



<b>TO:</b> FFE Steering Committee
<b>FROM:</b> Consumer Assistance Advisory Committee Co-Chairs  <b>Anna Strong MPH, MPS</b> Director of Health Care Policy Arkansas Advocates for Children and Families  <b>Kurt A. Knickrehm</b> Vice President, Employee Benefits Services Regions Insurance  <b>Creshelle R. Nash MD, MPH</b> Consultant, Arkansas Minority Health Commission University of Arkansas for Medical Sciences
<b>SUBJECT:</b> Recommendations from the Consumer Assistance Advisory Committee
<b>COMMITTEE TOPIC: AR IN PERSON ASSISTER ON-GOING MONITORING</b>
<b>DATE:</b> September 27, 2012

**PART I - RECOMMENDATIONS**

A. **RECOMMENDATION SUMMARY:** The Consumer Assistance Advisory Committee (CAAC) discussed the topic of AR IPA Entity Monitoring at the committee meeting on September 14.

<b>The Steering Committee is being asked to vote on the following recommendations:</b>
1. Appropriate IPA monitoring methods;
2. Appropriate monitoring activities; and,
3. Appropriate IPA performance metrics.

B. **RECOMMENDATION DETAILS:** The Consumer Assistance Advisory Committee provides the following recommendations for the Steering Committee’s adoption.

**I. What are the Appropriate IPA monitoring methods?**

The AID has requested two (2) full time staff from a Federal grant funding application recently submitted. These two staff will be responsible for monitoring the activities of the IPA entities. Staff will conduct monitoring in a variety of ways. The following are the recommended on-going monitoring methods:

1. Monthly/quarterly reports;



2. Desk audits;
3. On-site evaluations (formal or informal);
4. Service delivery observation, including outreach and education;
5. Collection of consumer feedback (Accountability to consumers).

## II. What are the Appropriate IPA monitoring requirements?

### Reporting Requirement recommendations for IPA entities:

The AID will provide the entities with an electronic solution for all reporting requirements. The electronic solution will allow real time or aggregate reporting dependent on the preference of the entity but no less than monthly during the open enrollment period. The Department will determine after the open enrollment period the frequency that is needed. This will ensure consistency and uniformity with all required reporting. The Department will provide technical assistance as needed and requested on all elements contained in this report. The following list contains the reporting requirements for the entities that will be required on a monthly and quarterly basis.

1. Number of trained IPAs employed, and/or number of volunteers meeting certification requirements associated with the entity;
2. Number of consumers with whom the entity facilitated enrollment separated by target populations and patient demographics and in aggregate if known (i.e., insurance status, income, gender, age, race and ethnicity, primary language, number of family dependents);
3. Existing relationships/relationship building with orgs in communities/populations you are serving – who are they and how they are used to increase awareness of the exchange and facilitate enrollment;
4. Description of types of group outreach events, number of events, and locations of each;
5. Number and types of assistance activities that were provided (telephone calls, web, person to person visits, group/public outreach events and the number of people in attendance);
6. Number of complaints and appeals received, reasons, whether the complaint was applicable to the IPA entity or qualified health plan,
  - a. If the complaint was relative to the IPA entity provide reason, investigation undertaken and results, corrective action plans, disposition of complaint(resolved and unresolved), resolution, progress toward achievement for unresolved complaints;
  - b. If relative to the qualified health plan, number of referrals made;
7. Individual access barriers encountered, how they were resolved, time needed to resolve;
8. Number of referrals to other programs outside of the exchange (e.g. VA insurance)



### **III. Desk Audits:**

**Desk Audits will be performed by AID staff to confirm the following requirements are met (the Department may request the entity to send in copies of certain records or perform checks in house based on records already submitted at the time of application)**

1. The entity is current with payment of Arkansas taxes
2. Confirm IPA entity application acceptance and certification requirements have been met; (this will be conducted and communicated to the monitoring staff at the time of confirmed application acceptance and confirmed certification);
3. Confirm entity contracts are signed and approved;
4. Confirm the entity is current with payment of Federal and State as taxes;
5. Confirm IPA entity's submission of the final\_targeted consumer outreach plan was received by AID, within 60 days after the start of contract;
6. Confirm approval of final\_targeted consumer outreach plan submitted to the AID 60 days after the start of contract;
7. Confirm monthly/quarterly reporting submission timeliness and accuracy;
8. Confirm report submission timeliness and accuracy;
9. Confirm documented process used to investigate and resolve complaints and grievances against IPA individuals and/or entities.

### **IV. On-Site Evaluation:**

**On site evaluation will be performed by AID staff to monitor the following activities;**

1. Confirm number of IPAs associated with the entity employed, contracted and/or volunteer;
2. Confirm the entity meets all State contract requirements;
3. Monitor aggregate and individual complaints and grievances against IPAs, identify number, reason, resolution, corrective action plans, progress toward achievement;
4. Description of existing relationships and/or relationship building with organizations in communities/populations you are serving – who are they, and description of the services provided to increase awareness of the exchange and/or facilitate enrollment;
5. Review internal policies and guidance for staff to ensure appropriate agreement with the goals and objectives;
6. Confirm that the entity has an evaluation method to evaluate performance of the IPA work;
7. Review community and consumer feedback about how the IPA entity is performing;



- 8 Review overall contract compliance;
- 9 Collection of standards and best practices.

**V. Service delivery observation, including outreach and education:**

- 1. Confirm provision of services meet certification requirements.
- 2. Secret shopping (monitoring) will be used to ensure IPAs are remaining impartial, and in compliance with Federal ACA regulations.

**VI. Collection of Consumer Feedback:**

- 1. The entity is required to collect consumer feedback about the efficacy of their services, however, the methodology for doing so will be determined by the entity.

**VII. Performance Metrics:**

The CAAC decided to defer discussion regarding performance metrics until the next meeting in October regarding entity reimbursement options.

**1. PART II - BACKGROUND AND DISSENTING OPINIONS**

The Consumer Assistance Advisory Committee convened on September 14, 2012, from 1 p.m. to 4 p.m. at the Arkansas Insurance Department. The purpose of the meeting was to make recommendations to the Federally Facilitated Exchange Partnership Steering Committee (“the Steering Committee”) concerning topic area 5, IPA Entity On-Going Monitoring and Performance Metrics framed as the following:

1. Appropriate IPA monitoring methods;
2. Appropriate monitoring activities; and,
3. Appropriate IPA performance metrics.

The Committee had a lively, interactive discussion regarding IPA Entity On-Going Monitoring and Performance Metrics. There was agreement on all aspects provided in these recommendations. There were no dissenting opinions regarding this topic, however there was much discussion.

- 1. Committee members expressed concern about the potential burden of entities to provide regular reporting, especially smaller entities who do not have an infrastructure to support reporting activities. The Committee agreed that no reporting would be required that does not have a specific purpose and use and that the electronic system built by the State must be flexible enough to allow reporting in real time and/or aggregate reporting methods. There was also discussion regarding the ability to track activities for the Federal Navigator Program. A recent call with the Federal Government revealed that there has been no discussion to date around coordination and integration of Federal



required reporting for the Federal Navigator Program and the State IPA programs. The AID will work with the Federal Government to achieve a coordinated approach, the details of which are to be determined.

2. The CAAC also discussed the idea of secret shopper observation which has been identified as a monitoring method in other states. “Secret shopper” is an observation method where an employee of the AID would observe the work of IPA entities without the entity knowing they are there (primarily used at group events). After some discussion, the committee voted to allow secret shoppers as long as the entity knows when they contract with the Department that this will be a method of observation.
3. The CAAC began to discuss performance metrics but as the discussion began, the subject repeatedly came back to reimbursement of the IPA entities. Where that is the next month’s topic, the CAAC decided to defer that conversation until then.

The Consumer Assistance Advisory Committee thanks the Steering Committee for the opportunity to provide recommendations for the successful implementation of the Navigator Program. We look forward to the Committee’s decisions in this regard.