Training and Related Requirements for Health Centers in FFMs or SPMs

1. What are HRSA’s minimum training requirements for health centers in FFMs and SPMs?

Health centers in FFMs must, at a minimum, apply for and be designated as a CAC organization and ensure that all health center O/E assistance workers successfully complete the federal CAC training.

In SPMs, health center O/E assistance workers may be required to complete a state-specific training program in lieu of and/or in addition to the federal CAC training in order to facilitate enrollment.

Health centers in FFMs or SPMs that have the option of participating in training beyond that which is required for CACs can pursue this training and perform any additional functions afforded by that higher level of training, as long as they remain consistent with the intent of the HRSA O/E supplemental funding opportunity i.e., to hire O/E assistance workers and facilitate enrollment of individuals into the Marketplace, Medicaid and/or CHIP.

If you are unsure about additional state requirements, contact your state’s primary care association. Contact information for the PCA in your state can be located at http://bphc.hrsa.gov/technicalassistance/partnerlinks/associations.html.

2. Does my health center organization need to apply to become a CAC organization before my O/E assistance workers can be trained?

Yes. If your health center is in a FFM or SPM state and you haven’t already done so, you should complete an application to become a CAC organization. The CAC application is located here: http://marketplace.cms.gov/help-us/cac-apply.html. FAQs related to this application process are here: http://marketplace.cms.gov/help-us/common-qandas-about-cac-designation.pdf.

3. Must health center O/E assistance workers who are not newly hired with O/E supplemental funds complete CAC training?

Yes. Regardless of whether a health center O/E assistance worker is directly supported by O/E supplemental funds, FFM and SPM health center staff, volunteers, or contracted individuals performing outreach and enrollment activities must, at a minimum, be trained as a CAC.

Likewise, if your organization did not receive O/E assistance funding (e.g., you are a look-alike or did not apply for O/E supplemental funds) and you want to provide enrollment assistance, all health center O/E assistance workers must, at a minimum, be trained as a CAC. If you are unsure about if or what
additional training is required in your state, contact your primary care association. Contact information for the PCA in your state can be located at http://bphc.hrsa.gov/technicalassistance/partnerlinks/associations.html.

4. **Must health center O/E assistance workers not included as “new FTEs” hired with the support of O/E supplemental funds complete CAC training?**

Yes. All health center O/E assistance workers, including those not directly supported by O/E supplemental funds must meet the minimum training requirements (see Q1).

Likewise, if your organization did not receive O/E assistance funding (e.g., you are a look-alike or did not apply for O/E supplemental funds) and you want to provide enrollment assistance, all health center O/E assistance workers must meet the minimum training requirements (see Q1).

5. **Federal CACs are not required to do outreach. Do my O/E assistance workers have to do outreach?**

Health center O/E assistance workers in organizations with O/E supplemental funding must comply with federal and/or state CAC requirements and HRSA requirements. Health center O/E assistance workers in health centers supported by O/E supplemental funding are required to do both in reach with current patients and outreach in their approved service area.

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**Federal CAC Organization Certification Application—For Health Centers in FFMs and some SPMs**

6. **What should I put under “Organization Type” on the CAC application?**

Under “Organization Type” write in “HRSA Health Center” to help ensure that your application gets an expedited review. If you have already submitted your application and did not indicate that you were a HRSA health center you do not need to resubmit an application. HRSA will work with CMS to ensure that health centers are recognized among the applications submitted.

7. **In my health center’s CAC application I didn’t specify that my organization is a “HRSA health center.” Do I need to revise or resubmit my application?**

No. Not specifying that you are a health center will not prevent or significantly delay the processing of your application. HRSA is working with CMS to ensure that all HRSA health center CAC application reviews are completed as quickly as possible.

8. **What does Personally Identifiable Information (PII) refer to, and what should I check in my health center’s CAC application?**

Personally identifiable information or “PII” refers to information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. By virtue of the nature of health center work with patient records, you should be able to check “yes” in response to this question.
9. I checked “no” under the PII question in the CAC application. Will my application be rejected?

No. CMS will follow up with organizations whose applications require further clarification.

10. Should I include all health center sites on my CAC application?

The sites you provide in the application will be made available to the public as locations where enrollment assistance will be available, so only include sites at which trained health center CACs will be present.

11. Why does the CAC application ask for a website link? What if I don’t have a website?

The contact information you provide on your CAC application will be made available to the public, so be sure that your website includes information about when and where outreach and enrollment activities and application assistance will be taking place. If you don’t have a website, you can write in N/A.

12. What do I do if I need to revise something in my health center’s CAC application?

HRSA is working with CMS to identify how health centers and other organizations can revise information as needed to accurately represent your organization. We will provide information on that process as soon as we have it.

13. State law requires that organizations doing enrollment assistance be licensed and perform background checks for all CACs. Does HRSA require that we meet do background checks?

HRSA requires that health centers comply with all applicable training and related requirements in their state.

14. FFM CACs are not required to do outreach. Do my O/E assistance workers have to do outreach?

Health center O/E assistance workers in organizations with O/E supplemental funding must comply with CAC requirements and HRSA requirements. Health center O/E assistance workers are required to do both in-reach with current patients and outreach in their approved service area.

Managing Different Enrollment Assistance Funding

15. What are HRSA expectations for how health centers manage any additional funds they have already received or might receive to support Navigators or other types of enrollment assisters?

Health centers must be accountable for the HRSA O/E supplemental dollars and use them consistent with allowable costs and the intent of the funding, i.e., to hire O/E assistance workers and facilitate enrollment of individuals into the Marketplace, Medicaid and/or CHIP. HRSA O/E supplemental dollars must not supplant other federal or state Navigator or related funding or vice versa. Any additional funding for enrollment assistance must be additive.
For example, if your organization proposed to hire 3.0 new FTEs in your O/E supplemental application and 3.0 new FTEs will be supported by federal Navigator dollars, you must hire a total of 6.0 FTEs; 3.0 new FTEs who must meet HRSA’s CAC or equivalent minimum training threshold, and all other HRSA O/E supplement requirements and 3.0 new FTEs who must meet all Navigator training and related requirements.

16. If my health center received BPHC O/E supplemental funding and will also be supported by federal Navigator funding, what training should my O/E assistance workers supported by HRSA complete?

O/E assistance workers must complete the minimum training (see Q1). Health centers that have the option for O/E assistance workers to participate in Navigator or other more extensive training may choose to take advantage of those opportunities and perform any additional functions afforded by that higher level of training, as long as they remain consistent with the intent of the HRSA O/E supplemental funding opportunity i.e., to hire O/E assistance workers and facilitate enrollment of individuals into the Marketplace, Medicaid and/or CHIP and allowable costs.

Likewise, if the state has any additional training or other requirements, then health centers and O/E assistance workers must comply with those requirements.

Additional Questions

17. Where do I go with additional questions?

FFM/SPM CAC application questions:
- CMS has an email inbox dedicated to handling questions and problems related to the CAC application. That inbox is: cacquestions@cms.hhs.gov.

O/E supplemental funding requirements:
- BPHC’s O/E team is available to answer questions at: bphc-oe@hrsa.gov.

State-specific training requirements:
- Contact your primary care association. A list of state primary care associations are located at: [http://bphc.hrsa.gov/technicalassistance/partnerlinks/associations.html](http://bphc.hrsa.gov/technicalassistance/partnerlinks/associations.html).

Other important websites:
[https://www.healthcare.gov/](https://www.healthcare.gov/)