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GEORGIA
ACCESS

**Georgia Access Plan Year (PY) 2025
Certified Application Counselor Designated
Organization (CDO) Application**

Released by Georgia Access on June 3, 2024
CDO Applications Due by September 24, 2024

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Section 1: Key Dates

- CDO Application release: June 3, 2024.
- CDO Applications due: September 24, 2024.
- Approved CDOs announced: July 15, 2024.
- PY 2025 CDO Performance Period begins: November 1, 2024.
- PY 2025 CDO Performance Period ends: December 31, 2025.

Section 2: Overview & Background

2.1 Georgia Access State-based Exchange

Senate Bill 65 was signed into law by Governor Kemp on May 2, 2023, granting Georgia the authority to establish and operate a State-based Exchange (SBE). Georgia received CMS approval to operate as an SBE on the Federal Platform (SBE-FP) for PY2024 and as an SBE for PY2025. For Open Enrollment (OE) 2025 beginning November 1, 2024, Georgia will operate solely as an SBE.

Georgia Access is designed to meet the needs of Georgia residents by increasing access to affordable and quality health insurance coverage. The SBE will replicate the federal Exchange model with multiple enrollment options for consumers, including a state consumer portal, certified agents, and direct enrollment through insurance companies or web-brokers certified as Georgia Access Enrollment Partners. As Georgia launches its SBE for 2025, community organizations will be vital to reaching underserved and uninsured populations across the State. Georgia will continue to operate a Navigator Program and a Certified Application Counselor (CAC) Program to partner with local organizations to achieve the shared goal of ensuring all Georgians have access to affordable and quality health insurance coverage.

2.2 Georgia Access CAC Program

Georgia Access is operating a CAC Program in accordance with [45 CFR § 155.225](#). Georgia's approach for its CAC Program is based on the CMS model. Organizations must apply for and be approved to operate a CAC Program. Once approved, organizations are designated as Certified Application Counselor Designated Organizations (CDOs). CDOs are responsible for overseeing affiliated CACs and providing quarterly reports to the State.

2.3 CDO Participation Period for PY 2025

The PY2025 participation period for CDOs is 12 months, beginning November 2024 and ending December 2025.

2.4 Contingencies

If the CDO or an individual CAC affiliated with the CDO commits fraud, the following consequences will be implemented:

- The CDO Agreement will be terminated.
- The organization will not be allowed to participate as a Grantee or as a CDO for a period of 3 years.

Section 3: Certified Application Counselors

3.1 CAC Requirements & Prohibitions

A CAC is an individual who is certified and licensed by the State to support consumers with applying for coverage on Georgia Access. CACs are required to be affiliated with a CDO, either as employees or volunteers. CACs must maintain strict privacy and security standards while assisting consumers.

CACs are expected to perform the following activities:

- Provide unbiased support for consumers by remaining free of prohibited conflicts of interest.
- Educate consumers on basic healthcare concepts, coverage options, and available financial assistance on Georgia Access.
- Support consumers with applying on Georgia Access.
- Support consumers in understanding their eligibility results and next steps.
- Provide consumers with language interpretation support, when available.
- Provide consumers with accessibility support, when available.
- Refer consumers to the Georgia Access Contact Center, as appropriate.
- Help consumers find certified Agents, as appropriate.
- Provide information on how to apply for Medicaid and PeachCare for Kids[®], as appropriate.

CACs are prohibited from performing the following activities:

- Recommend specific health insurance plans for consumers.
- Enroll a consumer into a health insurance plan.
- Provide gifts to a consumer to incentivize enrollment.
- Impose fees for providing consumer support and assistance.
- Request or receive compensation from consumers or third parties for assistance.
- Request or receive compensation from insurance companies.
- Request or receive compensation from Agents for consumer referrals.
- Act as an intermediary between an employer and health insurance company.
- Call consumers to offer assistance without the consumer initiating first contact.
- Use an automatic telephone dialing system or an artificial or prerecorded voice.
- Solicit any consumer for an application or enrollment assistance by going door-to-door or through unsolicited means of direct contact.
- Provide gifts of any value to an applicant or potential enrollee as an inducement for enrollment.

CACs are not required but are allowed to perform the following activities:

- Hold outreach activities or events.
- Help consumers with appeal and exemption requests.

3.2 CACs as Authorized Representatives

CACs are permitted to serve as an authorized representative (AR) if they are so designated by a consumer, and the consumer completes and signs the required form.

3.2 CAC Licensure & Certification

All individuals carrying out CAC functions must obtain a Georgia Access Specialist Licensure and Georgia Access Certification before assisting consumers. CACs can begin the Georgia Access Specialist Licensure process at any point, but they must obtain Georgia Access Certification before completing the licensure process. Licensure requirements are outlined on the [OCI website](#) and Georgia Access Certification requirements are outlined on the [Georgia Access website](#).

3.3 CAC-Provided Consumer Support

CACs are required to assist any consumer seeking assistance, even if that consumer is not a member of the communities or groups the applicant expects to target, as outlined in the CDO Application. If a CAC does not have the capacity or the knowledge to help an individual, the CAC must connect the individual with a resource that can provide consumer assistance in a timely manner. Potential outside resources and the corresponding assistance that could be provided to the individual include:

- Georgia Access Contact Center for questions about the application and enrollment.
- Certified Agents for assistance selecting an appropriate plan.
- Navigators for assistance with appeals and exemptions.
- Application completion on the consumer's behalf (if consent form is signed).
- Georgia Gateway to directly apply for Medicaid or PeachCare for Kids[®].
- Tax advisors or the Internal Revenue Service (IRS) for assistance regarding tax credits.

Section 4: CDOs

4.1 The Role of a CDO

A Certified Application Counselor Designated Organization (CDO) retains the primary responsibility of overseeing CAC activities and ensuring individual CACs meet program requirements. CDOs are expected to share information and marketing materials about Georgia Access with the public to increase awareness of health insurance options available through Georgia Access. Any CDO that fails to meet the standards outlined below can have their agreement terminated.

CDOs must:

- Comply with all applicable federal and state laws.
- Ensure SBE requirements for CACs and CDOs are upheld.
- Provide required data and reports on a quarterly basis to the State.
- Comply with all requests from the SBE for additional information.

4.2 Eligible & Ineligible Organizations

Eligible applicants include private and public entities capable of carrying out duties and program requirements as outlined in statutes, regulations, and this CDO Application. To be eligible, an organization must have a physical location or business address in Georgia.

Eligible organizations in Georgia include, but are not limited to:

- Nonprofit organizations that have a 501(c)(3) status with the 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
- Trade, industry, and professional associations
- Commercial fishing industry organizations
- Ranching and farming organizations
- Chambers of commerce
- Unions
- Resource partners of the Small Business Administration (SBA)
- Hospitals and health centers
- Health care provider groups
- Libraries

Ineligible organizations 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 qualified health plan (QHP) or non-QHP, in accordance with [45 CFR § 155.225](#).

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.

4.3 CDO Requirements & Prohibitions

CDO applicants must be capable of carrying out all CDO duties required by the Affordable Care Act (ACA), federal regulations, and the State, including but not limited to the following duties:

- Enter into a signed agreement with each CAC in which CACs agree to follow all federal and state regulations including privacy and security standards and non-conflict of interest requirements.
- Provide a proof of affiliation document that CACs submit to Georgia Access prior to receiving Georgia Access Specialist Licensure.
- Verify that CACs are providing adequate application assistance without charging consumers or making assistance conditional on any other relationship or purchase.
- Maintain a roster of all CACs operating in their organization.
- Ensure that all CACs complete Georgia Access Certification Training and maintain Georgia Access Specialist Licensure.
- Establish processes for collecting metrics for consumers served and provide quarterly reports to the State.
- Enforce privacy and security requirements.
- Screen potential CAC for prohibited conflicts of interest.
- Disseminate Georgia Access materials, updates, or other information to CACs as needed.
- Provide relevant Georgia Access information to consumers.
- Ensure that at least one individual CAC completes the required certification and licensure process within 30 days of signing the Georgia Access CDO Agreement. Organizations that do not have any affiliated CACs who are fully certified and licensed by this deadline may have their CDO agreement terminated.

Recipients must comply with the prohibited conflicts of interest as defined under [45 CFR § 155.215\(a\)\(2\)](#) and [45 CFR § 155.255](#).

In accordance with federal regulations [45 CFR § 155.210](#) and [45 CFR § 155.215](#), Georgia Access CDOs are prohibited from the following activities:

- 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 issuer or issuer 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
- Directly enrolling or assisting a consumer applicant to enroll onto a health plan

4.4 Intellectual Property

CDOs must comply with federal and state intangible property and copyright laws. The CDO may copyright any work that is subject to copyright and was developed, or for which ownership was acquired. The State of Georgia reserves a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use the work for Georgia Access purposes, and to authorize others to do so. The CDO is subject to applicable regulations governing patents and inventions.

4.5 Privacy & Security of Consumer Personally Identifiable Information (PII)

Protecting consumer information is of the highest importance and applicants should demonstrate the ability to ensure that consumer data is protected. Applicants must describe their policies and procedures in place to protect the privacy and security of consumers' PII as outlined in [45 CFR § 155.260](#) in their CDO Application Form.

4.6 Non-Discrimination

CDOs must administer their programs in compliance with federal civil rights laws that prohibit discrimination on the basis of race, color, national origin, disability, age and, in some circumstances, religion, conscience, and sex. This includes ensuring programs are accessible to persons with limited English proficiency.

CDOs must comply with all applicable federal and state statutes relating to non-discrimination, including, but not limited to:

- Title VI of the Civil Rights Act of 1964
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II, Subtitle A of the Americans with Disabilities Act of 1990
- Section 1557 of the Affordable Care Act
- Title IX of the Education Amendments of 1972
- Applicable federal religious nondiscrimination laws (<https://www.hhs.gov/conscience/religious-freedom/index.html>)
- Applicable federal conscience protection and associated anti-discrimination laws (<https://www.hhs.gov/conscience/conscience-protections/index.html>)

4.7 Ongoing Reporting

CDOs must cooperate with the State's efforts to evaluate the program. CDOs must provide the required quarterly reports to the State and additional information and reports as necessary to evaluate the program. The quarterly reports may include the following:

- An updated list of affiliated CACs
- Information regarding the performance of affiliated CACs and the type of consumer

- assistance provided
- Data regarding the number of consumers who have received application assistance

Section 5: Application Instructions

5.1 Submission

- All CDO Applications must be submitted via email to CDOs@GeorgiaAccess.ga.gov by **5:00 PM Eastern Time on September 24, 2024**, to participate as a CDO during Plan Year 2025. Applications received after the deadline will not be considered.
- The application (CDO Application Form) should be submitted as a single PDF document.
- To be considered complete and eligible for review, applicants must complete all sections of the application in their entirety. Applications determined to be ineligible or incomplete may be eliminated from further review.
- Applications will be reviewed and evaluated for completeness, accuracy, and thoroughness, but will not be formally scored.
- If applicants use assistive technology and are unable to access materials on the website, including the form contained within the CDO Application package, they may email CDOs@GeorgiaAccess.ga.gov or contact OCI support at (404) 463-0240.
- The State reserves the right to contact applicants for additional information if needed.

5.2 Questions

Applicants may submit questions about the CDO Application to CDOs@GeorgiaAccess.ga.gov by **5:00 PM Eastern Time on July 15, 2024**. The State will post a list of questions and answers by July 30, 2024.

5.3 Applicants

Applications may be submitted from a single organization. Organizations are permitted to apply only once per plan year. Organizations may apply to participate as both a Georgia Access Navigator Grantee and a CDO.

Section 6: Application Form

The CDO Application Form includes three sections, listed and described below.

6.1 Applicant Information

Applicants must provide basic information about their organization including legal name, employer identification number (EIN), address, point of contact, and authorized organizational representative. Applicants must also provide information on the organization's privacy and security standards to secure PII. This section contains questions to screen applicants on obligations imposed by federal and state regulations regarding privacy and security standards.

6.2 Project Site(s)

Applicants must list all project site locations included under the CDO Application in this section. Applicants must provide a primary location and may include any additional site locations. Applicants may copy the Additional Project Location table as many times as needed to list all site locations.

6.3 Attestations & Signature

The Authorized Organizational Representative (AOR) must complete all information related to OCI reporting, conflict of interest disclosures, mandatory disclosures, and assurances. This section must be signed by the AOR for the CDO Application to be complete. This section contains all obligations imposed by federal and state regulations and other terms and conditions of the CDO Program, including all assurances. Digital signatures are acceptable.