

Information for Tribes about Navigator Funding

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Summary

On April 9, 2013, Centers for Medicare and Medicaid Services (CMS) posted information about Cooperative Agreements to support Navigators in the Federally-facilitated and State Partnership Exchanges. You can find detailed information by going to http://www.grants.gov/applicants/find_grant_opportunities.jsp and searching for CFDA: 93.750. The due date for an optional letter of intent to apply was May 1, 2013. The deadline for proposals is June 7, 2013, at 1:00 pm Eastern time. It is estimated that 100 agreements will be awarded on August 15, 2013.

Funding and Award Process

A total of \$54 million is available for Navigator funding. It has been apportioned by state on the basis of the number of uninsured people in each state with an FFE, with a minimum of \$600,000 per state. The following amounts have been designated for states with federally-recognized tribes:

Alabama	\$1,071,682
Alaska	\$600,000
Arizona	\$1,580,466
Florida	\$5,851,072
Indiana	\$1,516,694
Kansas	\$600,000
Louisiana	\$1,325,233
Maine	\$600,000
Michigan	\$1,909,960
Mississippi	\$853,293
Montana	\$600,000
Nebraska	\$600,000
North Carolina	\$2,245,281
North Dakota	\$600,000
Oklahoma	\$1,078,001
South Dakota	\$600,000
Texas	\$8,151,185
Utah	\$600,000
Wisconsin	\$829,329
Wyoming	\$600,000

There is a two tier processes for awards. The first round uses criteria set forth in the application materials. If there is any money remaining, it will be combined from all states and awarded to applicants in the second round regardless of the initial state allocation. In other words, states could exceed their initial allocation by receiving awards in the second round. All awards will be announced at one time whether selected during the first or second tier review.

Conflict of Interest

Tribes and Tribal Organizations are allowed to apply for Navigator funding. It is not considered a conflict of interest to receive money from insurers for health services provided to enrollees. The only conflict of interest identified is that during their term as Navigators, individuals and entities are not permitted to receive any direct or indirect consideration from a health insurance issuer that is connected to the enrollment of individuals into QHPs or non-QHPs.

Rules Regarding Discrimination and Serving Non-Natives

The CMS Navigator Funding Opportunity (FOA) states:

. . .awardees will be required to assist any consumer seeking assistance, even if that consumer is not a member of the community(ies) or group the applicant expects to serve, as outlined in their funded proposal. There may be some instances where a Navigator does not have the immediate capacity to help an individual. In such cases, the Navigator should make every effort to provide assistance in a timely manner, but could also refer consumers seeking assistance to other Exchange resources, such as the toll-free Exchange Call Center, or to another Navigator in the same Exchange who might have better capacity to serve that individual more effectively. Additionally, if a Navigator is approached by a consumer who lives in a State with an State-based Exchange, or in a State in which the Navigator does not serve, the Navigator must refer the consumer to a Navigator in the consumer's State.

Proposal Budgets

Cost sharing or matching is not required as a condition of award. If requesting indirect costs, a currently effective Indirect Cost Rate Agreement will be required. Applicants are required to use the rate agreed to in the Indirect Cost Rate Agreement. Other allowable items in the budget include: personnel and fringe benefits; contractual costs, including subcontracts; equipment (including personal computers, scanners for consumers to use in uploading consumer supporting documentation to accompany applications, wireless cards if necessary, and any materials necessary for staff to ensure no consumer Personally Identifiable Information (PII) is compromised while performing Navigator

duties); supplies; and travel (including costs associated with performing outreach and education and traveling to assist consumers in more remote regions of the State.

Each applicant is eligible for only one, non-renewable, one-year cooperative agreement award. An applicant may propose to serve populations in more than one FFE state by submitting separate Budget Narratives requesting funding for each state in a single application.

Proposal Requirements

The application cannot exceed 21 pages, including a Project Narrative not to exceed 15 pages, and a Work Plan and Timeline not exceed 3 pages in length. The Project Narrative includes Scope of Activities, Accomplishments, and Expertise of Personnel.

Reporting

The reporting requirements include quarterly reports and a final report that are submitted electronically. While the format of the reporting has not yet been determined, the FOA lists the following content for reports:

These reports will outline how cooperative agreement funds were used, describe program progress, describe any barriers encountered including how any potential conflicts of interest were mitigated and process for handling non-compliant staff or volunteers, describe how the program ensured access to culturally and linguistically appropriate services, and detail measurable outcomes to include how many staff and volunteers completed required training and became certified as Navigators and how many consumers were served.

Navigator Training

The FOA states:

Personnel in Navigator entities awarded cooperative agreements through this funding opportunity must complete up to 30 hours of an HHS-developed training program and pass an exam to ensure appropriate understanding of relevant Exchange-related information. Navigators will receive resources from HHS to complement the training program including a manual of standard operating procedures.

Competitiveness of Tribes and Tribal Organizations

The FOA encourages Tribes to submit combined applications:

Small entities and individuals proposing to serve smaller, hard-to-reach, or underserved populations are encouraged to apply, particularly by partnering with other entities and/or individuals to form a consortium which serves a larger total portion of the population. In the case of an application from more than one entity or individual (i.e., a consortium), applicants must designate a lead applicant to serve as the primary contact.

Tribes and Tribal Organizations should be competitive for funding to enroll members of tribal communities. For example, the proposal narrative on Accomplishments has the following guidelines that make it unlikely that any other applicant will be more qualified:

iii) Accomplishments

Applicants must include information regarding the individual, entity, or consortium's track record and accomplishments involving the activities outlined below. If the applicant is a consortium, information for each member should be included.

- Developing and maintaining relationships with key stakeholders including employers and employees, consumers (including uninsured and underinsured consumers), and self-employed individuals likely to be eligible for enrollment in a QHP;
- Assisting consumers, including those from vulnerable populations, with the process of obtaining health care eligibility determinations and obtaining health coverage;
- Conducting public education and outreach activities;
- Providing information and services to individuals with varying levels of education and financial and health literacy in a manner that is culturally and linguistically appropriate; and
- Working with individuals with limited English proficiency, individuals with disabilities, populations underserved in the current private health insurance market, and vulnerable populations.

Similarly, the section on Expertise of Personnel states requires applicants to demonstrate ability to perform work that is culturally and linguistically appropriate.

Summary

Tribes and Tribal Organizations are trying to figure out whether it is worth it to submit an application for Navigator funding. On the one hand, Tribes and Tribal Organizations are likely to receive cooperative agreements because they are in the best position to enroll a hard-to-reach population. On the other hand, the amount of funding available may be insufficient to fund the activities required, including serving non-Natives and complying with the reporting requirements. If Tribes and/or Tribal Organizations partner with non-Tribal groups that are applying for funding, they may have different expectations. For example, the non-Native Navigator program may be geared toward the open enrollment period from October through December of 2013, while Tribe may prefer to take a slower approach which is possible due to the monthly open enrollment periods for AI/A.

It will be difficult for most Tribes and Tribal Organizations in FFE states to enroll AI/AN because the federal government has not done a good job of addressing all of the obstacles to enrollment, such as definition of Indian, electronic verification, Tribal Sponsorship, and the I/T/U as providers in networks. It may take longer to enroll each individual due to low health insurance literacy, little motivation to enroll, and the complexity of mixed families. It may be more expensive to enroll AI/AN not only due to the longer time needed per person, but also time and costs associated with travel and training.

Tribes and Tribal Organizations may want to consider the following strategies:

- 1) Apply for the Cooperative Agreement Funding recognizing that it will be insufficient, and combine it with other funding such as Medicaid Administrative Match, Indian Health Service funding, self-generated funding, and/or tribal funds.
- 2) Do not apply for the Cooperative Agreement Funding as the cost of coordination, preparing the application, and reporting exceed the amount that the Tribe or Tribal Organization is likely to receive.
- 3) Monitor the performance of others who receive Navigator funding and appeal to CMS for a different type of funding for enrollment activities in the future.
- 4) Consider a Tribal ordinance licensing Navigators to operate on Tribal lands to prevent outsiders from providing misinformation to Tribal members. The license could require other groups that receive Navigator funding to subcontract with the Tribe for certain aspects of the work.