not less than a twelve point font. Alternatively, documents can be sent as an email attachment.

Application Checklist	
1. Applicant Information (See Appendix A for Cover Page Template)	
	<ul style="list-style-type: none"> • Provides organization information • Clearly identifies tier and budget • Provides contact information
2. Target Population(s) and Goals (no more than 1 page)	
	<ul style="list-style-type: none"> • Enrollment goal
3. Outreach and Education (no more than 2 pages)	
	<ul style="list-style-type: none"> • Details outreach goals • Identify strategies, partnerships, tactics, and tools that will be used to reach target audiences • If applicable, provides examples of outreach and education efforts to-date by applicant • If applicable, details ability to reach out in a manner that is linguistically and culturally appropriate
4. Relationships with Eligible Populations (no more than 2 pages)	
	<ul style="list-style-type: none"> • Details existing relationships, or ability to readily grow relationships, with eligible populations • If applicable, details history or current practice assisting in a manner that is linguistically and culturally appropriate
5. Management of Navigators (no more than 2 pages)	
	<ul style="list-style-type: none"> • Details current capacity and needed capacity • Details current and potential future hours of service • Details project management and reporting system • Details current and needed resources
6. Familiarity with the Health Care System (no more than 1 page)	
	<ul style="list-style-type: none"> • Demonstrates familiarity with the Vermont health care system • If applicable, highlight experience with enrollment or eligibility work
7. Budget (no more than 1 page)	
	<ul style="list-style-type: none"> • Navigator staffing • Non-Navigator Staffing

<ul style="list-style-type: none">• Out-of-pocket costs• Technology and Equipment• Travel• Administrative• Other• Total
8. Additional Information
<ul style="list-style-type: none">• If applicable, prior management of state funds• Other

Successful applicants will:

- Demonstrate ability to conduct outreach and education and all other activities described in the “Program Overview” and “Grant Tiers” sections (above);
- Demonstrate existing relationships, or ability to readily establish relationships, with eligible populations;
- Demonstrate ability to manage a Navigator or a team of Navigators; and
- Demonstrate familiarity with the Vermont health care system.

In the application (sections detailed below), organizations should address the above requirements. Please be mindful of the page limits indicated for each section.

1. Applicant Information

The applicant shall complete a Cover Page (Appendix A) detailing the applicant’s organization and contact information, information on partners (if applicable), total grant request, and estimate for the number of individuals in organization’s target population for anticipated engagement and enrollment (October 1, 2013 – June 30, 2014).

2. Target Population and Enrollment Goals (no more than 1 page)

Applicants applying for Tier 1 or 2 shall identify population(s) the applicant is capable of engaging with and enrolling – either by geographic area or audience. If by audience, the applicant shall identify and provide a detailed explanation as to why that population requires targeted engagement and enrollment efforts. Applicants applying for Tier 3 shall identify audience(s) the applicant is capable of engaging with and enrolling statewide. Tier 3 applicants should also identify organizations’ capacity for additional promotion, engagement, coordination, and strategic work, as described above.

Applicants shall also refer to the Enrollment and Outreach Goals stated on the Cover Page and provide a brief explanation of how the applicant arrived at this number, any data or resources used to calculate that total, and the rationale for what the applicant expects to be peak engagement and enrollment periods.

3. Outreach and Education (no more than 2 pages)

Outreach and education activities will be critical to the success of Vermont Health Connect and the enrollment of thousands of Vermonters. These activities will raise awareness of Vermont Health Connect and educate Vermonters about their health care options, financial assistance available to help pay for their coverage, and more. Navigators are required to conduct outreach and education activities, and Navigator Organizations will play a critical role in the planning and execution of those efforts.

Specific to the applicant's target population(s) in section 2, the applicant shall:

- Detail outreach and education goals, including a target number of Vermonters engaged through outreach activities, as well as strategies and sample tactics the applicant is capable of executing. Applicants should refer to the expected activities in the "Grant Tiers" section above. Applicants are also encouraged to think creatively about ways to raise awareness of Vermont Health Connect, tools that can be developed or used to connect with eligible populations and mediums through which Vermonters can be reached. If applicable to the population, please detail the applicant's ability to conduct outreach and education to non-English speakers and otherwise work in a linguistically and culturally appropriate manner.
- If applicable, provide examples of outreach and education efforts developed and executed by the applicant and the results of those efforts.

4. Relationship with Eligible Population(s) (no more than 2 pages)

A variety of Vermonters will be able to use Vermont Health Connect to explore health coverage options and apply for a health benefit plan. Vermonters eligible to use Vermont Health Connect include the uninsured, underinsured, current Medicaid and Dr. Dynasaur beneficiaries, current Catamount Health and Vermont Health Access Program beneficiaries, small business employers and employees, and individuals whose employer sponsored insurance is not affordable.

Specific to the applicant's target population(s) identified in section 2, the applicant shall:

- Detail existing relationships with eligible populations, if any. This may include relationships with organizations that represent or regularly communicate with eligible populations and/or direct relationships with eligible individuals, households or businesses. If the applicant has limited or no relationships with these populations, the applicant must demonstrate the ability to readily grow or establish relationships with eligible populations. If applicable to the population, please detail the applicant's relationships with non-English speakers.

5. Management of Navigators (no more than 2 pages)

Navigator Organizations are required to manage Navigators (and hire, if necessary). Navigator Organizations will be expected to manage oversight of outreach and application assistance activities, Navigator compensation, and regular reporting to Vermont Health Connect.

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Navigator Organizations will also be required to ensure that only individuals certified as Navigators are providing application assistance.

- The applicant shall identify current staffing capacity, as well as anticipated staffing need that aligns with the scope of services identified in this application by filling out the following form:

	Current Capacity Already on Staff	Additional Capacity to Meet Scope Identified in Application
Total # of Employees who may be certified as a Navigator		
Total Staff Hours/Week dedicated to serving as Navigators		

- The applicant shall identify current resource capacity to support operations (e.g. computers and technology, office supplies, physical office space, transportation), as well as anticipated resource needs that align with the scope of services identified in this application.
- The applicant shall describe:
 - Internal reporting mechanisms, including mechanisms for protecting privacy and security of personal information, and for managing potential conflicts of interest;
 - Relationship between field staff and headquarters;
 - Capacity for troubleshooting problems quickly; and,
 - Delineation of responsibilities and interaction between partners (if applying as a partnership).

See Appendix C for an example of a monthly reporting template.

6. Familiarity with the Health Care System (no more than 1 page)

Vermont Health Connect will play a vital role in the State's health care system. An understanding of the current health care system will be important to communicating to Vermonters about Vermont Health Connect.

- The applicant shall demonstrate familiarity with the Vermont Health Care system. This may include familiarity with healthcare policy, healthcare delivery, health coverage application assistance, state health programs or qualified health plans.
- If applicable, detail experience with enrollment and/or eligibility work (this does not have to be related to health care).

7. Budget (no more than 1 page)

In this section, describe proposed costs by submitting a completed budget. The budget must include personnel costs (Navigator and Non-Navigator staffing) as well as out-of-pocket costs necessary to meet the scope of services detailed above.

Proposals will be evaluated on total costs, administrative versus direct service costs, and the narrative describing applicant's experience fiscally managing contracts of comparable scale, scope and complexity. Expenses proposed need to be all-inclusive and follow the guidelines as laid out in State of Vermont Agency of Administration Bulletin No. 3.4.

- Navigator Staffing
- Non-Navigator Staffing (time allocated for supervision and administrative support)
- Technology and Equipment – such as computers, internet access, photo copier, scanner, phones
- Travel – such as mileage reimbursement
- Administrative – such as office supplies, phone lines
- Other – such as errors and omissions insurance, website development, translation services, computer training for staff

8. Additional Information

If applicable, identify contracts and/or grants from the last five years between the applicant and the State of Vermont, and demonstrate successful management of the contract and/or grant. The applicant is also welcome to submit additional information for consideration by Vermont Health Connect. Please be mindful of the overall application page limit.

Appendices

Appendix A – Application Cover Page

Organization Name

Organization Address

Tax Identification Number

**Mission Statement
(if none exists, describe the
primary focus of your work)**

Grant requested

**Enrollment and Outreach
Goals
(to be supported in
narrative)**

	Projected: Total	Projected: 10/31/13	Projected: 12/31/13	Projected: 3/31/14	Projected: 6/30/14
Completed Enrollments – Target Population					
Outreach Interactions – Individuals Reached					

Contact Name

Contact Phone Number

Contact Email Address

If the applicant is submitting a proposal as the prime among multiple organizations, please identify all information requested above for sub-contractors by filling out this form and including in the application packet as an addendum.

Appendix B – Sample Monthly Reporting Template

(Not to be filled out as part of application)

Navigator Organization: _____

Date: _____

Enrollment and Outreach Goals and Performance:

	Projected: Total	Actuals: Total	Projected: October 31	Actuals: October 31	Projected: December 31	Actuals: December 31	Projected: March 31	Actuals: March 31	Projected: June 30	Actuals: June 30
Completed Enrollments – Target Population										
Completed Enrollments – Other Population										
Enrollment Interaction – Started – Target Population										
Enrollment Interaction – Started – Other Population										
Outreach Interaction										

Enrollment Log			
(all completed enrollments)			
Date Enrolled	Initial Status (Uninsured, Medicaid, VHAP, Catamount, Private, Employer, Other)	Final Status (Medicaid, QHP w/tax credits, QHP no tax credits)	# of Lives Covered by Enrollment

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Please provide an assessment of your organization’s progress against enrollment goals.

Please provide an assessment of most/least successful engagement medium (in-person/online/phone).

Please provide an assessment of the type of engagement(s) Navigators are assisting in. Please identify where in the application process applicants are reaching out to Navigators, where they find themselves no longer in need of assistance, and where they are being referred to another entity.

Please provide an assessment of average engagement length per applicant, including the number of engagements required to provide adequate assistance. If engagements are taking longer than expected, please explain why.

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Please provide an assessment of most/least successful outreach and education activities from this reporting period.

Please detail upcoming engagement activities and where possible, forecast engagement and enrollment metrics. Please identify or recommend strategic adjustments if applicable, for next month.

Appendix C – Navigator Conflict of Interest Framework (subject to change)

It is Vermont Health Connect’s intent that the Navigator Program provides Exchange customers with high quality, community-based education, in-person information and guidance that is unbiased and impartial. In order to assure the delivery of high quality Navigator services, and to minimize or eliminate the existence of conflicts of interest or the appearance of impropriety, Vermont Health Connect will:

1. Monitor for potential conflicts of interest during the Navigator Organization selection process and throughout the term of engagement with the Navigator Organization.
2. Provide robust initial and ongoing training that includes instruction on providing impartial education and in-person assistance with customer selection of a qualified health plan.
3. Require from Navigator Organization and Navigators disclosures of affiliations that may present a direct or indirect conflict of interest.
4. Monitor Navigator enrollment practices through use of reporting in Vermont Health Connect’s system.
5. Actively solicit customer satisfaction feedback on their Navigator experience.
6. As circumstances command where a conflict of interest arises, require mitigation, revocation of certification, or termination of the grant.

1. Prohibition on Navigator conduct

1.1. As required by 45 CFR 155.210 (d) a Navigator or Navigator entity must not:

- 1.1.1. Be a health insurance issuer
- 1.1.2. Be a subsidiary of a health insurance issuer
- 1.1.3. Be an association that includes members of, or lobbies on behalf of, the insurance industry; or
- 1.1.4. Receive any consideration directly or indirectly from any health insurance or stop loss insurance issuer in connection with the enrollment of any individuals or employees in a QHP [qualified health plan] or non-QHP [qualified health plan].²

1.2. A Navigator or Navigator entity must not:

- 1.2.1. Be a provider entity (including, but not limited to, hospitals, clinics, and physician practices) that is directly owned by, a subsidiary of, or exclusively contracts with, a single insurer or its subsidiaries., except in cases where the provider can demonstrate that due to geography or other factors, there are significant limitations on available insurers with whom to contract.

2. Navigator conflict of interest

- 2.1. A Navigator shall not allow any philosophical, professional or personal financial or non-financial interests to influence or appear to influence the ability of the Navigator to perform his/her duties impartially.
- 2.2. Navigators shall attest that they are not a prohibited entity or employed by a prohibited entity as described in Paragraph 1.
- 2.3. Navigators shall not receive consideration directly or indirectly from any health insurance issuer in connection with enrollment of individuals or employees.
- 2.4. Navigators shall disclose personal and professional financial and non-financial interests to Vermont Health Connect and to customers prior to assistance, including any current or former relationships in the last 5 years with any health insurance or stop loss insurer, or subsidiary, or

² Vermont Health Connect interprets the word “indirect” consideration to mean in-kind compensation. Vermont Health Connect further interprets this provision to say that Navigators cannot receive compensation (cash or in-kind) for enrollment.

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any existing employment relationship between a health insurer and the individual's spouse or domestic partner.

- 2.5. Navigators shall provide to customers impartial information about all plans for which customers are eligible and shall not allow personal or professional interests to influence the customers' decisions. In an effort to maintain impartiality in providing assistance:
 - 2.5.1. Navigators must not in any way solicit or persuade customers to enroll in any specific health insurance plan.
 - 2.5.2. Navigators must not in any way solicit or persuade customers to switch from one carrier to another.
 - 2.5.3. Navigators must not in any way persuade or compel customers to select a particular provider.
 - 2.5.4. Navigators must not in any way solicit or persuade customers to engage a particular agent or broker.
- 2.6. Navigators shall not charge for Navigator services.
- 2.7. Navigators shall not use their role as a Navigator for lead generation or profit.
- 2.8. Navigators shall adhere to Vermont Health Connect monitoring and evaluation requirements.

3. Navigator Organization conflict of interest

- 3.1. A Navigator Organization shall not allow any philosophical, financial or non-financial interests or affiliations to influence or appear to influence the ability of the Navigator Organization to impartially deliver Navigator services or assure that the Navigators employed, contracted or otherwise supervised by the Navigator Organization are able to impartially perform their duties as Navigators.
- 3.2. Navigator Organizations shall disclose all philosophical, financial and non-financial interests or affiliations that may present a conflict of interest to Vermont Health Connect and to customers.
- 3.3. Navigator Organizations shall not be any of the prohibited entities described in Paragraph 1.
 - 3.3.1. Navigator Organizations shall disclose all relationships with prohibited entities as described in paragraph 1.
 - 3.3.2. Navigator Organizations receiving any cash or in-kind compensation from health insurance issuers shall disclose the nature of the compensation, what the compensation is intended to support, and from whom it is received.
- 3.4. Navigator Organizations shall not direct or permit Navigators to solicit or persuade customers to enroll in any specific health insurance plan, switch from one carrier to another, or select a particular provider.
- 3.5. Navigator Organizations shall not charge for Navigator services or otherwise utilize the Navigator Program, or their association with the Navigator Program for lead generation or profit.
- 3.6. Navigator Organizations shall not utilize interests or affiliations for purposes of soliciting or persuading customers to enroll in a specific health insurance plan, switch from one plan to another, or to select a particular provider.
- 3.7. Navigator Organizations shall monitor Navigators it employs, contracts with or otherwise supervises for fair and impartial performance of Navigator duties.
- 3.8. Navigator Organizations shall adhere to Vermont Health Connect monitoring and reporting requirements.