

## **STATE HEALTH INSURANCE ASSISTANCE PROGRAM—SHIP**

### **PURPOSE**

The purpose of these Operating Standards is to establish the minimum requirements to be met by the State Health Insurance Assistance Program (SHIP) grantee, its subcontractors, and sponsored sites for program implementation.

### **BACKGROUND**

The SHIP program offers free person-centered health benefits counseling, unbiased information, and assistance to individuals who reside in Michigan and are Medicare and/or dually-eligible Medicare/ Medicaid beneficiaries. This includes both older adults and people with disabilities. SHIP services are also available to family members, caregivers and other individuals and groups that advocate or care for Medicare and dually-eligible Medicare/Medicaid beneficiaries.

The SHIP program is implemented statewide through a grant with a private non-profit organization. The SHIP grantee cannot be an agency which sells or markets insurance or insurance products. The SHIP grantee must maintain a central office located in Michigan and operate throughout Michigan via sponsored sites.

SHIP funding flows from the Administration for Community Living (ACL) through the Michigan Department of Health and Human Services, Aging and Adult Services Agency (AASA) to the grantee to provide SHIP services. Funding flows from the SHIP grantee to local subcontractors.

### **PROGRAM SCOPE**

The SHIP grantee administers a statewide program which has two major components:

1. It is a program of person-centered health benefit counseling services to Michigan's older adult population and those on Medicare by way of disability.
2. It is a volunteer program.

The SHIP grantee is responsible for the provision of health benefit information and counseling supported by a statewide network of paid and unpaid skilled professionals. The SHIP grantee utilizes these highly-trained paid and unpaid professionals to provide one-on-one health benefit counseling services to Michigan's Medicare and dually-eligible Medicare/Medicaid beneficiaries and their families, caregivers or representatives.

The SHIP grantee serves as the administrative agency for subcontractors who receive ACL funds to carry out SHIP functions at the local level through a grant award agreement and statement of work approved by AASA.

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At a minimum, the SHIP grantee performs the following functions:

- a. Advocates for Michigan beneficiaries at the local, state, and federal level.
- b. Supports local volunteer coordinators with recruiting, screening, training and retaining volunteers.
- c. Provides professional training and support to counselors, coordinators and other program partners.
- d. Provides technical assistance to subcontractors.
- e. Sets policy for provision of SHIP services.
- f. Ensures the consistency and quality of services provided through monitoring, feedback and corrective action.
- g. Serves on committees and workgroups on issues that impact Medicare and dually-eligible Medicare/Medicaid beneficiaries.
- h. Works in partnership with AASA on advocacy issues, program quality improvement projects, changes to program implementation and/or enhancements and on joint projects not specifically required by ACL funding, such as ADRC projects and ad hoc committees, etc.
- i. Responds to requests from AASA and other state agencies, partner agencies, legislators and others on constituent issues.
- j. Conducts outreach to inform the public, including local, state and federal government about the SHIP program and services provided.
- k. Accurately reports on program activities to ACL, AASA, and other funders.

In order to develop and support a statewide system that ensures Michigan beneficiaries get high quality benefits counseling and assistance services, the grantee must excel in technical knowledge and expertise and must be highly skilled in the following areas:

- a. General program administration and project management.
- b. Successful administration of volunteer programs.
- c. Understanding of and effective use of person-centered practices.
- d. Medicare/Medicaid eligibility, enrollment, coverage, claims and appeals processes.
- e. Health care billing statements and Medicare Summary Notices.
- f. Resources for prescription drug assistance.
- g. The Medicare Savings Program.
- h. Medicare supplemental insurance, including comparison of policies and pursuit of claims and refunds.
- i. Retiree health benefits.
- j. Health care options under managed care and Medicare Advantage plans.
- k. Long Term Care Insurance options.
- l. Medicare/Medicaid fraud and abuse.
- m. Quality Improvement methods and processes.
- n. Curricula development, training manual preparation, training and education using adult learning methods.
- o. ACL and AASA reporting requirements, reporting systems and data analysis.

## Operating Standards

### A. PROGRAM ORGANIZATION

1. The SHIP grantee shall operate as a Michigan private, non-profit corporation and maintain tax-exempt status under Section 501(c)(3) of the Internal Revenue Code.
2. The SHIP grantee shall not be operated by, or receive funds from, an organization which sells or markets insurance or insurance products.
3. The SHIP grantee (board of directors and staff) and subcontractors must adhere to a practice of disclosure, which will prevent individuals with any interest in the health insurance industry from becoming SHIP counselors.
4. The SHIP grantee shall have a board of directors with the authority and responsibility to conduct the business of the agency. The board of directors shall have adopted and operate according to written by-laws and in compliance with provisions of the Open Meetings Act.
5. SHIP services are to be provided through formal contractual agreements between the SHIP grantee and local agencies. Subcontractors of the SHIP grantee shall have written agreements with each sponsored SHIP site, whether funded or not. These sponsored site agreements must provide assurance that SHIP volunteers, at a minimum, will be offered mileage reimbursement for SHIP-related activities.
6. The SHIP grantee shall employ personnel competent to perform required duties. The SHIP grantee shall be able to demonstrate an organizational structure, including established lines of authority, and must operate under principles of affirmative action and be non-discriminatory in employment practices. The SHIP grantee shall ensure that subcontractors have an appropriate organizational structure (established line of supervision) for implementing the program.
7. The SHIP grantee shall have written personnel policies approved by its board of directors that include, at a minimum:
  - a. General conditions of employment.
  - b. Requirements for performance evaluations for all staff.
  - c. Language that prohibits workplace harassment, which is defined as “unwelcome verbal or physical conduct based on race, color, religion, sex (whether or not of a sexual nature and including same-gender harassment and gender identity harassment), national origin, age (40 and over), disability (mental or physical), sexual orientation, or retaliation.”
  - d. A statement prohibiting political patronage and lobbying.
  - e. Language outlining unacceptable political activities.

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- f. Language addressing drug-free workplace requirements.
  - g. A grievance procedure.
8. The SHIP grantee shall ensure that subcontractors have a written procedure governing recruitment, training, testing and supervision of volunteers. Program volunteers must be competent to perform required duties as determined by testing and performance evaluation.
9. The SHIP grantee shall ensure that subcontractors provide opportunities for team members, coordinators and counselors to expand their knowledge base, at least annually. Topics may be identified from performance evaluations.
10. The SHIP grantee shall ensure that subcontractors establish procedures for performance evaluations to be conducted of team members, counselors and coordinators, whether paid, unpaid or in-kind. Performance evaluations must determine whether minimum job requirements have been met. Minimum job requirements are determined by the SHIP grantee and include:
- a. A criminal background check prior to involvement with beneficiaries.
  - b. Participation in scheduled SHIP Update Trainings.
  - c. An established minimum number of contact hours with beneficiaries performing SHIP-related activities.
  - d. Regular, consistent and accurate reporting of SHIP activities using SHIP specified reporting instruments.
11. SHIP grantee staff must be proficient in the following health benefit and program administration areas:
- a. Volunteer Program Administration.
  - b. Person-centered planning and practices.
  - c. Medicare.
  - d. Medicaid.
  - e. Medigap Insurance.
  - f. Long Term Care Insurance.
  - g. Health Insurance (including retiree health benefits).
  - h. Preventive Services offered under Medicare.
  - i. Older adult learning and training methods.
  - j. Public outreach and education methods.
  - k. Leadership development methods.
  - l. Demographics of Michigan's Medicare and Medicaid population.
  - m. Knowledge of local, state, and federal government processes.
12. The SHIP grantee shall collect and disseminate timely and accurate health insurance information for subcontractors to share with their program staff and volunteers.

13. The SHIP grantee is responsible for statewide program oversight and evaluation under the direction of AASA. SHIP grantee staff must be available, as necessary, to provide technical assistance to SHIP subcontractors. The SHIP grantee must ensure that subcontractors provide team members, site coordinators and counselors with access to program coordinators while they are assisting beneficiaries.
14. SHIP grantee staff must receive:
  - a. Orientation to SHIP program, policies and procedures.
  - b. Snapshot of SHIP structure (funders, board, etc.).
  - c. Job description and expectations.
  - d. Resources, including access to SHIP internal and external partners.
  - e. Information and training on person-centered planning and practices.
15. The SHIP grantee must ensure that each subcontractor provides their program staff and volunteers:
  - a. Orientation to SHIP program.
  - b. Snapshot of SHIP structure (funders, board, etc.).
  - c. Job description and expectations.
  - d. Resources, including access to SHIP internal and external partners.
  - e. Information and training on person-centered planning and practices.
16. The SHIP grantee will comply with Suspension and Debarment requirements of Federal Regulation 2CFR, part 180. These regulations address annual certification that all employees and subcontractors are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department.
17. The SHIP grantee will comply with Procurement Standards found in Federal Regulation 2CFR, part 200.317-326. These standards address organizational and individual conflicts of interest during the selection, award and administration of contracts.

## **B. PROGRAM FUNCTION**

Requirements for SHIP Grantee:

1. The SHIP grantee operates according to a budget approved by AASA.

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2. The SHIP grantee operates according to the grant award agreement and statement of work approved by AASA.
3. The SHIP grantee shall permit AASA access to any books, documents, papers or other records of the contractor that are pertinent to the contract. Access shall also be granted to AASA to observe the operation of the program at local program sites.
4. The SHIP grantee must employ mechanisms approved by AASA for obtaining the views of service recipients about the quality of services received, and for evaluating the effectiveness/impact of the program, including future needs and demands on the program.
5. The SHIP grantee shall conduct an annual event recognizing persons involved in the SHIP program.
6. The SHIP grantee must develop contract standards, review applications for local SHIP sites, and the contracts must spell out how to run the program and service delivery targets.
7. The SHIP grantee must monitor for program compliance. The SHIP grantee must conduct a formal assessment of the performance of each SHIP subcontractor each year. A report to AASA should be submitted that covers: findings, corrective action plans, timelines for corrections, resolution of findings and follow-up conducted.
8. The subcontractor assessment tool must be approved by AASA and address, at a minimum:
  - a. ACL grant requirements and established benchmarks.
  - b. Compliance with SHIP Statewide Operating Standards.
  - c. Compliance with the terms of the grant.
  - d. Program accessibility (i.e., language, location, facilities, and beneficiary special needs).
  - e. Targeting plan for underserved populations.
  - f. Training and technical assistance needs.
  - g. Progress on resolving corrective action required by prior assessments.
9. The SHIP grantee shall coordinate the exchange of health insurance information between the staff of state departments/agencies, other pertinent federal agencies, including ACL, and grantee and subcontractor staff, including volunteers.
10. The SHIP grantee shall advocate for, and make recommendations for, improvement concerning consumer issues and complaints, related to the provision of health care, to agencies and departments of the state and federal government responsible for providing or regulating health insurance.

Requirements for both SHIP Grantee and Subcontractors:

11. The SHIP grantee and subcontractors shall maintain a financial management system that fully and accurately accounts for the use of all funds administered for SHIP.
12. The SHIP grantee and subcontractors shall maintain sufficient insurance to indemnify loss of federal, state or local resources due to casualty, fraud, or employee theft.
13. The SHIP grantee and subcontractors shall comply with all programmatic and fiscal reporting requirements established by AASA.
14. The SHIP grantee and subcontractors shall have written procedures to protect the confidentiality of personal information collected in the conduct of its responsibilities. The procedures must ensure that no information about a person is disclosed in a form that identifies the person without the informed consent of that person or of his or her legal representative. All client information shall be maintained in controlled access files. It is the responsibility of the SHIP grantee to determine if they are a covered entity with regard to HIPAA regulations and establish appropriate procedures for the use of protected health data and information.
15. The SHIP grantee and subcontractors shall have a procedure in place to address complaints from individual recipients of services.
16. The SHIP grantee and subcontractors shall publicize services by the means most effective in reaching the target population, especially to those in greatest economic or social need with particular attention to low-income minority individuals.
17. The SHIP grantee shall ensure that subcontractors offer translation and interpretive services upon request, and as needed.
18. The SHIP grantee and subcontractors shall locate SHIP service sites in collaboration with senior centers and other community agencies to the maximum extent feasible.
19. The SHIP grantee and subcontractors shall implement systems of referral to appropriate local, state and federal departments or agencies that provide assistance with problems related to health insurance coverage, including legal problems.

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