

**United Way
of Tarrant County**

1500 N. Main St., Ste. 200
P.O. Box 4448
Fort Worth, TX 76164-0448
Tel 817-258-8000
Fax 817-258-8005
www.unitedwaytarrant.org

The United Way of Tarrant County as the lead agency of the Consumer Health Insurance Marketplace Enrollment Services (CHIMES) Consortium would like to comment on the work our Consortium is doing in Texas. As you may know, Navigator grantees have to follow standards set by the Department of Health and Human Services for all Navigators. Such requirements include, but are not limited to, extensive online training on Marketplace enrollment application, standards for community outreach, customer service and privacy and security standards. In addition to these requirements, all members of the CHIMES Consortium will conduct a level 1 criminal background check on all Navigators and require them to complete additional one and a half hour online HIPPA overview training and receive certification. Currently we have 145 certified Navigators that have completed all these requirements.

Moreover, a Navigator Standard Operating Procedures Manual, developed by CMS, is available for all Navigators with extensive information reiterating all training standards and additional needed information including how to collect, store, transfer and secure Personally Identifiable Information (PII), and how to file a security breach.

The Marketplace has specific Privacy and Security Standards to guide Navigator organizations in protecting consumers' privacy. United Way of Tarrant County and each of the Consortium Members' organizations have years of experience assisting consumers with enrollment in Medicare, Medicaid and/or Children's Health Insurance Program (CHIP) and in safeguarding personal information. In addition to this experience, most Consortium Members have staff certified by the Texas Department of Insurance as Health Information Counseling and Advocacy Program (HICAP) Counselors who provide information about both public and private health insurance. Some of the internal procedures that are in place to safeguard Personally Identifiable Information (PII) are:

- Avoid keeping hardcopies, electronic copies of consumers' PII
- No files or documents containing PII or tax return information will be left unsecured and unattended on desk, printers and fax machines.
- Use a traceable delivery service and an opaque envelope or container when mailing PII or tax return information.
- Always return originals or copies of PII to consumers.
- Remind consumers that they must keep their PII locked and in a safe place that they will remember.



Arlington Office
United Way - Arlington
401 W. Sanford St., Ste.
2600
Arlington, TX 76011-7072
Tel 817-548-9595
Fax 817-277-6919

Northeast Tarrant Office
United Way - Northeast
221 Bedford Rd., Ste. 306
Bedford, TX 76022-6251
Tel 817-282-1160
Fax 817-282-1275

**Information &
Referral Services**
Tel 2-1-1
www.tarrantcounty211.org

**United Way's
Area Agency on Aging
of Tarrant County**
Tel 817-258-8000
Fax 817-258-8074
www.aaatc.org

**United Way
of Tarrant County**

1500 N. Main St., Ste. 200
P.O. Box 4448
Fort Worth, TX 76164-0448
Tel 817-258-8000
Fax 817-258-8005
www.unitedwaytarrant.org

- Do not send or forward e-mails with PII or tax return information and only transmit information in the direct service of consumers' health insurance needs.
- All portable equipment will be used in accordance with 45 C.F.R. § 155.260 by each staff member handling consumer PII while performing Navigator duties. (e.g. locking portable devices, password protect accounts that have access to PII)
- All medical records usage will comply with privacy requirements outlines in Texas Health and Safety Code Chapter 181 and electronic disclosure of information under Section §181.154.
- Consortium will not retain or utilize individual contact information for any other purpose other than the consumers' health insurance needs pertaining to the Marketplace enrollment.

Finally, we wanted to emphasize the Navigators' duties, as set by CMS, which are to provide personal enrollment assistance, either person-to-person or person-to-group, make presentation and provide information in group settings, like health fairs, community or workplace seminars. They will:

- 1) maintain expertise in eligibility, enrollment, and program specifications and conduct public education activities to raise awareness about the Exchange;
- 2) provide information and services in a fair, accurate and impartial manner;
- 3) facilitate selection of a Qualified Health Plan;
- 4) provide referrals to any applicable office of health insurance consumer assistance or health Insurance ombudsman for any enrollee with a grievance, complaint, or question regarding their health plan, coverage, or a determination under such plan or coverage; and
- 5) provide information in a manner that is culturally and linguistically appropriate to the needs of the population being served by the Exchange.

Thus far, the Consortium has reached out, educated and informed over 100,000 Texans who are eligible to enroll in the marketplace. Navigators have been present in the community and participated in over 852 events and answered thousands of phone calls directly from consumers. The United Way of Tarrant County stands behind the integrity of CHIMES navigators and the training measures that have been placed at a federal and organizational level.



Arlington Office
United Way - Arlington
401 W. Sanford St., Ste.
2600
Arlington, TX 76011-7072
Tel 817-548-9595
Fax 817-277-6919

Northeast Tarrant Office
United Way - Northeast
221 Bedford Rd., Ste. 306
Bedford, TX 76022-6251
Tel 817-282-1160
Fax 817-282-1275

**Information &
Referral Services**
Tel 2-1-1
www.tarrantcounty211.org

**United Way's
Area Agency on Aging
of Tarrant County**
Tel 817-258-8000
Fax 817-258-8074
www.aaatc.org