



# Assisters Policies for PY 2025

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## Georgia Access Policy Manual: Assister Policies

### Change Log

Date	Modified By	Sections	Program Change Description
11/01/2024	Georgia Access	All	Initial publication.

## Georgia Access Policy Manual: Assister Policies

### 1 Overview

#### 1.1 Purpose

This document outlines the policies related to Georgia Access Assisters, which include Navigators and Certified Application Counselors (CACs), and their governing organizations, Navigator Grantees and Certified Application Counselor Designated Organizations (CDOs), respectively. This document is updated at least annually.

#### 1.2 Background

Georgia Access is a division within the Office of Commissioner of Insurance and Safety Fire (OCI). The Georgia Access Division is responsible for operating and managing Georgia's State-based Exchange (SBE). Georgia Access operated as a State-based Exchange on the Federal Platform (SBE-FP) for plan year (PY) 2024 and transitioned to a full SBE for PY2025. Starting November 1, 2024, consumers can shop for and enroll in coverage through Georgia Access ([GeorgiaAccess.gov](https://GeorgiaAccess.gov)) for PY 2025. Consumers can also work with a web broker, insurance company, or Certified Agent to shop for and enroll in coverage.

#### 1.3 Key Terms

**Georgia Access Certification:** Navigators and CACs who want to help consumers apply for and understand health coverage through Georgia Access must be certified by the State. The certification process consists of completing training modules, passing an exam, and attesting to adhere to all Georgia Access policies and procedures.

**Georgia Access Certified Application Counselors (CACs):** Personnel affiliated with a Certified Application Counselor Designated Organization (CDO) (either employees or volunteers) who are licensed by the State and certified by Georgia Access to help consumers apply for and understand their health coverage options, but who cannot advise on which qualified health plan (QHP) to select. CACs are required to provide consumers with fair, accurate, and impartial information about health coverage options and available financial assistance.

**Georgia Access Certified Application Counselor Designated Organizations (CDOs):** Public or private organizations that provide services to underserved consumer populations. CDOs may include hospitals, Federally Qualified Health Centers, health care providers, nonprofit organizations, and state or local government agencies. CDOs are responsible for overseeing the work of individual CACs, including training, day-to-day management, and activity monitoring. Additionally, CDOs are required to conduct a minimum of one outreach, education, and enrollment event concerning health insurance coverage opportunities for consumers per reporting period.

**Georgia Access Navigators:** Individuals affiliated with a Navigator Grantee Organization either as an employee or volunteer, who are licensed by the State and certified by Georgia Access to help consumers apply and understand their health coverage options, but who cannot advise on which QHP to select. Navigators are required to provide consumers with fair, accurate, and impartial information about health coverage options and available financial assistance. Navigators also provide outreach and education to underserved and vulnerable populations.

**Georgia Access Navigator Grantees:** Organizations or a consortium of organizations that apply for and receive a grant funded by Georgia Access to provide health insurance application support to Georgia consumers. Navigator Grantees oversee the work of individual Navigators, including training, day-to-day management, and activity monitoring. Additionally, Navigator Grantees are required to conduct a minimum of three outreach, education, and enrollment events concerning health insurance coverage opportunities for consumers per reporting period.

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**Georgia Access Specialist License:** To operate as a CAC in the State of Georgia, individuals must obtain a Georgia Access Specialist License and a certification from the State. The Georgia Access Specialist License indicates that CACs are appropriately trained and prepared to support consumers in providing accurate and adequate assistance. CDOs are responsible for validating that their individual CACs have obtained a Georgia Access Specialist License.

**Navigator License:** To operate as a Navigator in the State of Georgia, individuals must obtain a Navigator License and certification from the State. The Georgia Access Navigator License indicates that Navigators are appropriately trained and prepared to support consumers in providing accurate and adequate assistance. provide accurate and adequate assistance to consumers. Navigator Grantees are responsible for validating that their individual Navigators have obtained a Navigator License.

## 2 Navigator Policies

### 2.1 Individual Navigator Requirements and Responsibilities

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.210

Navigators are individuals who are licensed by the State and certified by Georgia Access to provide support to consumers applying for health insurance coverage and financial assistance. Navigators provide outreach and education to uninsured individuals and underserved or vulnerable populations. This includes providing information on Georgia Access and how to apply for Georgia public assistance programs including Medicaid and PeachCare for Kids®. Navigators are prohibited from being compensated by consumers or Georgia Access insurance companies.

Individuals carrying out Navigator functions must obtain Georgia Access Certification and a Navigator License before assisting consumers. Navigators can begin the Navigator licensure process at any point, but they must obtain Georgia Access Certification before completing the licensure process.

#### 2.1.1 Navigator Requirements

##### 2.1.1.1 Georgia Access Certification for Navigators

Individual Navigators are required to have Georgia Access Certification to assist consumers on Georgia Access. To receive Georgia Access Certification, Navigators must complete a training course designed to provide Navigators with a comprehensive understanding of Georgia Access and key information to support consumers, and then pass a related exam with a score of 80% or higher. Upon passing the exam, Navigators receive their Georgia Access Certification. Navigators are required to complete certification annually. If the individual fails the exam three times, they receive a notification that they have failed certification. Individuals who fail the exam three times and want to re-take the exam are required to email the Georgia Access Navigator Inbox ([navigators@georgiaaccess.ga.gov](mailto:navigators@georgiaaccess.ga.gov)) indicating the reason they did not pass in the first three attempts and to request an appeal. Navigators who are granted an appeal and fail are required to retake the training and will not be able to take the exam for a period of 14 calendar days.

##### 2.1.1.2 Georgia Access Certification Training

Navigators are required to have Georgia Access Certification to assist consumers through Georgia Access. The following requirements must be met to complete certification:

- Register on the Learning Management System (LMS) at [certification.georgiaaccess.gov](https://certification.georgiaaccess.gov) as a Navigator
- Complete the Georgia Access Certification Training course on the LMS
- Pass the certification exam with a score of 80% or higher within three attempts

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- Attest to all Georgia Access policies and procedures

All Georgia Access Certification requirements can be accessed on the LMS at [certification.georgiaaccess.gov](https://certification.georgiaaccess.gov).

### 2.1.1.3 Navigator Licensing Requirements

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.210 (B); 45 CFR 155.260

Individual Navigator applicants must obtain a Navigator License in Sircon to operate as a Navigator in Georgia. The State manages and approves the Navigator License. Navigator applicants apply for the Navigator License by logging into Sircon and selecting the “Resident Navigator” license name and “Nav – Accident and Sickness” qualification code. Individual Navigators must meet the following requirements to obtain Navigator licensure:

- Be a resident of Georgia
- Complete and submit the Navigator License application in Sircon:
  - Complete the 10 hours of pre-licensing training from a state-approved course provider and satisfy all federal training requirements
  - Achieve a passing score on the Navigator pre-licensing examination (number of attempts follows OCI policy)
  - Complete the Citizenship Affidavit
  - Submit electronic fingerprints to facilitate a background check
  - Upload the Georgia Access Certificate PDF to Sircon verifying completion of the Georgia Access Certification Training
  - Upload a completed affiliation document to Sircon, signed by the Navigator Grantee, to prove affiliation with the Georgia Access Navigator Grantee
  - Submit payment of the \$55 Licensing Fee

#### 2.1.1.3.1 Deficient Applications

If a Navigator applicant has not completed the Navigator License application, does not provide all of the required information, or does not complete processing requirements, the State sends an email to notify the individual of their deficiency. The Navigator applicant has a grace period of 60 calendar days from the date of the email to correct the application and resubmit. If the deficiency has been corrected, the application is approved, and an email is sent with the license document as an attachment. If the Navigator applicant does not correct the deficiency before the expiration of the grace period, the application is closed.

#### 2.1.1.3.2 Complete Applications

Once all Navigator licensure criteria are met, the Navigator is notified by the State via email that their application is approved, and the license document is attached. Once approved, the Navigator applicant is eligible to provide Navigator services for consumers on Georgia Access.

#### 2.1.1.3.3 Application Timeline

Navigator applicants may complete requirements and apply for the Navigator License at any time during the year. However, if the Navigator applicant plans to participate at the start of Open Enrollment (OE), they must apply for the Navigator License and complete all required application components by October 15, prior to OE to allow sufficient time for approvals.

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Navigator applicants who apply for the Navigator License or provide required application components after October 15 are evaluated for approval on a rolling basis and can begin assisting consumers when their license is approved.

Training for the upcoming plan year is typically posted on the Georgia Access website in July before the plan year's OE begins. The training remains posted publicly through that plan year. (I.e., From July through November 30 there are two plan years' trainings posted: one for the current plan year, and one for the upcoming plan year.) During this period, Navigators who would like to assist consumers for the current plan year should complete the current plan year's training. Navigators who would like to assist consumers for the upcoming plan year should take the training for the upcoming plan year.

Below are examples of when Navigators can help consumers based on when they are certified.

- **Certified September 2024 for PY 2025:** Eligible to help consumers November 1, 2024 through December 31, 2025 for PY 2025 coverage.
- **Certified February 2025 for PY 2025:** Eligible to help consumers upon certification through December 31, 2025 for PY 2025 coverage.
- **Certified November 2025 for PY 2025:** Eligible to help consumers upon certification through December 31, 2025 for PY 2025 coverage; not eligible to help consumers for PY 2026 coverage during OE 2026.
- **Certified November 2025 for PY 2026:** Eligible to help consumers upon certification through December 1, 2026 for PY 2026 coverage.

### 2.1.1.3.4 Renewals

Returning Navigators must complete timely Navigator License renewals, including completing the latest plan year continuing education coursework and training materials, to be eligible to continue assisting consumers each plan year. Navigators must renew their Navigator License on an annual basis, before the beginning of the next plan year. Navigators who miss their renewal date have a 15-day grace period to renew their license. After this grace period passes, Navigators are required to reapply for licensure. Per O.C.G.A 120-2-3-.48 all pending Navigator License Renewal applications are closed each year by August 31.

### 2.1.2 Navigator Responsibilities

Georgia Access requires that Navigators provide support and education to consumers seeking assistance with applying for health coverage through Georgia Access or refer consumers for additional assistance. An individual Navigator operating on Georgia Access is responsible for:

#### Consumer Assistance:

- Assisting consumers with their applications for QHPs and financial assistance through the State consumer portal.
  - **Note:** A Navigator can help consumers apply for coverage through Georgia Access, fill out forms, and understand their eligibility results, but cannot provide health insurance advice on which plan(s) to select.
- Assisting consumers in understanding application requirements and all available plan options.
- Providing language and accessibility support.
- Providing support to consumers in applying for other health coverage options they may be eligible for, including Medicaid and PeachCare for Kids®.

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- Navigators are not required but are allowed to help consumers with appeal and exemption requests

### Education and Event Facilitation:

- Educating consumers on how to find providers and set up appointments.
- Educating consumers on how coinsurance, co-pays, and deductibles work.
- Educating consumers on the tax credits they are eligible for and how to apply them up front or reconcile later.
- Hosting community outreach events, including in areas with higher rates of uninsured consumers, and effectively marketing and communicating these events.

### Referral Facilitation:

- Providing referrals for consumers who need additional assistance, including but not limited to the Georgia Access Contact Center if there's an issue with their application, or to an agent if they need professional advice on which health coverage plan is best for them and their needs.

### Consumer Consent:

- Understanding the process of consent forms and how they should be successfully executed.
- Obtaining authorization from the consumer prior to collecting their personally identifiable information (PII) for a Georgia Access application. Individual Navigators must maintain record of this authorization for at least six years. Model authorization forms are not provided by Georgia Access for Navigators to use.

#### *2.1.2.1 Consumer Education and Georgia Access Outreach Toolkit*

Navigators are required to engage in public outreach for Georgia Access with the goal of increasing community awareness of Georgia Access and increasing the number of insured Georgians. This includes utilizing the Georgia Access Outreach Toolkit to share information about Georgia Access (e.g., through distributing newsletters or posting on social media).

#### *2.1.2.2 Accessible and Culturally Appropriate Communications*

Georgia Access requires that Navigators understand the needs of underserved and vulnerable populations and tailor their support to meet these needs. Navigators are expected to provide information and services to consumers in a manner that is accessible to persons with Limited English Proficiency and persons with disabilities. Language and accessibility services for consumers may include language interpretation assistance, accommodations for consumers with physical, developmental, and/or intellectual disabilities, or accommodations for consumers with cognitive, hearing, speech, and/or vision impairments (e.g., help with obtaining large print notices, reading notices aloud, and utilizing teletypewriter services).

Georgia Access requires that Navigators communicate with consumers in a manner that is culturally appropriate and that respects each consumer's cultural diversity. Navigators who are unable to assist consumers with language, accessibility, and culturally appropriate communication are required to refer the consumer to someone who can fill the need, whether that be another Navigator, an agent, or the Georgia Access Contact Center.

#### *2.1.2.3 Navigator Prohibited Activities*

Individual Navigators operating on Georgia Access are not permitted to:

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- Recommend, sell, solicit, or negotiate insurance plans.
- Offer advice about which QHPs are recommended for a consumer.
- Impose charges or receive any form of payment from consumer applicants/enrollees.
- Receive payment directly or indirectly from insurance companies in connection with the enrollment of consumers.
- Lobby for the insurance industry.
- Act as a Navigator and an insurance agent or work for a stop loss insurance company.
- Provide gifts<sup>1</sup> to an applicant or potential enrollee.
- Act as an intermediary between an employer and issuer that offers QHPs through Georgia Access.
- Solicit consumer for an application or enrollment assistance by going door-to-door or through unsolicited means of direct contact, including the following:
  - Calling a consumer to provide assistance without the consumer initiating the contact, unless the individual has a pre-existing relationship with the individual Navigator or Navigator Grantee.
  - Initiating any telephone call to a consumer using an automatic telephone dialing system or an artificial or prerecorded voice, except in cases where the individual Navigator or Navigator Grantee has a relationship with the consumer.
- Use Georgia Access funds to purchase gifts or promotional items that market or promote the products or services of a third party.

### 2.2 Navigator Grantee Requirements and Responsibilities

Navigator Grantees are organizations that manage Navigators operating on Georgia Access and provide oversight of Navigator activities. Georgia Access operates a grant program in which organizations, or a consortium of organizations, apply to receive a grant from the State and to become contracted Navigator Grantees. The Georgia Access Navigator Grant Program offers funding to grantees to facilitate outreach, education, and support consumers with the health insurance application process.

#### 2.2.1 Navigator Grantee Eligibility

Organizations eligible to be a Navigator Grantee in Georgia include:

- Nonprofit organizations that have a 501(c)(3) status with the Internal Revenue Service (IRS)
- Local government agencies and special districts
- Education organizations
- Public housing organizations
- City or county governments
- Native American tribal governments or organizations
- Independent school districts
- Institutions of higher education
- Public housing authorities
- Small, medium, or large for-profit businesses
- Community and consumer-focused groups

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<sup>1</sup> According to 45 CFR 155.210 (d)(6), gifts include gift items, gift cards, cash cards, cash, and promotional items that market or promote the products or services of a third party but does not include the reimbursement of legitimate expenses incurred by a consumer to receive Exchange application assistance, such as travel or postage expenses.



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- Trade, industry, and professional associations
- Commercial fishing industry organizations
- Ranching and farming organizations
- Chambers of commerce
- Unions
- Resource partners of the Small Business Administration

### 2.2.2 Navigator Grant Application

Organizations interested in becoming Navigator Grantees are required to complete the Navigator Grantee application posted publicly on the Georgia Access website at [georgiaaccess.gov/partners/navigators](https://georgiaaccess.gov/partners/navigators).

#### 2.2.2.1 Navigator Grant Application Timeline

Georgia releases the Navigator Grantee application no later than May of each year. Applicants must respond by the due date unless the State grants an extension to all applicants.

### 2.2.3 Navigator Grantee Responsibilities

Georgia Access requires that Navigator Grantees oversee and manage Navigators and act as a conduit of information between the Navigators and Georgia Access. Responsibilities of Navigator Grantees include the following:

- Comply with all applicable federal and state laws.
- Have affiliated or intent to affiliate at least one certified and licensed Navigator (as a paid employee or volunteer) within 60 days of selection.
- Confirm all Navigators are properly trained.
- Maintain expertise in eligibility, enrollment, and program specifications.
- Monitor Navigators and verify they are annually licensed.
- Collect reports from Navigators and provide a consolidated Navigator Grantee Monitoring Report to Georgia Access on a monthly, quarterly, and yearly basis.
- Comply with all requests from the State for additional information.
- Manage grant funds effectively and protect state dollars.
- Attend monthly meetings with Georgia Access to review progress, receive instruction, and offer recommendations for improvement.
  - Meetings are mandatory before and during OE; after OE, they are held as needed.
- Review and implement changes to policy and procedures received from Georgia Access; confirm these are understood and carried out by Navigators.
- Ensure Navigator and Navigator Grantee compliance with all agreed-upon Georgia Access policies and procedures.
- Verify additional instruction or educational requirements required for Navigators are carried out as instructed by Georgia Access.
- Report to Georgia Access any behavior displayed by a Navigator that has a negative impact or reflects negatively on the Navigator Grantee or Georgia Access.
- Monitor privacy and security standards, conflict of interest standards, and PII standards consistent with the Navigator Grantee Certification Agreement.
- Report on any privacy and security incidents, including misuse or loss on consumer PII.
- Conduct a minimum of three outreach, education, or enrollment events concerning health coverage opportunities. Outreach and education events are intended to proactively educate

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Georgia consumers about minimum essential coverage, Georgia Access, and services available in Georgia to increase enrollment in health coverage.

- Ensure consumer applicants are informed prior to receiving assistance of the functions and responsibilities of Navigators, including that Navigators are not acting as tax advisors or attorneys when providing assistance, as Navigators are not permitted to provide tax or legal advice within their capacity as Navigators.
- Provide targeted assistance to serve underserved or vulnerable populations.
- Provide information and services in a fair, accurate, and impartial manner.

### 2.2.3.1 *Outreach, Education, and Enrollment Event Requirements*

Georgia Access requires that Navigator Grantees hold a minimum of three outreach, education, or enrollment events. The events can be organized by the Navigator Grantee to conduct outreach in a specific community area or can include joining an existing event (e.g., setting up a booth at a County Fair).

Georgia Access requires Grantees to advertise, connect with consumers, and provide materials for each event. Specifics include:

- **Advertisement:** Must be advertised to consumers through at least two channels (e.g., online, print, social media, posters, or email).
- **Consumer Connection:** Must include sign-in sheets and contact-me sheets so the number of consumers contacted can be tracked and so consumers can leave their information and request that a Navigator reach out to them.
- **Staffing & Materials:** Must be appropriately staffed by Navigators. The Navigators must have appropriate educational materials available for consumers. All events should have multimedia equipment necessary to facilitate consumer enrollments in health insurance coverage or a walk-through of available online resources of Georgia Access.

Georgia Access does not require that Navigator Grantees receive approval from or notify the Exchange ahead of an event, but they must follow the allowable event types and guidelines as specified in the Navigator Grantee Agreement. Navigator Grantees are required to provide an event overview and submit reports. Failure to adhere to event guidelines specified in the Navigator Grantee Agreement results will result in contract review for remediation or termination.

### 2.2.4 *Navigator Grantee Prohibited Activities*

Under Georgia Access, Navigator Grantees are not permitted to:

- Imposing charges or fees on consumers for application or other assistance, including receiving referral fees from Certified Agents.
- Receiving any consideration directly or indirectly from any health insurance company or insurance company of stop loss insurance in connection with the enrollment of any individuals in a QHP or a non-QHP.
- Providing gifts of any value to an applicant or potential enrollee as an inducement for enrollment.
- Soliciting any consumer for an application or enrollment assistance by going door-to-door or through unsolicited means of direct contact.
- Calling a consumer to provide assistance without the consumer initiating the contact unless the individual has a pre-existing relationship with the individual.

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- Initiating any telephone call to a consumer using an automatic telephone dialing system or an artificial or prerecorded voice, except in cases where the individual has a relationship with the consumer.
- Recommend, sell, solicit, or negotiate insurance plans.

### 2.2.4.1 Navigator Grant Funding Restrictions

Navigator Grant funding must be used exclusively for the project goals identified in the Navigator Grantee's application or agreed upon subsequently in writing with the State. Navigator Grantees found to be using State funding in restricted ways, will stop receiving funding and be barred from acting as Navigator Grantee in the future.

Navigator Grant funding issued by the State may not be used to:

- Cover the costs to provide direct health care services to individuals.
- Match any other federal or state funds.
- Provide services, equipment, or support that are the legal responsibility of another party under federal or state law (such as vocational rehabilitation or education services) or under any civil rights laws.
  - Such legal responsibilities include, but are not limited to, modifications of a workplace or other reasonable accommodations that are a specific obligation of the employer or other party.
- Supplant existing state, local, or private funding of infrastructure or services such as staff salaries, etc.
- Cover any pre-award costs.
- Carry out services that are the responsibility of Georgia Access, such as conducting eligibility determinations or transferring consumer enrollment information.
- Assist consumers outside of Georgia. Georgia Access Navigators should refer consumers outside of Georgia to Navigators in their state, the HealthCare.gov Call Center, and other resources within the state where the consumer resides for assistance.
- Fund staff retreats or promotional giveaways.
- Purchase gifts, gift cards, or promotional items that market or promote the products or services of a third party that would be provided to any consumer or potential enrollee.
- Lobby; organizations can lobby at their own expense if they segregate state grant funds from other financial resources used for that purpose.
- Fund any other goods, services, or activities prohibited by the terms and conditions of the Navigator Grantee Agreement.

## 2.3 Oversight and Compliance

Georgia Access monitors Navigator Grantee and Navigator activities and performance through Navigator Grantee-submitted reports.

### 2.3.1 Monitoring and Reporting

Georgia Access is required to monitor Navigator Grantees and Navigators to confirm they are properly utilizing state funds and meeting their contractual obligations.

Georgia Access conducts the following activities to monitor Navigator Grantees:

- Review monthly, quarterly, and annual Navigator Reports to assess effectiveness and determine remediation or support required.

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- Follow up with Navigator Grantees that do not provide complete or timely metrics.
  - Navigator Grantees that continually fail to meet requirements may be subject to penalties, such as withholding of funding or contract termination.
- Review yearly independent financial audit reports.
- Request and review ad hoc reports as necessary.
- Review and respond to reported complaints and issues.

Georgia Access requires that Navigator Grantees provide monthly, quarterly, and annual reports by the due dates established by Georgia Access and should be sent to the Navigator inbox ([navigators@georgiaaccess.ga.gov](mailto:navigators@georgiaaccess.ga.gov)).

### 2.3.2 Navigator Grantee Termination and Withdrawal

Georgia Access may decide to terminate a Navigator Grantee if the Grantee does not meet the terms of the Navigator Grantee Agreement. Termination determinations are made due to findings during periodic monitoring or compliance issues reported by Georgia Access stakeholders. All complaints and compliance issues are investigated by Georgia Access and OCI, respectively.

A Navigator Grantee may also decide they no longer wish to participate in the Georgia Access program and withdraw voluntarily through a manual request.

If a Navigator Grantee is terminated or withdraws from Georgia Access, future grant funding will not be distributed for the remainder of the contract period.

### 2.3.3 Non-Compliance Issues

Georgia Access holds consumer safety and compliance issues as a top priority. Issues may be reported to Georgia Access by consumers, Georgia Access Enhanced Direct Enrollment (EDE) Partners (web brokers and insurance companies), agents, or other Navigators or CACs, or they may be identified through regular Georgia Access monitoring activities. The following issue types are investigated by Georgia Access:

- A Navigator Grantee or Navigator is suspected of committing fraud.
- A Navigator Grantee or Navigator commits a privacy and/or security incident.
- A Navigator Grantee or Navigator fails to comply with the non-conflict of interest requirement, Navigator Grantee Monitoring Report standards, Georgia Access policies and procedures, or another OCI regulation.

## 3 Certified Application Counselor (CAC) Policies

### 3.1 Individual CAC Requirements and Responsibilities

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.225

CACs are individuals who are licensed and certified by the State to provide support to consumers applying for health insurance coverage and financial assistance. CACs provide information on Georgia Access and how to apply for Georgia public assistance programs, including Medicaid and PeachCare for Kids®. CACs are prohibited from being compensated by consumers or Georgia Access insurance companies.

Individuals carrying out CAC functions must obtain Georgia Access Certification and a Georgia Access Specialist License before assisting consumers. CACs can begin the licensure process at any point, but they must obtain Georgia Access Certification before completing the licensure process.

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### 3.1.1 CAC Requirements

#### 3.1.1.1 Georgia Access Certification for CACs

Individual CACs are required to have Georgia Access Certification to assist consumers on Georgia Access. To receive Georgia Access Certification, CACs must complete a training course designed to provide CACs with a comprehensive understanding of Georgia Access and key information to support consumers, and then pass a related exam with a score of 80% or higher. Upon passing the exam, CACs receive their Georgia Access Certification and three CE credits towards their CE requirement. CACs are required to complete certification annually. Individuals who fail the exam three times and want to re-take the exam are required to email the Georgia Access CAC Inbox ([CDOs@georgiaaccess.ga.gov](mailto:CDOs@georgiaaccess.ga.gov)) indicating the reason they did not pass in the first three attempts and to request an appeal. CACs who are granted an appeal and fail are required to retake the training and will not be able to take the exam for a period of 14 calendar days.

#### 3.1.1.2 Georgia Access Certification Training

CACs are required to have Georgia Access Certification to assist consumers through Georgia Access. The following requirements must be met to complete certification.

- Obtain a Georgia Access Specialist License
- Register on the LMS at [certification.georgiaaccess.gov](https://certification.georgiaaccess.gov) as a CAC
- Complete the Georgia Access Certification Training course on the LMS
- Pass the certification exam within three attempts
- Attest to all Georgia Access policies and procedures

All Georgia Access Certification requirements can be accessed on the LMS at [certification.georgiaaccess.gov](https://certification.georgiaaccess.gov).

#### 3.1.1.3 CAC Licensing Requirements

Individual CACs must obtain a Georgia Access Specialist License in Sircon to operate as a CAC in Georgia. The State manages and approves the Georgia Access Specialist License. CAC applicants apply for the Georgia Access Specialist License by logging into Sircon and selecting the “Georgia Access Specialist” license name and the “Georgia Access Specialist” qualification code. Individual CACs must follow the process below to obtain a Georgia Access Specialist License:

- Provide a residential or business address in Georgia
- Complete and submit the Georgia Access Specialist License application in Sircon:
  - Complete the 10 hours of pre-licensing training from a state-approved course provider and satisfy all federal training requirements
  - Achieve a passing score on the Georgia Access Specialist pre-licensing examination (number of attempts follows OCI policy)
  - Complete the Citizenship Affidavit
  - Submit electronic fingerprints to facilitate a background check
  - Upload the Georgia Access Certificate PDF to Sircon verifying completion of the Georgia Access Certification Training
  - Upload a completed affiliation document to Sircon, signed by the CDO, to prove affiliation with the Georgia Access CDO
  - Submit payment of the \$55 Licensing Fee

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### 3.1.1.3.1 Deficient Applications

If a CAC applicant has not completed the Georgia Access Specialist License application or does not provide all of the required information, the State will send an email notifying them of their deficiency. The CAC applicant has a grace period of 60 calendar days from the date of the email to correct the application and resubmit. If the applicant does not correct the deficiency before the expiration of the grace period, the application is denied.

If a CAC applicant does not complete processing requirements as listed in [Section 3.1.1.3 CAC Licensing Requirements](#), is not affiliated with a CDO, or did not pass the background check, the application is denied via email from the State. If a CAC applicant's application is denied, they may reapply in Sircon after meeting all requirements and providing revised documentation.

### 3.1.1.3.2 Complete Applications

Once all Georgia Access Specialist Licensure criteria are met, the CAC applicant is notified via email that their application is approved with the license document attached. Once approved, the CAC applicant is eligible to provide CAC services for consumers on Georgia Access.

### 3.1.1.3.3 Application Timeline

CAC applicants may complete requirements and apply for the Georgia Access Specialist License at any time during the year. However, if the CAC applicant plans to participate at the start of OE, they must apply for the Georgia Access Specialist License, and complete all required application components by October 15, prior to OE to allow sufficient time for approvals.

CAC applicants who apply for the Georgia Access Specialist License after October 15 are evaluated for approval on a rolling basis and can begin assisting consumers when their license is approved.

Training for the upcoming plan year is typically posted on the Georgia Access website in July before the plan year's OE begins. The training remains posted publicly through November 30 of that plan year. (I.e., From July through November 30 there are two plan years' trainings posted: one for the current plan year, and one for the upcoming plan year.) During this period, CACs who would like to assist consumers for the current plan year should complete the current plan year's training. CACs who would like to assist consumers for the upcoming plan year should take the training for the upcoming plan year.

Below are examples of when CACs can help consumers based on when they are certified.

- **Certified September 2024 for PY 2025:** Eligible to help consumers November 1, 2024 through December 31, 2025 for PY 2025 coverage.
- **Certified February 2025 for PY 2025:** Eligible to help consumers upon certification through December 31, 2025 for PY 2025 coverage.
- **Certified November 2025 for PY 2025:** Eligible to help consumers upon certification through December 31, 2025 for PY 2025 coverage; not eligible to help consumers for PY 2026 coverage during OE 2026.
- **Certified November 2025 for PY 2026:** Eligible to help consumers upon certification through December 1, 2026 for PY 2026 coverage.

### 3.1.1.3.4 Renewals

Returning CACs must complete timely Georgia Access Specialist License renewals, including completing the latest plan year's continuing education coursework and training materials, to continue assisting consumers each plan year. CACs must renew their Georgia Access Specialist License on an annual basis, before the beginning of the next plan year. CACs who miss their renewal date have a 15-day grace

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period to renew their license. After this grace period passes, CACs are required to reapply for licensure. All pending Georgia Access Specialist License applications are closed each year by the last Friday of August.

### 3.1.2 CAC Responsibilities

Georgia Access requires that CACs provide support and education to consumers seeking assistance with applying for health coverage through Georgia Access or refer consumers for additional assistance.

An individual CAC operating on Georgia Access is responsible for:

#### Consumer Assistance:

- Assisting consumers with their applications for QHPs and financial assistance through the State consumer portal.
  - **Note:** A CAC can help consumers apply for coverage through Georgia Access, fill out forms, and understand their eligibility results, but cannot provide health insurance advice on which plan(s) to select.
- Assisting consumers in understanding application requirements and all available plan options.
- Providing language and accessibility support.
- Providing support to consumers in applying for other health coverage options they may be eligible for, including Medicaid and PeachCare for Kids®.
- CACs are not required but are allowed to help consumers with appeal and exemption requests

#### Education and Event Facilitation:

- Educating consumers on how to find providers and set up appointments.
- Educating consumers on how coinsurance, co-pays, and deductibles work.
- Educating consumers on the tax credits they are eligible for and how to apply them up front or reconcile later.
- Hosting community outreach events, including in areas with higher rates of uninsured consumers, and effectively marketing and communicating these events.

#### Referral Facilitation:

- Providing referrals for consumers who need additional assistance, including but not limited to the Georgia Access Contact Center if there's an issue with their application, or to an agent if they need professional advice on which health coverage plan is best for them and their needs.

#### Consumer Consent:

- Understanding the process of consent forms and how they should be successfully executed.
- Obtaining authorization from the consumer prior to collecting their personally identifiable information (PII) for a Georgia Access application. Individual Navigators must maintain record of this authorization for at least six years. Model authorization forms are not provided by Georgia Access for Navigators to use.

CACs are permitted to provide only in-person assistance and should not provide help remotely. However, in limited circumstances, such as during a state of emergency, CDOs will be informed by Georgia Access if there is a need to allow CACs to conduct services remotely.

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### 3.1.2.1 Consumer Education and Georgia Access Outreach Toolkit

CACs are required to engage in one public outreach for Georgia Access. CACs and CDOs are permitted to disseminate and post approved Georgia Access materials, updates, or other information on the website and in physical locations, with the goal of increasing community awareness of Georgia Access.

CDOs are permitted to provide Georgia Access information (per the Georgia Access Outreach Toolkit) through organization newsletters and social media posts, with the goal of reducing the number of uninsured Georgians. Each year, Georgia Access will release the Georgia Access Outreach Toolkit and Guidelines in advance of OE.

### 3.1.2.2 CAC Prohibited Activities

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.210

CACs operating on Georgia Access are not permitted to:

- Recommend, sell, solicit, or negotiate insurance plans.
- Offer advice about which QHPs are recommended for a consumer.
- Impose charges or receive any form of payment from consumer applicants/enrollees.
- Receive payment directly or indirectly from insurance companies in connection with the enrollment of consumers.
- Provide gifts<sup>2</sup> to an applicant or potential enrollee.
- Act as an intermediary between an employer and insurance company that offers QHPs through Georgia Access.
- Solicit consumer for an application or enrollment assistance by going door-to-door or through an unsolicited means of direct contact, including the following:
  - Calling a consumer to provide assistance without the consumer initiating the contact, unless the individual has a pre-existing relationship with the CAC or CDO.
  - Initiating any telephone call to a consumer using an automatic telephone dialing system or an artificial or prerecorded voice, except in cases where the CAC or CDO has a relationship with the consumer.

## 3.2 Certified Application Counselor Designated Organizations (CDO) Requirements and Responsibilities

Georgia Access operates a program in which organizations apply to become CDOs. Georgia Access CDOs are organizations that manage CACs operating on Georgia Access and provide oversight of CAC activities. CDOs have similar responsibilities to Navigator Grantees but do not receive any state funding.

### 3.2.1 CDO Eligibility

ASSOCIATED FEDERAL REGULATION: 45 CFR 155.225

To participate in Georgia Access, CDOs must meet Georgia Access CDO requirements to demonstrate an ability to adequately meet consumer needs and adhere to federal and state regulations. CDOs are public or private organizations that provide services to underserved consumer populations. Organizations that are eligible to become CDOs include but are not limited to:

- Hospitals

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<sup>2</sup> Gifts include gift items, gift cards, cash cards, cash, and promotional items that market or promote the products or services of a third party but does not include the reimbursement of legitimate expenses incurred by a consumer to receive Exchange application assistance, such as travel or postage expenses.



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- Federally Qualified Health Centers
- Health care providers
- Nonprofit organizations
- State or local government agencies

Organizations ineligible to become CDOs include entities that receive direct or indirect consideration from a health insurance issuer or stop loss issuer in connection with the enrollment of an individual into a QHP or non-QHP. Ineligible organizations include:

- Health insurance issuers or their subsidiaries
- Issuers of stop loss insurance and their subsidiaries
- Associations that include members of, or lobby on behalf of, the insurance industry
- Insurance agents, insurance agencies, or recipients of any direct or indirect consideration from any insurance issuer in connection with the enrollment in a health or dental plan
- Other organizations determined by the State to have a conflict of interest in providing objective consumer assistance

### 3.2.2 CDO Application

Organizations interested in becoming CDOs are required to complete the CDO application posted publicly on the Georgia Access website at [georgiaaccess.gov/for-partners/certified-application-counselors](https://georgiaaccess.gov/for-partners/certified-application-counselors). CDOs do not receive grant funding from the State.

#### 3.2.2.1 CDO Application Timeline

Georgia releases the CDO application no later than June of each year. Applicants must respond by the due date unless the State grants an extension to all applicants.

### 3.2.3 CDO Responsibilities

CDOs are responsible for managing and overseeing the activity of CACs within their organization. Responsibilities of CDOs include the following:

- Have affiliated or intend to affiliate at least one certified and licensed CAC within 60 days of application approval.
- Enter into an agreement with each paid employee or volunteer who performs CAC responsibilities and has obtained a Georgia Access Specialist License.
- Verify that CACs are providing adequate application assistance without charging consumers or making assistance conditional on any other relationship or purchase.
- Establish a process for reviewing and assessing CAC applications.
- Maintain a roster of all CACs operating in their organization.
- Ensure that all CACs complete and maintain Georgia Access Specialist Licensure.
- Establish processes for collecting CAC performance metrics and ongoing reporting.
- Adhere to the monitoring requirements defined by Georgia Access.
- Adhere to and regularly assess CAC privacy practices, conflict of interest requirements, accuracy of guidance provided by CACs, and training standards.
- Maintain a system for revoking certification of CACs as needed if they do not adhere to the rules and regulations.
- Coordinate and provide support for CACs; this may include developing and disseminating supplemental trainings or materials.
- Disseminate Georgia Access materials, updates, or other information to CACs as needed.

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### 3.2.4 CDO Prohibited Activities

Under Georgia Access, CDOs are not permitted to:

- Imposing charges or fees on consumers for application or other assistance, including receiving referral fees from Certified Agents.
- Receiving any consideration directly or indirectly from any health insurance company or insurance company of stop loss insurance in connection with the enrollment of any individuals in a QHP or a non-QHP.
- Providing gifts of any value to an applicant or potential enrollee as an inducement for enrollment.
- Soliciting any consumer for an application or enrollment assistance by going door-to-door or through unsolicited means of direct contact.
- Calling a consumer to provide assistance without the consumer initiating the contact unless the individual has a pre-existing relationship with the individual.
- Initiating any telephone call to a consumer using an automatic telephone dialing system or an artificial or prerecorded voice, except in cases where the individual has a relationship with the consumer.
- Recommend, sell, solicit, or negotiate insurance plans.

### 3.3 Oversight and Compliance

Georgia Access monitors CDO and CAC activities and performance through CDO-submitted reports.

#### 3.3.1 Monitoring and Reporting

CDOs are required to provide their roster of CACs to Georgia Access via the CDO inbox ([CDOs@georgiaaccess.ga.gov](mailto:CDOs@georgiaaccess.ga.gov)) along with any additions or terminations on a quarterly basis. CDOs are also required to submit collected data through quarterly reports.

Georgia Access reviews CDO reports to confirm CDOs are meeting requirements and to track their performance.

#### 3.3.2 CDO Termination and Withdrawal

Georgia Access may decide to terminate a CDO if the CDO does not meet the terms of the CDO Agreement. Termination determinations are made due to findings during periodic monitoring or compliance issues reported by Georgia Access stakeholders. All complaints and compliance issues are investigated by Georgia Access and OCI, respectively.

A CDO may also decide they no longer wish to participate in the Georgia Access program and withdraw voluntarily through a manual request.

#### 3.3.3 Non-Compliance Issues

Georgia Access holds consumer safety and compliance issues as a top priority. Issues may be reported to Georgia Access by consumers, Georgia Access EDE Partners (web brokers and insurance companies), agents, or other Navigators or CACs, or they may be identified through regular Georgia Access monitoring activities. The following issue types are investigated by Georgia Access:

- A CDO or CAC is suspected of committing fraud.
- A CDO or CAC commits a privacy and/or security incident.
- A CDO or CAC fails to comply with the non-conflict of interest requirement, CDO Monitoring Report standards, Georgia Access policies and procedures, or another OCI regulation.