

Health Center Outreach and Enrollment (O/E) Training FAQs

State-Based Marketplaces (SBMs)

Training and Related Requirements for Health Centers in State-Based Marketplaces

1. What are HRSA's minimum training requirements for health center O/E assistance workers in SBMs? Can we train O/E assistance workers above that minimum?

At a minimum, health centers and health center O/E assistance workers in SBMs must complete all individual training and any other individual and organizational requirements for individuals who will facilitate enrollment of individuals into affordable insurance options offered through the Marketplace, Medicaid and CHIP in that state.

Health center O/E assistance workers who have the option to participate in more comprehensive training than the minimum required for individuals to facilitate enrollment into affordable insurance options offered through the Marketplace, Medicaid and CHIP may participate in additional 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 and allowable costs.

If you are unsure the requirements in your state, contact your primary care association (PCA) for more information. Contact information for the PCA in your state can be located at <http://bphc.hrsa.gov/technicalassistance/partnerlinks/associations.html>.

2. How do my SBM training requirements differ from the federal CAC training requirements?

It depends on your state. Some SBMs may use the federal CAC training as their state training program, but many states will establish or already have established their own training program and associated organization and individual requirements.

3. If my SBM allows O/E assistance workers that are under the scope of our HRSA O/E activities the option of completing Navigator or In Person Assister (IPA) training, can we train our health center O/E workers as Navigators or IPAs?

If Navigator, IPA or other training beyond the minimum required for individuals who will facilitate enrollment of individuals into affordable insurance options offered through the Marketplace, Medicaid and CHIP in that state, health center O/E assistance workers can participate in that additional training and perform any additional functions afforded by that 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.

- 4. My health center is in a SBM. Do our O/E assistance workers need to complete the federal application to become a CAC organization? Do our O/E assistance workers have to complete the federal CAC training?**

If you are in a SBM, you do not need to complete the federal CAC application and CAC training unless the SBM has chosen to use it as their training program for individuals who will facilitate enrollment of individuals into affordable insurance options offered through the Marketplace, Medicaid and CHIP in that state. Many SBMs will establish or already have established their own training program and associated requirements.

- 5. Must health center O/E assistance workers who are not newly hired with O/E supplement funds complete state training requirements?**

Yes. Regardless of whether a health center O/E assistance worker is directly supported by O/E supplemental funds, health center staff, volunteers, or contracted individuals performing outreach and enrollment activities must, at a minimum, complete all training requirements for individuals who will facilitate enrollment of individuals into affordable insurance options offered through the Marketplace, Medicaid and CHIP in that state.

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 same minimum training requirements as health center O/E assistance workers in health centers that received O/E supplemental funds.

- 6. State law requires that organizations that facilitate enrollment through the SBM be licensed and perform background checks on all individuals providing enrollment assistance. Does HRSA require that our organization be licensed and/or complete background checks on employees?**

HRSA requires that health centers and their O/E assistance workers comply with all applicable state laws and requirements that apply to their O/E assistance role in their state.

- 7. Enrollment assisters in my state 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 state requirements and HRSA O/E supplemental funding 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

- 8. 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.

If needed, HRSA and CMS will provide additional guidance to health centers and/or PCAs that received both HRSA O/E supplemental funding and Navigator funding.

9. If my health center received HRSA O/E supplemental funding and Navigator or IPA funding from the state, what training should my O/E assistance workers complete?

If Navigator, IPA or other training beyond the minimum required for individuals who will facilitate enrollment of individuals into affordable insurance options offered through the Marketplace, Medicaid and CHIP in that state, health center O/E assistance workers can participate in that additional training and perform any additional functions afforded by that 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.

Additional Questions

10. Where do I go with additional questions?

FFM/SPM CAC application questions: FAQs related to this application process are here: <http://marketplace.cms.gov/help-us/common-questions-about-cac-designation.pdf>. 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.

BPHC O/E supplemental funding technical assistance: <http://bphc.hrsa.gov/outreachandenrollment/>

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>. Primary care associations will work closely with your state marketplace to identify health center training requirements and troubleshoot problems as they arise.