

North Coast Health Certified Application Counselor Program

Privacy Statement – Effective 12/1/2013

In order to provide the Certified Application Counselor (CAC) assistance to members of our community, including facilitating enrollment in qualified health plans (QHPs) through the Health Insurance Marketplace, North Coast Health) may gain access to your personally identifiable information (PII). PII is any information that can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc., alone or when combined with other personal or identifying information that is linked or likable to the specific individual, such as date and place of birth, mother's maiden name, etc.

This Privacy Statement describes how we will maintain any PII that North Coast Health and its Certified Application Counselors may access through the assistance provided to you under the Certified Application Counselor Program.

I. BACKGROUND TO HELP YOU UNDERSTAND THIS PRIVACY NOTIFICATION

What is the Health Insurance Marketplace? The Health Insurance Marketplace (Marketplace) is an online resource where you can learn about your health coverage options, compare health insurance plans based on costs and benefits, choose a plan and enroll in health coverage. The insurance plans offered in the Marketplace are called Qualified Health Plans (QHPs). The Marketplace also provides information on (1) programs that can help you pay for coverage, including ways to save on monthly previous and out-of-pocket costs and (2) programs such as Medicaid and the Children's Health Insurance Program (Insurance Affordability Programs).

What is the Certified Application Counselor Program? The Certified Application Counselor program provides trained and certified counselors to help you understand your health coverage options and enroll. This assistance is provided free of charge. North Coast Health has been certified as a Certified Application Counselor Designated Organization (CDO) to help you apply for health insurance coverage through the Marketplace.

As a CDO, North Coast Health has volunteered to provide designated individuals—known as Certified Application Counselors—to help you make an informed decision during the Marketplace health insurance eligibility and enrollment process. All our Certified Application Counselors have completed the required training, and have agreed to comply with privacy and security laws and all other program standards.

What are the Duties of the Certified Application Counselors? Certified Application Counselors are trained and certified to provide the following assistance to you (CAC Assistance):

- Inform you and/or your authorized representative about the full range of Marketplace Health coverage options and Insurance Affordability Programs for which you are eligible.
- Help you complete your application for health insurance coverage in a QHP through the Marketplace and for Insurance Affordability Programs.
- Help facilitate your enrollment in QHPs and Insurance Affordability Program.

Certified Application Counselors must act in your best interest and inform you of any possible conflicts of interest they might have. They cannot choose a health insurance plan for you. Certified Application Counselors will follow privacy and security information standards when they access (visually, verbally or otherwise) or maintain your PII.

More information about the role of a Certified Application Counselor will be provided to you on an authorization form (Authorization Form) that you must sign to allow a Certified Application Counselor to assist you.

II. PRIVACY NOTIFICATIONS REQUIRED BY 45 CFR 155.260

What is PII? PII is a type of information that can be used to determine your identity. Some examples of PII include:

- Name
- Social Security Number
- Date and place of birth
- Mother's maiden name
- Medication, educational, financial and/or employment information
- Phone number
- Home address
- Driver's license number

Legal Authority to Gain Access to PII. We are authorized to access your PII pursuant to the Affordable Care Act and its implementing rules and regulations published by the Department of Health and Human Services (HHS).

Will Certified Application Counselors Collect my PII? Our Certified Application Counselors will NOT maintain or store any of your PII and/or the PII of your authorized representative, other than the Authorization Form you will be required to sign before a Certified Application Counselor will assist you. The only PII contained on the Authorization Form will be your name and signature, and should you choose to provide it, your phone number and email address.

Although the only PII our Certified Application Counselors will collect and maintain is your Authorization Form, our Certified Application Counselors may discuss or come in contact with your PII when assisting you.

Why Will Certified Application Counselors Come in Contact with my PII? While assisting you, our Certified Application Counselors may come in contact with your PII to:

- Help you with the eligibility process and application for health coverage
- Assist you with enrolling in a QHP
- Help you with an application for an exemption from the individual responsibility requirement

North Coast Health's Certified Application Counselors will not retain your PII (other than your Authorization Form) after your session with the Certified Application Counselor has ended.

Our Certified Application Counselors will be sitting with you and communicating with you while you enter information into the Marketplace's secure web site. The Marketplace will be collecting, maintaining and storing your PII to determine your eligibility of health insurance coverage, to determine your eligibility for programs to lower costs of health coverage and to display your QHP options. The Marketplace has privacy and security standards in place to protect your PII. For information regarding how the Marketplace will use your PII and its privacy and security practices, please see its privacy statement at: <https://www.healthcare.gov/individual-privacy-act-statement/>. You can learn more about how the Marketplace handles your information at: <https://www.healthcare.gov/how-we-use-your-data>.

Will the Certified Application Counselor Share or Disclose My PII? The Certified Application Counselor will not share or retain your PII (other than your Authorization Form).

Is the CAC Program Voluntary? Yes. You and/or your authorized representative don't have to give the Certified Application Counselor more information than you or your authorized representative choose to provide. The assistance the CAC provides is based only on the information you and/or your authorized representative provide. If the information provided is inaccurate or incomplete, the CAC may not be able to provide all the assistance available for your situation. Please see the Marketplace's privacy notice for more information regarding effects of entering incomplete, inaccurate or fraudulent information into the Marketplace application: <https://www.healthcare.gov/individual-privacy-act-statement/>

III. CHANGES TO THIS NOTICE

We reserve the right to change this Notice. We reserve the right to make the revised or changed notice effective with respect to your PII we already have as well as information we may obtain from you if you seek the assistance of the Certified Application Counselor program in the future. We will post a copy of our current Notice on our web site. The Notice will contain the effective date.

IV. HOW TO FILE COMPLAINTS WITH CMS

If you believe your privacy rights have been violated, you may file a complaint with us by calling 216-228-7878 ext. 122 or with CMS by calling the Marketplace help line (1-800-318-2596).