

Division of Aging & Adult Services
State Unit on Aging Policy



Subject: State Health Insurance Assistance Program and Senior Medicare Patrol
Policy Chapter: 3.4
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State Health Insurance Assistance Program and Senior Medicare Patrol

I. POLICY STATEMENT

This policy provides an outline of the Division of Aging and Adult Services (DAAS) operational policies, procedures and reporting requirements for the State Health Insurance Assistance Program (SHIP), Senior Medical Patrol(SMP) and the Medicare Improvements for Patients and Providers Act (MIPPA) programs.

II. APPLICABILITY

- A. All DES sub-grantees who receive funding to provide program services for:
 - 1. The State Health Insurance Assistance Program (SHIP);
 - 2. Senior Medicare Patrol (SMP); and
 - 3. Medicare Improvements for Patients and Providers Act (MIPPA).
- B. DAAS Employees of the SHIP, SMP, and MIPPA programs.
- C. Contractors, subcontractors, paid employees of contractors and subcontractors and Volunteers of the SHIP, SMP, and MIPPA programs.

III. AUTHORITY

Consolidated Appropriations Act of 2014

Division H - Title II - Centers for Medicare and Medicaid Services - Health Care Fraud and Abuse Control Account

Health Insurance Portability and Accountability Act of 1996

Pub L. 104.191

Medicare Improvements For
Patients and Providers Act of 2008

Pub L. 110-275

Older Americans Act (2020)

Pub L. 116-131
Title II (Administration on Aging)
Title IV (Activities for Health,
Independence, and Longevity)

Omnibus Budget Reconciliation Act
of 1990

Pub L. 101-508

Section 4359 - Health Insurance
Advisory Services for Medicare
Beneficiaries

Section 4360 - Health Insurance
Information, Counseling, and
Assistance Grants

45 CFR 75

Uniform Administrative
Requirements, Cost Principles, and
Audit Requirements for HHS
Awards

45 CFR 1331

State Health Insurance Assistance
Program (SHIP)

45 CFR 1321

Grants to State and Community
Programs on Aging - Subpart B -
State Agency Responsibilities

42 USC § 1395 (b-3), (b-4), (b-5)

Health Insurance for Aged and
Disabled

A.R.S. § 13-3623

Child or Vulnerable Adult Abuse;
Emotional Abuse; Classification;
Exceptions; Definitions.

A.R.S. § 14-5101

Definitions

A.R.S. § 46-451

Definitions; program goals

Administration for Community Living (ACL)

National SHIP/SMP Volunteer Risk and Program Manual

ACL Office of Healthcare Information and Counseling (OHIC)

Conflict of Interest: Identification, Remedy and Removal

IV. DEFINITIONS

Administration for Community Living (ACL): Federal agency that supports the needs of the aging and disability populations, their families and caregivers, and improves access to healthcare, long-term services, abuse prevention, rights protection, and more.

Area Agency on Aging (AAA): A public or nonprofit private agency that is contracted by the state of Arizona to provide SHIP, SMP and MIPPA services.

Arizona Health Care Cost Containment System (AHCCCS): Arizona's Medicaid agency that assists with healthcare costs for Arizona residents with limited income and resources.

Arizona Volunteer Risk Management Policy Manual (AZVRPM): Developed by the State SHIP Office to provide Arizona-specific guidance within the national policy framework of the ACL Volunteer Risk Management Policy Manual (VRPM), to assist Regional SHIPs and Regional SHIP Coordinators in the operation of Arizona SHIP/SMP volunteer programs.

Beneficiary: A person who is entitled to Medicare benefits and/or has been determined eligible for Medicare. Includes Medicare beneficiaries under the age of 65 with a disability.

Beneficiary Contact Form: Confidential form to track SHIP Performance measures, including topics discussed with the Beneficiary and their Representative. Information documented on the form also includes demographic information for the Beneficiary and whether the Beneficiary qualifies for SMP or MIPPA.

Centers for Medicare & Medicaid Services (CMS): Federal agency that administers the nation's major healthcare programs including Medicare, Medicaid, and the Children's Health Insurance Program (CHIP).

CMS Unique ID: A 7-character access code issued by CMS. SHIP Counselors are able to use the UniqueID system to obtain information from service representatives at 1-800-MEDICARE, to assist beneficiaries with claim-related issues and concerns.

Complaint Tracking Module (CTM): A program utilized by CMS to track and record alleged marketing misrepresentations, and where Beneficiaries may directly file complaints with CMS against a Medicare health care plan.

Community Partner Agency: Community organizations offering home and community-based services to adults age 60+ and/or individuals 18-59 with disabilities and/or long-term care needs.

Conflict of Interest (COI): Any real or perceived personal, philosophical, or financial interest that prevents or could prevent a person from performing a SHIP/SMP task objectively.

Counseling: Unbiased information, education, and assistance to a Beneficiary and/or their Representative performed by a trained Counselor. Discussion may include Medicare plans and programs, application assistance for limited income Beneficiaries applying for specialized plans and programs such as Medicaid, Medicare Savings, and Extra Help/Low Income Subsidy (LIS), and/or how to prevent, detect and report Medicare Fraud, Errors and Abuse.

DAAS Employee: Any full-time or part-time worker, or temporary paid or unpaid worker, who is employed directly by DES/DAAS.

Department of Health and Human Services (HHS): Federal department that enhances the health and well-being of all Americans by providing for effective health and human services and fostering sound, sustained advances in the sciences underlying medicine, public health, and social services.

Enrollment Event: Any event where enrollment of Beneficiaries is the key objective, and where Team Members aid the Beneficiary to submit an online or paper application. An Enrollment Event may be sponsored in partnership with another organization.

Gifts: Any payment, distribution, transfer, loan, advance, deposit, or other rendering of money, property, services, or anything of value, whether tangible or intangible.

Group Outreach and Education: Categorized into 3 types of activities/events to provide information and answer general questions to the public about the SHIP, SMP and MIPPA programs: 1) booths and/or exhibits; 2) Enrollment Events; and 3) interactive presentations (including virtual presentations).

Immediate Family Member: Pertaining to COI, a member of the household or a relative with whom there is a close personal or significant financial relationship.

In-Kind Status: An individual who performs SHIP/SMP duties and receives monetary compensation for their time and services from a program other than SHIP.

Low Income Subsidy (LIS): A federally funded program that helps people with Medicare pay for prescription drugs and lower the costs of Medicare prescription drug coverage.

Maltreatment: The abuse, neglect and/or exploitation of a child or Vulnerable Adult.

Media Outreach and Education: An activity in which general program or Medicare information is shared through a type of media, such as billboards, brochures, flyers, newsletters (email, print and electronic), newspapers, magazines, television, radio, websites and social media.

Medicaid: A joint federal and state program that helps with medical costs for eligible individuals with limited income and resources. Medicaid programs vary from state to state, but most health care costs are covered.

Medicare: Federal health insurance program for people 65+, certain younger individuals with disabilities and individuals with end-stage Renal Disease.

Medicare Abuse: Actions that are improper, inappropriate, outside acceptable standards of professional conduct, or medically unnecessary. Examples may include:

- Billing for medically unnecessary services;
- Overcharging for services or supplies; and
- Misusing billing codes to increase reimbursement.

Medicare Advantage/Prescription Drug System (MARx): System used to obtain billing information for Medicare advantage programs. Access is restricted and must be requested through CMS.

Medicare Error: An honest health care service or product mistake related to billing. A pattern of errors by a physician or provider could be considered a red flag or potential Medicare Fraud or Abuse if not corrected.

Medicare Fraud: Knowingly and willfully executing or attempting to execute deception or misrepresentation of fact for the purpose of receiving unauthorized or increased payment from the Medicare program. Examples may include:

- Billing provider billing Medicare for services or supplies not provided;
- Performing unnecessary services in order to bill Medicare for increased services;
- Billing of Medicare for rented medical equipment that has been returned; or
- Stealing a person's Medicare number or card and fraudulently submitting a Medicare claim.

Medicare Improvements for Patients and Providers (MIPPA): A federal program that supports states and tribes through grants to provide Outreach and assistance to eligible Beneficiaries to apply for benefit programs that help to lower the costs of their Medicare premiums and deductibles. MIPPA provides valuable support at the state and community levels for organizations involved in reaching and providing assistance to people who may be eligible for the Low Income Subsidy program (LIS), Medicare Savings Plan (MSP), and the Medicare Part D Prescription Drug Program. The initiative includes special efforts to target rural areas and Native American elders.

Medicare Part A: Covers inpatient hospital stays, care in a skilled nursing facility, hospice care, and some home health care.

Medicare Part B: Covers certain doctors' services, outpatient care, medical supplies, and preventative services.

Medicare Part C (Medicare Advantage): Comprehensive plans that include the same benefits as Parts A and B plus additional benefits.

Medicare Part D: A voluntary prescription drug plan available to people with Medicare Part A and/or Part B. It is also known as a Part D Plan (PDP).

Medicare Savings Plan (MSP): A Medicaid program that helps people with limited income pay some or all of their Medicare premiums, deductibles, and coinsurance.

Medigap: Medicare insurance sold by private insurance companies to fill "gaps" in Medicare coverage, such as deductibles, copayments, coinsurance.

Outreach: Presentations, distribution of information, conducting Enrollment Events, and participation in health fairs, senior fairs, and other community events.

Personally Identifiable Information (PII): Information which can be used to distinguish or trace an individual's identity.

Protected Health Information (PHI): Individually identifiable health information that is explicitly linked to a particular individual.

Regional SHIP Office (Regional SHIP): Local AAA office that provides SHIP services. Each office is designated to provide services to a specific area/region.

Representative: A family member or caregiver of a Beneficiary or other individual working on behalf of the Beneficiary.

SMP Information and Reporting System (SIRS): The SMP data system used to collect, track, assess and measure SMP program performance data.

SHIP/SMP Counselor (Counselor): Team Members trained in SHIP and/or SMP Counseling to offer information and assistance about a wide range of Medicare, Medicaid and Medigap matters; SMP Counselors are trained to answer basic SMP questions and provide individual education about how to prevent, detect, and report Medicare Fraud, Errors, and Abuse.

Senior Medicare Patrol (SMP): A program that works to resolve beneficiary complaints of potential healthcare Fraud in collaboration with state and federal partners.

SMP Resource Center: A central source of information, expertise, and technical assistance for SMP projects; is funded by the US Administration for Community Living, Department of Health and Human Services (HHS).

SHIP Tracking And Reporting System (STARS): The nationwide, web-based data system that facilitates the reporting of SHIP grantee activities to the federal government. STARS is the reporting platform for SHIP grantees and MIPPA grantees and communicates with the SMP national data reporting system, SIRS.

State Health Insurance Assistance Program (SHIP): A state program that receives funding from the federal government to provide to Beneficiaries and their Representatives free one-on-one assistance, Counseling, and education related to obtaining adequate and appropriate health insurance coverage. In providing SHIP, Team Members assess the Beneficiary's eligibility for specific assistance such as SMP and/or MIPPA.

State SHIP Office: Administration within DAAS' State Unit on Aging, that contracts for and oversees the implementation of the SHIP programs administered by Area Agencies on Aging, to ensure compliance with Older Americans Act program requirements.

Team Member: Paid, In-Kind, or Volunteer staff who provides services for the SHIP/SMP program.

Training Tracker (TRAX): The SMP training and tracking system; allows for taking, assigning and tracking SMP training and assessments.

Volunteer: Team Member who performs tasks on behalf of the SHIP/SMP program, including Counseling, data entry, marketing, administrative and/or training, without compensation or expectation of compensation.

Vulnerable Adult: As defined by A.R.S. § 46-451(A)(12), Vulnerable Adult means an individual who is eighteen years of age or older and who is unable to protect themselves from abuse, neglect or exploitation by others because of a physical or mental impairment. Vulnerable Adult includes an incapacitated person as defined in section 14-5101.

Volunteer Risk and Program Management Policies (VRPM): ACL-developed policies to assist SHIP and SMP grantees in managing and operating their Volunteer programs. The policies describe governing principles and values that shape and guide SHIP/SMP Volunteer Team Member involvement, set expectations regarding the management of Volunteer programs, delineate core expectations of SHIP/SMP Volunteer Team Members, and broadly describe what Volunteers may expect from SHIP/SMP. Also serves to enhance the quality, effectiveness, and safety of SMP/SHIP services and Team Members.

V. STANDARDS

A. Overview

1. DAAS administers the State Health Insurance Assistance Program (SHIP) by providing funding and direction to the state's Area Agencies on Aging (AAAs).
2. SHIP provides Beneficiaries and Representatives with information, Counseling, and enrollment assistance, which empowers Beneficiaries and Representatives to make informed health insurance decisions that optimize access to care. SHIP also comprises:
 - a. Senior Medicare Patrol (SMP) which provides Outreach and education to Beneficiaries or Representatives to prevent, detect, and report Medicare Fraud, Errors, and Abuse.
 - b. Medicare Improvements for Patients and Providers Act (MIPPA) which provides Beneficiaries with limited income, information and assistance in applying for programs that may reduce their Medicare costs.
3. Services are provided at no cost to the Beneficiary or Representative.
4. All Team Members are considered SHIP Team Members. SHIP Team Members may:
 - a. Provide services for both SHIP and SMP.
 - b. Provide services that are solely for either SHIP or SMP.
 - c. MIPPA services are provided as part of SHIP.
5. SHIP Team Members and Counselors must remain unbiased in any service or assistance provided.

B. Programs and Services

1. SHIP

- a. SHIP provides the following services to Beneficiaries and Representatives:
 - i. Counseling and education on a wide range of Medicare, Medicaid, Medigap, and other health insurance matters including:
 - A. Enrollment in Medicare Parts A, B, C, and D;
 - B. Long term care insurance; and
 - C. Claims and billing problem resolution.

- b. SHIP services are provided to all Beneficiaries and Representatives, with an emphasis on vulnerable populations that are traditionally underserved due to:
 - i. Isolation;
 - ii. Socioeconomic or other factors; and
 - iii. Ethnic, cultural, and language barriers.

2. **SMP**

- a. SMP provides the following services to Beneficiaries and Representatives:
 - i. Outreach, Counseling, and education to prevent and detect suspected Medicare Fraud, Error, and Abuse;
 - ii. Reporting suspected Medicare Fraud, Error, and Abuse to state and federal partners;
 - iii. Assistance with resolving Beneficiary complaints of potential healthcare Fraud in collaboration with state and federal partners; and
 - iv. Counseling, and when needed, serving as consumer advocates to resolve billing disputes and issues.

3. **MIPPA**

- a. MIPPA provides the following services to Beneficiaries and Representatives:
 - i. Education and Counseling about programs that can help Beneficiaries to reduce healthcare costs, including:
 - A. Low-Income Subsidy (LIS) program for Medicare Part D;
 - B. Medicare Savings Plans (MSPs); and
 - C. Medicare Preventive Services.
 - ii. Assistance to Beneficiaries in applying for these programs; and
 - iii. Information related to wellness and disease prevention.
- b. MIPPA services are provided to eligible Beneficiaries, with an emphasis on those who are:
 - i. Low-income with limited resources;
 - ii. Residents of rural areas;

- iii. Members of American Indian, Alaskan Native, and Native Hawaiian communities;
- iv. Individuals with disabilities under age 65; and
- v. Individuals for whom English is not their primary language.

C. Process To Obtain SHIP Services

1. Beneficiaries and/or their Representatives may initiate SHIP services by:
 - a. Visiting a local AAA/Regional SHIP Office;
 - b. Calling the Arizona SHIP Hotline at (800) 432-4040;
 - i. Beneficiaries and/or their Representative will be directed to the appropriate Regional SHIP based on their county of residence.
 - c. Attending a Group or Media Outreach and Education event where Counselors are present; or
 - d. Receiving a referral from a Community Partner Agency, which may include the following:
 - i. The Community Partner Agency initiates contact via phone with the Regional SHIP Office or SHIP Hotline on the Beneficiary or Representative's behalf.
 - A. The Community Partner Agency will arrange a time and date for:
 1. Regional SHIP to call the Beneficiary and/or Representative; or
 2. Beneficiary and/or Representative to be present during a scheduled SHIP Group Outreach and Education event.
2. The Beneficiary and/or their Representative will be screened over the phone or in-person by a SHIP Counselor who will provide assistance based on need.
 - a. The Counselor should complete the Beneficiary Contact Form or directly input information into STARS while speaking with the Beneficiary and/or the Representative to determine the appropriate SHIP/SMP/MIPPA assistance.
 - i. Use of the Beneficiary Contact Form is recommended as it is a tool designed to assist the Counselor with gathering information to:

- A. Identify assistance needed by the Beneficiary and/or Representative; and
 - B. Gather pertinent data for SHIP/SMP.
- ii. Information that is collected via the Beneficiary Contact Form is input into STARS.

D. Roles and Responsibilities

1. State SHIP Office:
- a. Contracts with AAAs to provide Arizona SHIP, SMP, and MIPPA programs and services;
 - b. Conducts grant management activities;
 - c. Develops:
 - i. State SHIP policies;
 - ii. Additional guidance material for Regional SHIPs; and
 - iii. Arizona Volunteer Risk Management Policy Manual (AZVRPM).
 - A. ACL allows flexibility for state SHIP/SMP programs to create policies and procedures that will work best for them, while remaining within the national policy framework provided by the ACL Volunteer Risk and Program Management (VRPM).
 - B. The AZVRPM will contain a comprehensive set of Arizona-specific information added to the ACL VRPM policies, to guide the operation of volunteer programs at Regional SHIP Offices.
 - d. Complies with:
 - i. DAAS policies and procedures;
 - ii. ACL VRPM;
 - iii. AZVRPM; and
 - iv. Any additional guidance developed by ACL and/or the State SHIP Office.
 - e. Monitors Regional SHIPs to ensure compliance with the following:
 - i. Program policies;

- ii. Any additional guidance material provided by the State SHIP Office and/or ACL;
 - iii. Federal regulations; and
 - iv. Quality and effectiveness in program activities and service delivery.
2. Regional SHIP Programs:
- a. Policy and Procedure
 - i. Comply with:
 - A. DAAS Policies;
 - B. ACL VRPM;
 - C. AZVRPM;
 - D. DAAS/AAA Contract and Scope of Work; and
 - E. Any additional guidance developed and provided by the State SHIP Office.
 - ii. Regional SHIP Programs must develop their own policies and procedures, to include the following:
 - a. Incident Reporting and Response;
 - b. Disaster/Emergent Situations Planning; and
 - c. Reporting of concerns regarding:
 - 1. Maltreatment of a child and/or a Vulnerable Adult; and
 - 2. Self-neglect of a Vulnerable Adult.
 - iii. Regional SHIP-developed policies cannot reduce or supersede the authority of those listed in the VRPM, DAAS policy or additional guidance developed and provided by ACL and/or the State SHIP Office.
 - iv. Decisions and actions concerning information not covered under the VRPM or DAAS Policy are determined at the state level by:
 - A. ACL;

- B. State SHIP Coordinator; and
- C. Additional guidance developed and provided by the State SHIP Office.

b. Service Delivery

- i. Establish and maintain a comprehensive and coordinated service delivery system to the public which includes the following:
 - A. Operating a Regional SHIP Hotline;
 - B. Operating a Regional SHIP website which includes:
 - 1. A link or reference/referral to the SHIP and SMP programs and related information on the agency website; and
 - 2. A listing of any Regional SHIP contact information.
 - C. Providing a variety of options for Beneficiary interactions that maintain the confidentiality and privacy of Beneficiaries. These may include:
 - 1. In-person interactions;
 - 2. Telephonic interactions; and
 - 3. Virtual interactions.
 - D. Ensuring accessibility to services by providing Counseling sites throughout the service area;
 - E. Expanding programs to accommodate and meet the needs of persons with disabilities, whether virtually or in-person; and
 - F. Ensuring Group Outreach and Education events and Media Outreach and Education are conducted as outlined in additional guidance provided by the State SHIP Office.

c. Program Management

- i. Develop an annual budget;
- ii. Comply with performance measures for the SHIP, SMP and MIPPA programs, as outlined in section V(I) of this policy;

- iii. Use the national data collection systems STARS and SIRS to collect program data;
- iv. Collect accurate data for assessment, program evaluation and reporting as outlined in section V(I) of this policy;
- v. Submit monthly Regional SHIP reports as outlined in section V(I)(2)(b) of this policy and in additional guidance developed by the State SHIP Office; and
- vi. Ensure a risk assessment is conducted at a minimum of every 3 years; and
 - A. Risk management strategies are developed and implemented as needed, including local procedures to identify, prevent and reduce the incidence and impact of risk.
 - B. Regional SHIPs will comply with additional guidance developed by the State SHIP Office for the development, completion and submission of the risk assessment and risk management strategies.

d. Personnel Management

- i. Hire Regional SHIP Coordinators and Volunteer Coordinators
 - A. The Volunteer Coordinator position may be a full or part-time position, or a shared position assigned along with another position within the agency.
 - B. If the position is designated as part-time, the Volunteer Coordinator's responsibilities should allow for sufficient time to be allocated to Volunteer management standard compliance, as required by ACL.
- ii. Ensure Team Members receive appropriate training to meet the following requirements:
 - a. National training standards;
 - b. Training and certifications to remain active in STARS and SIRS, including training for the use and management of:
 - 1. 1-800-Medicare Unique IDs;
 - 2. Complaint Tracking Module (CTM); and

3. MARx (when applicable).

3. State SHIP Coordinator or designee, with the assistance of the Regional SHIP Coordinator:
- a. Policy and Procedure:
 - i. Comply with:
 - A. DAAS policies and procedures;
 - B. ACL VRPM; and
 - C. AZVRPM;
 - ii. Develop directives, standard work, desk aids and other guidance for implementation of the State SHIP at the regional level.
 - b. Service Delivery
 - i. General oversight of all Regional SHIP services and activities as outlined in section V(D)(2) of this policy and per additional guidance developed by the State SHIP Office.
 - c. General Program Management
 - i. Develop annual goals, objectives, and budget;
 - ii. Ensure accurate and timely reporting for all state and federal reporting requirements;
 - iii. Communicate with federal, state, and local SHIP partners regarding SHIP, SMP, and MIPPA matters as they arise, including:
 - a. Informing Regional SHIP Coordinators of ACL-released training announcements and material.
 - iv. Act as a local spokesperson for the program.
 - d. Personnel Management
 - i. Supervise Counselor Training;
 - ii. Ensure the following training requisites are met:
 - A. All Team Members assigned to SHIP Counseling duties are certified; and

- B. All Team Members who are required to do so, have completed all continuing education requirements.
 - iii. Delegate authority and responsibilities to Team Members as applicable; and
 - iv. Ensure new Team Members have access to:
 - A. STARS and SIRS databases; and
 - B. The SHIP TA and the SMP Resource Center, where new Team Members can access training material.
- 4. Regional Program Coordinator (Regional SHIP Coordinator):
 - a. Policy and Procedure
 - i. Comply with:
 - A. DAAS policies and procedures;
 - B. ACL VRPM;
 - C. AZVRPM; and
 - D. Any directives, standard work, desk aids and other guidance developed by the State SHIP Office.
 - b. Service Delivery and Program Management
 - i. Provide general oversight and implementation of activities of the Regional SHIP program including:
 - A. Program activities outlined in V(D)(2) of this policy;
 - B. Assist the State SHIP Coordinator to implement the duties and responsibilities outlined in V(D)(4) of this policy; and
 - C. Comply with data collection and reporting requirements outlined in V(I) of this policy.
 - c. Personnel Management
 - i. Recruit and manage Team Members;
 - ii. Review ACL-released training and material, as communicated and/or provided by the State SHIP Coordinator;

- iii. Ensure SHIP Team Members:
 - A. Obtain and maintain required training and certifications necessary to perform their specific roles;
 - B. Obtain access to the STARS and SIRS database as applicable to their role; and
 - C. Complete additional ACL-released training and review new material released by ACL, as communicated by the State SHIP Coordinator.
 - iv. Conduct a risk assessment as outlined in V(D)(2)(c)(vi) of this policy at a minimum of every 3 years on the roles, work, and activities of the Team Members and program activities.
 - a. Risk management strategies must be developed and implemented, including local level procedures that identify, prevent, and reduce the incidence and impact of risk; and
 - b. Adhere to guidance material developed by the State SHIP Office for submission of the risk assessment and risk management strategies
5. Volunteer Coordinator:
- a. Policy and Procedure
 - i. Comply with:
 - A. DAAS policies and procedures;
 - B. ACL VRPM;
 - C. AZVRPM; and
 - D. Any directives, standard work, desk aids and other guidance developed by the State SHIP Office.
 - b. Service Delivery and Program Management
 - i. Assist the Regional SHIP Coordinator to:
 - a. Conduct a risk assessment, as outlined in V(D)(2)(c)(vi) of this policy; and

- b. Implement any other activities as directed by the Regional SHIP Coordinator.
 - c. Personnel Management
 - i. Assist the Regional Program Coordinator to coordinate activities of Volunteers as outlined in additional guidance developed by the State SHIP Office, including the following:
 - a. Identify areas of the program which require Volunteer assistance;
 - b. Volunteer recruitment;
 - c. Provide direct personnel management of Volunteers;
 - d. Supervise training of Volunteers; and
 - e. Ensure Volunteer Team Members complete the required training per ACL, necessary to perform their specific roles.
6. All Team Members:
 - a. Comply with:
 - i. DAAS policies and procedures;
 - ii. ACL VRPM;
 - iii. AZVRPM; and
 - iv. Any directives, standard work, desk aids and other guidance developed by the State SHIP Office.
 - b. Complete appropriate and required training as outlined in section V(F) of this policy and as directed by the Regional SHIP Coordinator and/or Volunteer Coordinator;
 - c. Receive direction and supervision from the Regional SHIP Coordinator and/or Volunteer Coordinator;
 - d. Comply with Conflict of Interest requirements as outlined in section V(E) of this policy;
 - e. Maintain confidentiality of information obtained during or as part of the performance of SHIP/SMP duties, as outlined in V(H) of this policy;

- f. Review and/or take updated ACL material, information and training as directed by the Regional SHIP Coordinator and/or Volunteer Coordinator;
 - g. Assist Team Members, as directed by the Volunteer Coordinator and/or Regional SHIP Coordinator.
7. Team Members who are SHIP and/or SMP Counselors:
- a. Provide community or group education, as directed and requested by the Regional SHIP Coordinator and/or Volunteer Coordinator.
 - b. Provide information to seniors about organizations and other entities that provide support services for eligible individuals.
 - c. Counsel Beneficiaries and/or their Representatives regarding SHIP and/or SMP matters, as applicable.
 - d. Assist Beneficiaries to apply for programs which can help to reduce healthcare costs.
8. Non-Counseling Team Members:
- a. Comply with training requirements as directed by the Regional SHIP Coordinator and/or Volunteer Coordinator;
 - b. Provide, as directed by the Regional SHIP Coordinator and/or Volunteer Coordinator:
 - i. Advocacy services; and/or
 - ii. Clerical support.

E. Conflict of Interest (COI)

1. Per ACL Office of Healthcare Information and Counseling (OHIC)'s COI guidance document *Conflict of Interest: Identification, Remedy and Removal*, Regional SHIPs must:
- a. Take reasonable steps to avoid employing or appointing an individual who has an unremedied conflict of interest or who has a member of the immediate family with an unremedied conflict of interest;
 - b. Take reasonable steps to avoid assigning an individual to perform duties which would constitute an unremedied conflict of interest;
 - c. Establish a process for periodic review and identification of conflicts;
 - d. Establish proactive policies and contract language that protect the federal programs' interests; and

- e. Take steps to remove or remedy known conflicts immediately.
2. SHIP/SMP personnel must be impartial, objective, and unbiased in the performance of SHIP/SMP activities.
3. Team Members are prohibited from promoting any personal or business interest while undertaking their SHIP/SMP assignment(s).
4. Regional SHIPs are required to ensure that all personnel engaged in SHIP activities and their Immediate Family Members are free from COI.
5. Regional SHIP Coordinator, in consultation with the State SHIP Coordinator, will attempt to remedy particular COI.
 - a. Regional SHIP Coordinators and the State SHIP Coordinator:
 - i. Should consult guidance provided by the ACL Office of Healthcare Information and Counseling (OHIC), *Conflict of Interest: Identification, Remedy and Removal* when making determinations regarding COI, including identification of and attempts to remedy or remove COI.
 - A. Regional SHIPS may review the examples provided in the ACL/OHIC COI guidance document to determine whether the situation presents a COI, and steps to remedy or remove the COI.
 - ii. Follow any additional guidance (directives, standard work, desk aids and other guidance) developed and provided by the State SHIP Program.
 - b. When a COI cannot be remedied the individual may be removed as a Team Member from the SHIP/SMP program as outlined in Regional SHIP policies and procedures and/or additional guidance developed by the State SHIP Office.
6. COI may occur at any time during the course of duties performed for the SHIP program.
 - a. If a COI arises during the time of employment or Volunteer status for the SHIP program the Team Members must immediately report the COI or potential COI to their supervisor (Regional SHIP Coordinator or Volunteer Coordinator).
7. Team Members who have a COI, or who have an Immediate Family Member who has a COI in connection with the work the Team Member does at the SHIP/SMP, whether personal, philosophical or financial, are prohibited to work for the SHIP program.

- a. An individual or an individual with an Immediate Family Member who meets any of the following conditions, is not permitted to act as a Team Member for the SHIP Program:
 - i. Sells insurance;
 - ii. Has an active insurance license; or
 - iii. Receives Gifts, compensation, or other financial gain from insurers, financial or investment planners.

- 8. Individuals retired from the insurance field may serve as SHIP Team Members.
 - a. There is no required timeframe for an individual to have separated from work in the insurance industry prior to becoming a SHIP/SMP Team Member.
 - i. Any individual who was previously in the insurance field must not have an active insurance license in order to be accepted as a SHIP/SMP Team Member.
 - A. Any individual with an active insurance agent/broker license is prohibited from serving as a SHIP/SMP Team Member.
 - b. Regional SHIPs must make a determination about whether the individual can remain unbiased in their SHIP/SMP/MIPPA duties by following the guidance outlined in (V)(E) of this policy.

- 9. Team Members who are relatives or friends of Beneficiaries.
 - a. Team Members are prohibited from assisting, in an official capacity for SHIP/SMP, Immediate Family Members and extended family members, including in-laws, and other individuals they have a personal relationship with such as a friend.
 - b. Beneficiaries and Representatives of Beneficiaries who are friends, immediate or extended family of SHIP/SMP Team Members may receive SHIP/SMP/MIPPA services but must receive them through another Team Member with whom they do not have a personal relationship.

F. Training Requirements

- 1. All Team Members, including those that only provide SMP service, must complete the SHIP training outlined in V(F)(4) to:
 - a. Understand Medicare rules and processes to fully assist Beneficiaries with any SHIP issues; and

- b. Have a basic understanding of the SMP program to recognize and refer instances of Fraud, Error, and Abuse.
- 2. All Team Members who provide SMP services are also required to complete the SMP training outlined in V(F)(4).
- 3. SHIP Training:
 - a. All Team Members must complete the following SHIP training prior to any SHIP activities or tasks being assigned to them:
 - i. Minimum of 30 hours of initial SHIP training utilizing the SHIP TA Center Online Counselor Certification Training (OCCT) Module;
 - ii. SMP Foundations Course and assessment using the TRAX Training Tracker from the SMP Resource Center;
 - iii. Role specific training in STARS for data collection and/or entry; and
 - iv. Confidentiality training.
 - b. Assessments
 - i. Team Members must obtain a minimum score of 80 on the following assessments:
 - A. OCCT Training Final Assessment; and
 - B. SMP Foundations Assessment.
 - ii. Team Members who fail to pass either exam with the required score may retake the exam as often as needed at the discretion of the Regional SHIP Coordinator.
 - c. Additional Required and/or Special Training:
 - i. On-the-job training
 - A. All Team Members must receive specific on-the-job training which provides information and skills necessary to perform their assigned role.
 - ii. Safety Training:
 - A. All Team Members will be:
 - 1. Provided with training to inform to foreseeable hazardous aspects, materials, equipment, or

processes which may be encountered while performing SHIP/SMP duties; and

2. Trained and equipped in methods to deal with all identified risks.

iii. Particular roles may require additional training such as:

A. CMS Unique ID requirements and usage;

B. Data capture for Part D savings;

C. SMP Complex Interactions and data collection; and

D. Team Member management in STARS and SIRS.

iv. Regional SHIPs will ensure that all Team Members, including Regional SHIP Coordinators, complete any additional training required by:

A. ACL; and/or

B. As outlined in additional guidance provided by the State SHIP Office.

d. Continuing Education

i. Annual confidentiality training and signing of a confidentiality agreement;

A. The confidentiality training is accessed and completed through the On-line Occupational Certification Training (OCCT), located in the STARS database.

ii. Minimum of 10 hours of in-service training per year on related topics using any of the resources outlined in additional guidance developed by the State SHIP Office.

iii. SHIP Counselors must participate in at least 1 out-of-service training annually as outlined in additional guidance developed by the State SHIP Office.

4. SMP Training:

a. All SMP Team Members must complete a minimum of 20 hours of initial SMP training using the SMP Resource Center's TRAX Training Tracker, prior to any SMP interactions or activities within the Regional SHIP program.

- b. All certified SMP Team Members must complete an additional 4 hours annually of in-service training relative to their role as outlined in standard work and/or any additional guidance developed and provided by the State SHIP Office.
5. MIPPA
 - a. Information pertaining to the MIPPA program and related services is included in the SHIP and SMP training curriculum.
6. Credit for related training:
 - a. At the discretion of the State SHIP Coordinator, credit may be given for training received from another organization that overlaps with the training provided by the SHIP/SMP.
7. Regional SHIPS must maintain a record of all training taken by each Team Member.

G. Systems, Software and Technology

1. All Team Members must:
 - a. Be entered into the STARS database; and
 - b. Have an active profile in the SHIPTA Center (<https://shiphelp.org>).
2. Team Members who are also SMP Team Members must:
 - a. Be entered into the SIRS database;
 - b. Have an active profile in the SMP Resource Center (<https://smpresource.org>); and
 - c. Paid Team Members who participate in SMP activities, specifically SMP Complex Interactions, must have a CMS Unique ID and follow rules and regulations for Unique IDs as determined by ACL.
3. Resources for all processes and procedures relative to SHIP and SMP activities may be found within SHIP TA (<https://shiphelp.org>) and the SMP Resource Center (<https://smpresource.org>).

H. Privacy, Confidentiality and Disclosure

1. Privacy and Location of Counseling Services
 - a. In-person Counseling with Beneficiaries must primarily occur at accessible public Regional SHIP locations.

- b. SHIP Counselors may meet off-site with Beneficiaries unable to travel to the Regional SHIP with prior approval by the Volunteer Coordinator or Regional SHIP Coordinator.
 - c. Any off-site Counseling activities, including virtual Counseling services must maintain the privacy of the Beneficiary.
- 2. Protection and release of Confidential Information
 - a. The transmission of Personally Identifiable Information (PII) and Protected Health Information (PHI) for any Beneficiary must be transmitted using secure means such as encryption to ensure the information is not accessed by unauthorized individuals.
- 3. Address Confidentiality Program
 - a. DES Employees and Contractors must refer to the DES Address Confidentiality Program (ACP) Policy and the DAAS ACP Policy if a Beneficiary or their Representative states that they are a participant in the Address Confidentiality Program.
 - b. If the Beneficiary or Representative is an ACP Participant, the substitute address must be accepted on all application material required for the SHIP/SMP program.
- 4. All Team Members are required to annually:
 - a. Complete the confidentiality training as outlined in V(F)(4)(d)(i)(A) of this policy; and
 - b. Sign a confidentiality agreement per ACL requirements.
- 5. Records and information collected by the program are maintained as confidential under A.R.S. §41-1959. This includes:
 - a. Beneficiary and Representative information;
 - b. Team Member records; and
 - c. Information collected during an appeal.
- 6. Records and information maintained as confidential must not be released except as authorized under A.R.S. §41-1959.

I. Program Performance Measures, Data, and Reporting

- 1. Regional SHIPs must assess effectiveness of program activities by:
 - a. Developing formal program monitoring processes; and

- b. Implementing the following:
 - i. Beneficiary satisfaction evaluation activities for services conducted at the individual Beneficiary level; and
 - ii. Group Outreach and Education events.
- 2. Regional SHIPs must:
 - a. Comply with state and federal data collection and reporting requirements.
 - i. Frequency, timing and content requirements are outlined in the ACL notice of grant awards for SHIP, SMP and MIPPA.
 - ii. Information pertaining to data collection and reporting for SHIP and SMP are also available through:
 - A. SHIP TA Center, for the SHIP program;
 - B. SMP Resource Center, for the SMP program; and
 - C. Additional guidance developed by the state SHIP office.
 - b. Submit:
 - i. Monthly reports to the State SHIP Program.
 - A. Report is submitted to the State SHIP Coordinator.
 - ii. Additional reports requested by the State SHIP Coordinator.
 - c. Participate in the following:
 - i. ACL Beneficiary Satisfaction Survey project;
 - ii. Monthly statewide conference calls held by the State SHIP Coordinator;
 - A. A designee may attend the meeting in lieu of the Regional SHIP Coordinator.
 - iii. Monthly Regional SHIP CMS Unique ID Confirmation.
 - A. Regional SHIP Coordinators will provide CMS Unique ID status verification for all individuals within their organization, to the State SHIP Coordinator.
 - d. Collect data for the following, as specified by the SHIP/SMP/MIPPA ACL notice of grant awards and as outlined in additional guidance developed by the state SHIP office:

- i. Beneficiary Interactions;
- ii. Group Outreach and Education;
- iii. Media Outreach and Education;
- iv. Team Members;
- v. Team Member Activities;
- vi. General Data Entry; and
- vii. Regional SHIP Coordinator monthly narrative report:
 - A. Due to the State SHIP Coordinator by the 15th of the following month.
 - B. Information that must be included in the report is outlined in additional guidance developed by the state SHIP office.
- e. Data must be entered into the appropriate system(s) within 30 days of activity.

3. Regional SHIP Coordinators must review monthly Regional SHIP performance reports to:

- a. Ensure data:
 - i. Is entered timely and correctly; and
 - ii. Accurately reflects activities performed by the Regional SHIP.
- b. Identify strategies and processes to increase favorable outcomes from interactions and Outreach;
- c. Identify areas that may require additional training among staff and Volunteers;
- d. Develop plans to implement any needed changes.

J. Program File Management and Retention

1. Records Management

- a. Regional SHIPs may maintain program records in paper or electronic format.

- b. All records, regardless of their format, must be maintained in a secure manner to protect the contents from breach, theft, or misuse. This includes:
 - i. Maintaining paper documentation in locked files; and
 - ii. Securing electronic records.

2. Record Retention

- a. The State SHIP Office and Regional SHIP must maintain a copy of all program records for at least 5 years.

K. Complaints, Grievances and Appeals

1. Each Regional SHIP will develop a process to:

- a. Investigate and resolve complaints from Beneficiaries and other outside parties against Team Members per DAAS Policy Chapter 1900 - Administrative Mandates - Section 1920 Client Complaint, Administrative Review and Appeals.