



Y3 Non-Competing Continuation Application

COOPERATIVE AGREEMENT TO SUPPORT NAVIGATORS IN FEDERALLY-FACILITATED AND STATE PARTNERSHIP EXCHANGES

Y3 Non-Competing Continuation Application | Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Exchanges

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Application for Federal Assistance SF-424

Version 02

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify) <input type="text"/>
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* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>
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5a. Federal Entity Identifier: <input type="text"/>	* 5b. Federal Award Identifier: NAVCA150244
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State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
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8. APPLICANT INFORMATION:

* a. Legal Name:

* b. Employer/Taxpayer Identification Number (EIN/TIN): 1596000800A2	* c. Organizational DUNS: 055200216
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d. Address:

* Street1:
Street2:
* City:
County:
* State:
Province:
* Country:
* Zip / Postal Code:

e. Organizational Unit:

Department Name: <input type="text"/>	Division Name: <input type="text"/>
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f. Name and contact information of person to be contacted on matters involving this application:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

Title:

Organizational Affiliation:

* Telephone Number: Fax Number:

* Email:

Application for Federal Assistance SF-424

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9. Type of Applicant 1: Select Applicant Type:

Other (specify)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

Local Government

*** 10. Name of Federal Agency:**

-Consumer Assistance

11. Catalog of Federal Domestic Assistance Number:

93.332

CFDA Title:

Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Marketplaces

*** 12. Funding Opportunity Number:**

Not Applicable

* Title:

Not Applicable

13. Competition Identification Number:

Not Applicable

Title:

Not Applicable

14. Areas Affected by Project (Cities, Counties, States, etc.):

*** 15. Descriptive Title of Applicant's Project:**

Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Marketplaces

Attach supporting documents as specified in agency instructions.

Application for Federal Assistance SF-424

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16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="580000"/>
* b. Applicant	<input type="text" value="0"/>
* c. State	<input type="text" value="0"/>
* d. Local	<input type="text" value="0"/>
* e. Other	<input type="text" value="86271"/>
* f. Program Income	<input type="text" value="0"/>
* g. TOTAL	<input type="text" value="666271"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

- Yes No

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed:

Application for Federal Assistance SF-424

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*** Applicant Federal Debt Delinquency Explanation**

The following field should contain an explanation if the Applicant organization is delinquent on any Federal Debt. Maximum number of characters that can be entered is 4,000. Try and avoid extra spaces and carriage returns to maximize the availability of space.

SECTION C - NON-FEDERAL RESOURCES

(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8 Support Navigators			\$86,271.00	\$86,271.00
9 Support Navigators				
10 Support Navigators				
11 Support Navigators				
12 TOTAL (sum of lines 8-11)			\$86,271.00	\$86,271.00

SECTION D - FORECASTED CASH NEEDS

	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$580,000.00	\$145,000.00	\$145,000.00	\$145,000.00	\$145,000.00
14. Non-Federal	\$86,271.00	\$21,567.75	\$21,567.75	\$21,567.75	\$21,567.75
15. TOTAL (sum of lines 13 and 14)	\$666,271.00	\$166,567.75	\$166,567.75	\$166,567.75	\$166,567.75

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT

(a) Grant Program	FUTURE FUNDING PERIODS (Years)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16. Support Navigators				
17. Support Navigators				
18. Support Navigators				
19. Support Navigators				
20. TOTAL (sum of lines 16-19)				

SECTION F - OTHER BUDGET INFORMATION

21. Direct Charges:	22. Indirect Charges:
23. Remarks:	

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681- 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327- 333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93- 205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<p>* SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> <p>Mark Woodard</p>	<p>* TITLE</p> <p>County Administrator</p>
<p>* APPLICATION ORGANIZATION</p> <p>Pinellas County Board of County Commissioners</p>	<p>* DATE SUBMITTED</p> <p>Not Submitted</p>

Project Abstract Summary

Program Announcement (CFDA)

*** Program Announcement (Funding Opportunity Number)**

*** Closing Date**

*** Applicant Name**

Pinellas County Board of County Commissioners

*** Length of Proposed Project: 37**

Application Control No.

Federal Share Requested (for each year)

*** Federal Share 1st Year**

\$ 580,000.00

*** Federal Share 2nd Year**

\$ 0.00

*** Federal Share 3rd Year**

\$ 0.00

*** Federal Share 4th Year**

\$ 0.00

*** Federal Share 5th Year**

\$ 0.00

Non-Federal Share Requested (for each year)

*** Non-Federal Share 1st Year**

\$ 86,271.00

*** Non-Federal Share 2nd Year**

\$ 0.00

*** Non-Federal Share 3rd Year**

\$ 0.00

*** Non-Federal Share 4th Year**

\$ 0.00

*** Non-Federal Share 5th Year**

\$ 0.00

*** Project Title**

Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Marketplaces

Project Abstract Summary

* Project Summary

The applicant, Pinellas County Board of County Commissioners, serves as the lead agency for Pinellas County for the Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Marketplaces opportunity. The Year three (Y3) award of the Cooperative Agreement will allow the project to continue to offer accessible, comprehensive health exchange information and (re)enrollment into health plans that meet the community's need. Pinellas County Human Services has established a structure and plan for overseeing implementation of the Cooperative Agreement in compliance with the Navigators duties identified in 45 CFR 155.210 and 45 CFR 155.215 and summarized as follows:

- Maintaining a physical presence in the Marketplace Service Area
- Conducting public education activities to raise awareness about the Marketplace
- Facilitating the selection of a qualified health plan
- Providing information in a manner that is culturally and linguistically appropriate to the population served by the Marketplace, including individuals with limited English Proficiency and that is accessible to individuals with disabilities.
- Complying with applicable training and conflict of interest standards
- Obtaining authorization of applicants for coverage prior to accessing their PII

The Y3 total budget is \$666,271. Funding will be used to re-hire the 11 Navigators contracted during the previous year, purchase supplies and conduct marketing outreach.

There are approximately 3.5 million uninsured residents in the State of Florida with approximately 156,534 uninsured residents in Pinellas County. Pinellas County will continue to serve all individuals and families within the County's geographic service area. The County intends to target areas with higher concentrations of uninsured or underinsured residents, Medically Underserved Populations (MUP) areas, and communities with a high concentration of the population living at or below 100% of the Federal Poverty Level (FPL). The y3 goals are to provide education, information, selection, and enrollment programs to residents in a manner that sensitive to cultural, linguistic, physical, mental, and educational differences. It is estimated that 600,000 consumers will be reached through outreach and education events, 5,500 consumers will have one-on-one interactions with Navigators and 800 will be assisted with the selecting/enrolling in a QHP. Participants will be able obtain services at 13 access points throughout the County. Navigators will assist individuals with limited English proficiency and services will be made accessible to individuals with physical disabilities. All service centers are ADA compliant and accessible to individuals with physical disabilities. Navigator staff will make every effort to provide any additional reasonable accommodations when possible to support individuals with disabilities. Through collaborative efforts, a solid workplan, intensive training for the Navigators, and a strong marketing campaign, Pinellas County has the optimum capability for success.

* Estimated number of people to be served as a result of the award of this grant.: 5500

Pinellas County Board of County Commissioners

Project Abstract

The applicant, Pinellas County Board of County Commissioners, serves as the lead agency for Pinellas County for the Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Marketplaces opportunity. The Year 3 (Y3) award of the Cooperative Agreement will allow the Project to continue to offer accessible, comprehensive health exchange information and (re)enrollment into health plans that meet the community's need.

Pinellas County Human Services has established a structure and plan for overseeing implementation of the Cooperative Agreement in compliance with the Navigators duties identified in 45 CFR 155.210 and 45 CFR 155.215 and summarized as follows:

- Maintaining a physical presence in the Marketplace Service Area
- Conducting public education activities to raise awareness about the Marketplace
- Facilitating the selection of a Qualified Health Plan
- Providing information in a manner that is culturally and linguistically appropriate to the population served by the Marketplace, including individuals with limited English Proficiency and that is accessible to individuals with disabilities
- Complying with applicable training and conflict of interest standards
- Obtaining authorization of applicants for coverage prior to accessing their PII

The Y3 budget is \$666,271. Funding will be used to re-hire the 11 Navigators contracted during the first year, purchase supplies and conduct marketing outreach. Five of the 11 Navigators are bilingual speaking Spanish and Haitian French/Creole.

There are approximately 3.5 million uninsured residents in the State of Florida with approximately 156,534 uninsured residents in Pinellas County. Pinellas County will continue to serve all individuals and families within the County's geographic service area. The County intends to target areas with higher concentrations of uninsured or underinsured residents, Medically Underserved Populations (MUP) areas, and communities with a high concentration of the population living at or below 100% of the Federal Poverty Level (FPL).

The Y3 goals are to provide education, information, selection, and (re)enrollment services for Qualified Health Plans (QHP) or other Federal/State/Local healthcare programs to residents in a manner that is sensitive to cultural, linguistic, physical, mental, and educational differences. It is estimated that 600,000 consumers will be reached through outreach and education events, 5,500 consumers will have one-on-one interactions with Navigators and 800 will be assisted with the selecting/enrolling in a QHP.

Participants will be able to obtain services at 13 access points throughout the County. Navigators will assist individuals with limited English proficiency have made services accessible to individuals with disabilities. All service centers are ADA compliant and accessible to individuals with physical disabilities. Navigator staff will make every effort to provide any additional reasonable accommodations when possible to support individuals with disabilities.

Through collaborative efforts, a solid workplan, intensive training for the Navigators, and a strong marketing campaign, Pinellas County has the optimum capability for success.

Pinellas County Board of County Commissioners

Project Goals 2017-2018

Pinellas County Project Goals for the 2017-18 Budget Period

- ❖ Number of Active Navigator Staff to be federally trained and certified/re-certified by October 1, 2017: 11 staff to remain active throughout budget year.
- ❖ Number of Bilingual: 5, 4- Spanish, 1-Haitian Creole/French
- ❖ Number of consumers to be enrolled/reenrolled in a QHP **during OE 5 only (11/1-12/15/17)**: 600
- ❖ Number of consumers to be enrolled/reenrolled in a QHP with Navigator assistance during the entire 2017-2018 budget period (including OE 5): 800
- ❖ Number of consumers referred to Medicaid/CHIP **during OE 5 only (11/1-12/15/17)**: 30
- ❖ Number of consumers referred to Medicaid/CHIP during the entire 2017-2018 budget period (including OE 5): 100
- ❖ Number of consumers expected to be reached through marketing and promotion activities, as reported in Assist Connect, **during OE 5 only (11/1-12/15/17)**: 200,000
- ❖ Number of consumers reached through marketing and promotion activities, as reported in Assist Connect during the entire 2017-2018 budget period (including OE 5): 600,000
- ❖ Number of 1:1 consumer interactions (including both general and specific inquiries) with consumers as reported in HIOS: 5500
- ❖ Number of 1:1 consumer interactions where Navigators assisted consumers w understanding and using their health insurance (HIOS ques- health insurance literacy, locating providers, and billing and payment questions): 2500
- ❖ Number of 1:1 consumer interactions where Navigators assisted consumers with complex cases (HIOS ques- data matching issues (DMI)/periodic data matching (PDM) issues, SEP eligibility, employers sponsored coverage issues, APTC/CSR assistance): 225

Pinellas County Board of County Commissioners

2017-2018 Project Narrative

Description of the Community(ies) or Group(s) the Grantee Expects to Serve:

Target Population:

As originally proposed, Pinellas County, through its Human Services Department (HS), will continue to serve all individuals and families within the County's geographic service area. The County intends to target areas of the County with higher concentrations of uninsured or underinsured residents, Medically Underserved Populations (MUP) areas, and communities with a high concentration of the population living at or below 100% of the Federal Poverty Level (FPL).

Reaching the Target Population:

While Navigators will assist any individual with their (re)enrollment needs, HS intends to strategically locate staff in communities with the greatest need and utilize a robust marketing and community outreach plan to reach the target population.

Based on locations most easily accessible by consumers from the previous years, consumers will be assisted at thirteen (13) sites throughout the County. Eight (8) full-time sites will be located at the HS offices and Pinellas County Department of Health locations. Five (5) additional sites include neighborhood/community centers in these targeted low-income communities that will be utilized for direct assistance during open enrollment periods and by appointment the rest of the year. While these sites are not geographically distant from our existing full time sites, supporting them part time allows us to reach a broader demographic.

For the upcoming project period, the County developed a pro-active outreach and marketing plan that 1) raises awareness about navigational services and where interested consumers can receive assistance; 2) specifically reaches out to community organizations, schools, colleges, nonprofit agencies, business groups, and other stakeholders in the targeted areas.

County's Ability to Serve Target Population:

Pinellas County has over 50 years' experience in serving the uninsured, underserved, vulnerable, and special needs population. Over the past three years, Navigators have become very familiar with the issues and barriers that this population faces.

The County provides a robust and comprehensive diversity training program for its Navigators. All Navigators received cultural and linguistic training that focuses on best practices for sensitivity, diversity and language barrier access. We will be holding a refresher of the "Bridges Out of Poverty" training that was originally given in 2015. This training makes staff aware of and sensitive to the myriad of factors that affect a consumer's needs and the way in which they

Pinellas County Board of County Commissioners | 2017-2018 Project Narrative

may conceptualize health and healthcare. In all cases, the Pinellas County Navigators have been taught to listen to every consumer's individual needs regarding healthcare before assisting them in understanding their plan options.

The County adheres to CLAS standards for printed educational materials as well as the contracting of bilingual Navigators from diverse cultural backgrounds. Current Pinellas County Navigators are fluent in all of the predominant languages in our community including: Spanish, Haitian Creole and French. The County intends to renew contracts with these Navigators. We employ a total of 11 navigators, including the Program Coordinator and Program Analyst, five of whom are bilingual, four Spanish and one Haitian Creole/French. In addition, the Navigators are trained to assist consumers with access to translators through Healthcare.gov.

The geographical placement of our Navigator staff was strategically assigned to gain the highest value relative to language skills for our consumers throughout the community and is reviewed quarterly.

Scope of Activities for the 2017-2018 Budget Period

Plan for Carrying Out Navigator Duties:

Pinellas County Human Services has established a structure and plan for overseeing implementation of the Cooperative Agreement in compliance with the Navigators duties identified in 45 CFR 155.210 and 45 CFR 155.215 and summarized as follows and detailed further in the narrative below:

- Maintaining a physical presence in the Marketplace Service Area
- Conducting public education and outreach activities to raise awareness about the Marketplace
- Fostering 1:1 interactions with consumers
- Facilitating the selection of a Qualified Health Plan
- Providing information in a manner that is culturally and linguistically appropriate to the population served by the Marketplace, including individuals with limited English Proficiency and that is accessible to individuals with disabilities
- Complying with applicable training and conflict of interest standards
- Obtaining authorization of applicants for coverage prior to accessing their PII

HS will provide a Project Manager to oversee all aspects of the program. The Project Manager's responsibilities include managing the Cooperative Agreement and handling any associated requirements, facilitating meetings with stakeholders for strategic planning, developing the work plan and timeline, hiring staff, ensuring that certification and training is completed by all

Pinellas County Board of County Commissioners | 2017-2018 Project Narrative

navigators and volunteers, implementing marketing and outreach strategies, and ongoing monitoring of and reporting for the Cooperative Agreement.

Servicing the target area & maintaining a physical presence:

Pinellas County proposes to serve all individuals and families within the County's geographic service area. HS has identified several communities with a higher concentration of uninsured or underinsured residents. While Navigators will assist any individual with their enrollment needs, HS intends to strategically locate staff in communities with the greatest need.

Pinellas County, through its previous recent Cooperative Agreements with CMS, has identified 13 sites throughout the county where the locations are most easily accessible by consumers and consumers can receive in-person, face-to-face assistance. Eight full-time sites will be located at the HS offices and Pinellas County Department of Health locations. Five additional sites including neighborhood/community centers in our identified at-risk zones will be utilized for outreach and education events and for navigational services by appointment.

Raising awareness through public education and outreach activities:

All Navigators will be expected to create opportunities for individuals to enroll, and to sponsor and participate in outreach activities. All Navigators will be retrained to conduct public outreach and education presentations raising Marketplace awareness. For the current project period, the County developed a communications and marketing plan that 1) raises awareness about navigational services provided by the County and where interested consumers can receive assistance; 2) proactively reaches out to community organizations, schools, colleges, nonprofit agencies, business groups, and other stakeholders about the Marketplace and Navigator services.

In preparation for the shorter enrollment period for plan year 2018 we plan on starting our increased marketing push earlier in the program year. Navigators will participate in several outreach activities in September and October to increase community awareness of the new open enrollment timeframe, educate consumers on changes to enrollment requirements (i.e. 2017 Market Stabilization Rule), and encourage the scheduling of appointments for November. We will use the Connector scheduling tool to reach back out to consumers who have been assisted in previous open enrollments and encourage their active enrollment.

As a part of the enrollment process we give consumers a blue folder with our contact information along with their account information. We include the Coverage to Care documents and information regarding reporting life changes. The information about life changes includes a list of the types of supporting documentation needed for the Marketplace requirements. We encourage consumers to follow up with us throughout the year with any questions or changes in their situation. During our educational events outside of Open Enrollment we heavily emphasize Special Enrollment Periods and the Coverage to Care materials. As we did in the second budget year, we plan on holding more events leading up to the tax filing season in partnership with

Volunteer Income Tax Assistance (VITA) programs throughout the County. We always encourage consumers to schedule an appointment if they think that they might be eligible for a SEP so that we can assist them in obtaining an eligibility determination from the Marketplace. Part of this process includes helping the consumers gather and upload all of the necessary documentation required to verify their eligibility.

Communications & Marketing Plan

HS will continue to utilize a variety of marketing channels to distribute its message including all the County's communication resources and social media. The marketing campaign will begin in September 2017 and run throughout the project period with varying levels of intensity based on the open enrollment period and levels of enrollment. HS will advertise more heavily in the initial months of the budget year to increase the visibility of the Navigator program and awareness of the new, shorter Open Enrollment period, building on the known presence in the community.

A year round marketing presence will start at the beginning of the grant year with a greater emphasis six weeks prior to the beginning and continuing through the end of Open Enrollment. In previous years we have begun our increased marketing only two weeks prior to open enrollment, but we plan to start earlier to ensure that all of our consumers are aware of the new Open Enrollment time frame. During our annual push we will have 30 second Public Service Announcements in English and Spanish air on local cable networks. Through Charter Communications we will have English ads on Animal Planet, ESPN2, ID Investigation Discovery, MTV, Bay News 9, CMT, VHI, and BET. Through Univision/Unimas we will have Spanish ads on WVEA, WFTT, and EVEA. We will also use Entravision's Pulpo Digital Media platform to reach a larger Spanish language audience.

We will run English language print ads in the Tampa Bay Times newspapers. We will be running additional English and Spanish language print ads in the Tampa Bay Newspapers, a variety of community level papers throughout the County. We will also run a series of PSAs on local popular radio during open enrollment.

We will utilize the County social media accounts on Facebook, Twitter and Instagram to reach our target audiences quickly and extend our reach. Social media posts will be made year round, with heavier promotion during Open Enrollment. These posts will allow us to advertise specific events and activities as well as the overall program and available services. Boosted Twitter posts will be purchased targeting specific events, geographic locations and languages.

The County acknowledges that not all citizens, especially those living in poverty, may have access to cable television and/or social media. Traditional marketing tools including posters and brochures will be updated, printed and distributed in publicly accessible locations, including libraries, schools, health centers, and community partner locations throughout the county. We will utilize our existing relationships with the Pinellas County Library system, Pinellas County

School Board, and Neighborhood Family Centers to display program posters in the community with our service locations and contact information.

Description of Existing Relationships including and Employer/Employee Relationships

HS has strong relationships with various organizations, employers and employees. County staff proactively participates in numerous health coalitions, business groups, churches and community groups in the region that provide homeless and housing services, mental health and substance abuse treatment, legal assistance, nutrition, education, employment and job training services.

In 2015-2017, the County worked extensively with the County Library System for outreach events and distribution of marketing materials. Neighborhood Family Centers throughout the County were instrumental in distribution of materials and communicating with local residents about the available services of Navigators.

The County also worked cooperatively with Covering Tampa Bay, a coalition of Navigator grantees, Certified Application Counselor Organizations and In-Person Assisters in the broader Tampa Bay region. The County plans to continue to build on these relationships in the upcoming grant period.

On a national scale, the County has worked with the local Enroll America outreach team. In this budget year, the County plans on renewing the contract with Enroll America to continue participating in their “Get Covered Connector” outreach and scheduling tool which increases access and ease of making appointments. With Enroll America phasing out of enrollment assistance we will continue to use the Connector as it transitions to maintenance through Young Invincibles. These relationships and the materials developed and provided by these organizations help build the health literacy of individuals with a lack of knowledge of health insurance coverage and cost.

Efforts to establish ongoing linkages throughout the County to sustain outreach and enrollment activities will be addressed through participation in strategic planning meetings with stakeholders that include but are not limited to municipalities, community agencies, colleges, neighborhood associations.

Facilitate the selection of a Qualified Health Plan (QHP)

The County’s Navigators will assess the consumer’s needs and level of understanding. They then will assist the consumer with the application process to receive an eligibility determination through the Marketplace, explain to consumers the health plans and differences between options they are eligible for, and aid participants in fully understanding their health care choices. Navigators or volunteers will explain how Advance Premium Tax Credits and Cost Sharing work if the consumer is eligible and assist clients with resolving any issues or disputes, choosing a Qualified Health Plan, and with activating the eligible coverage. We acknowledge that

Pinellas County Board of County Commissioners | 2017-2018 Project Narrative

Navigators may need additional time to walk through the enrollment process and post enrollment “Coverage to Care” roadmap more thoroughly with individuals living in poverty in the zones. We know that fostering these 1:1 interactions with consumers facilitates their enrollment in health insurance. These 1:1 interactions also allow for assistance with increasing consumers’ health insurance literacy ensuring that they maintain coverage and access their health services.

The County, upon award, will assist approximately 5,500 individuals in the third budget year.

Provide culturally-competent and linguistically appropriate information

Pinellas County provides a robust and comprehensive diversity training program for its Navigators. This training focuses on best practices for sensitivity, diversity and language barrier awareness. We will be refreshing the “Bridges Out of Poverty” training with the Navigator staff. This training makes them aware of and sensitive to the myriad of factors that affect a consumer’s needs and the way in which they may conceptualize health and healthcare. In all cases, the Pinellas County Navigators have been taught to listen to every consumer’s individual needs regarding healthcare before assisting them in understanding their plan options.

The County adheres to CLAS standards for printed educational materials as well as the contracting of bilingual Navigators from diverse cultural backgrounds. Current Pinellas County Navigators are fluent in all of the predominant languages in our community including: Spanish, Haitian Creole and French. We employ a total of eleven navigators, including the Program Coordinator and Program Analyst, five of whom are bilingual, four Spanish and one Haitian Creole/French. In addition, the Navigators are trained to assist consumers with access to translators through Healthcare.gov.

The geographical placement of our Navigator staff was strategically assigned to gain the highest value relative to language skills for our consumers throughout the community and is reviewed quarterly.

Working with individuals - limited English proficiency, disabilities, underserved

County Navigators assist individuals with limited English proficiency, individuals with disabilities, and underserved and vulnerable populations through a variety of programs and services. During the second budget year through May 4th, several bilingual Navigators were contracted with and have assisted 736 individuals whose primary language is one other than English.

Access by persons with disabilities

The County and project partners have made services available and accessible to individuals with disabilities throughout the County. All service centers are ADA compliant and accessible to individuals with physical disabilities. Every navigator location in Pinellas County provides handicapped parking, is wheelchair accessible, and has areas for curb-side drop-offs.

Navigator staff will make every effort to provide any additional reasonable accommodations when possible to support individuals with disabilities. Accommodations may include reconfiguration of the office space, different seating options, assistance using the computer, and/or more time for an appointment as needed and requested by the individual. The County anticipates increasing its targeted, grassroots marketing efforts to reach individuals facing extensive poverty and disabilities.

Conflict of Interest Standards

Persons serving as Pinellas County Health Care Navigators are required to comply with county guidelines and standards adopting the Florida Statutes Section 112 (entitled, Code of Ethics for Public Officers and Employees). State of Florida law also sets guidance for navigators in the Florida Statutes Section 626.995 (entitled, Navigators) et. seq. A copy of the Conflict of Interest Policy is provided to all Navigators upon employment.

Training Standards

Navigators and volunteers will maintain expertise in eligibility, enrollment, and program specifications through a variety of training and compliance monitoring standards. Navigators will attend required trainings including the annual 20 hour HHS training, any training requirements set forth by the State, as well as County identified training in the areas of sensitivity, diversity, and the specific “Bridges Out of Poverty” training. Navigators will be required to participate in continuing education trainings provided and to undergo a period of shadowing/mentorship with an experienced navigator from the lead agency before providing assistance independently.

Pinellas County Board of County Commissioners

Privacy & Security Compliance Summary

Process for Ensuring Compliance with Privacy and Security Standards

Statement Attesting Compliance

Pinellas County Board of County Commissioners, the lead agency for the Cooperative Agreement to Support Navigators in Federally-facilitated and State Partnership Exchanges, has complied with and will continue to comply with the FFM Privacy and Security Standards laid out in the 2015 Terms and Conditions that accompanied our Notice of Award in September 2015.

To date, the County has had no security breaches, or mishandling of consumer PII related to this project. Navigators review the proper procedures for handling consumer PII and discuss different scenarios for handling PII on a monthly basis. All of the consent forms signed by consumers are retained on a secure server at the County. No paper copies are retained by staff.

Navigator Training to Protect Consumer PII

Navigator training addresses the handling of PII or other sensitive data. Navigators do not handle or keep any information that is classified as PII. When working with a consumer, the Navigator allows the consumer to enter all PII data into the computer using the keyboard and mouse for additional confidentiality. Any email correspondence containing PII is safeguarded with encryption to mitigate the risk of information loss. During large enrollment events, the County ensures individual security standards, including privacy screens and partition spaces.

Should a consumer not be able to enter their own personal information due to a disability or low computer skills, the Navigator, with the consumer's consent, will enter the information. The consumer has a full-screen view of the data entered by the Navigator on their behalf for review and consent.

Consumer Awareness, Authorization and Rights regarding Navigator Duties

During the initial meeting between a consumer and a Pinellas County Navigator, the consumer is provided with a consent form covering our privacy policy and etiquette for handling PII, along with a complete description of the Navigator's Roles and Responsibilities. The Navigators functions and responsibilities include, but not limited to, expertise and qualifications in eligibility, enrollment and program specifications of QHPs, their ability to serve individuals in a culturally and linguistically appropriate way, their ability to handle grievances and complaints, privacy rights, and a Navigator's inability to accept a fee, gift, or financial cash incentive. A

Pinellas County | Privacy & Security Compliance Summary

complete list of roles and responsibilities is provided to each individual and can be furnished upon request for this grant application.

A Navigator may orally communicate these roles and responsibilities to individuals with low literacy levels. The consumer must provide authorization, via this consent form, prior to the Navigator obtaining any personally identifiable information. The consumer is also notified that they may revoke the authorizations of the Navigator at any time. Upon completion of navigational services, this consent form is scanned, filed securely and the original is returned to the consumer.

Ensuring Privacy and Security of Consumer PII

Compliance with Security Standards for computers, laptops or tablets

Pinellas County government maintains an Information Security Policy that addresses security standards and applicable use for computers, county networks, and databases. This Policy provides information security instructions applicable to all users (employees and third parties) who use computer systems. All users are expected to comply with this Policy as a condition of continued employment or access to the Enterprise Network. To date the County has had no instances of security breaches associated with this project. Staff actively discusses the standing plan of action, including reporting any violation through the appropriate human resource channels for disposition in accordance with Sections 1411g of the Affordable Care Act.

Background Checks

In order to be retained for employment, candidates must pass two levels of screenings including the employment agency's application process and background check, and the State of Florida background check for registration. The County currently contracts with Randstad, an employment agency, to provide Navigators for the grant awarded in 2013. Randstad contracts with Infomart to run criminal background checks and verify social security accounts. In 2013, the Florida Legislature passed legislation requiring individuals acting as "Navigators" under the ACA to be registered with the Florida Department of Financial Services (DFS). Registration with DFS includes submission of fingerprints for a criminal background check. Certain crimes would either permanently bar an individual from registration or disqualify an applicant for specified periods. An applicant who has committed a felony of the first degree, a capital felony, a felony involving money laundering, fraud, or embezzlement, or a felony directly related to the financial services business is permanently barred from applying for a license. Additional information for applicants with a criminal history seeking to register as a navigator can be found on the DFS website: <http://www.myfloridacfo.com/Division/Agents/Licensure/General/PriorCrimHist.htm>

Finally, the County's Navigator application includes former employment verification and two positive references.

Completion of Required Training and Security/Privacy Compliance

Upon employment, all Navigators begin an annual process to complete 20 hours of training from HHS and become (re)certified and licensed by the State; certifications are mandatory to be able to assist consumers as Navigators. Training related to privacy and security of consumer PII is an important module of the training received.

Evaluating staff qualifications for receiving, securing and handling PII

The employment application and interview process evaluates an individual's qualifications for handling PII data. In addition, all Navigators are mentored and periodically evaluated throughout the year to ensure adherence with PII standards.

Pinellas County Board of County Commissioners

Key Personnel

Navigator Staff Summary

Certified, Trained, Navigator Staff Total.....	11
Full-Time	11
Part-Time	0
Volunteers	0
Bilingual.....	5
(4- Spanish, 1-Haitian Creole/French)	

Key Personnel

Authorized Representative (AOR).....	Mark Woodard, County Administrator
Project Director (PD)	Lisa Freeman
Project Director's Supervisor.....	Daisy Rodriguez, Health Care Administrator
Navigator Program Coordinator/Lead Navigator	Erin Richards
Navigator Program Analyst	Pedro Limas

Pinellas County Board of County Commissioners

2017-2018 Work Plan & Timeline

Goal 1: Complete Navigator Training & Certification and Maintain Expertise of Personnel			
Key Action Steps	Timeline	Expected Outcome	Person/Area Responsible
1.1 Successfully complete all required and applicable federal and/or state consumer assistance training.	September 2017	100% of Navigators including the Program Analyst and Program Coordinator will complete the required trainings and pass the certification test annually.	Program Manager, Lisa Freeman
1.2 Schedule weekly conference calls and quarterly in-person meetings and training, when available, with staff members to review policies, procedures, updates, etc., and to answer any staff questions and concerns	September 2017 – September 2018	All staff attend and have an outlet to share experiences with other Navigators, and can provide direct feedback (positive and negative) to program administrators that can help improve the program and consumer experience.	Program Manager, Lisa Freeman
1.3 All Navigators are expected to review the weekly newsletters and participate in CMS webinars when available.	September 2017 – September 2018	Navigators review the most recent updated information provided by CMS on best practices, policy updates, and frequently asked questions.	Program Coordinator, Erin Richards

Goal 2: Increase Visibility of County Navigator Services			
Key Action Steps	Timeline	Expected Outcome	Person/Area Responsible
2.1 Implement marketing and communications plan and participate in or host outreach and enrollment events.	September 2017 – September 2018	Reach 200,000 consumers through marketing and promotion activities, as reported in Assist Connect, during Open Enrollment November 1, 2017 – December 15, 2017 and a total of 600,000 annually	Program Manager, Lisa Freeman Communications staff Program Coordinator, Erin Richards
2.2 Maintain a physical presence by strategically locating staff in targeted areas of the county where greatest numbers of uninsured may be reached	September 2017 – September 2018	Access to Navigators is within a reasonable distance with the least amount of barriers for those seeking assistance	Program Manager, Lisa Freeman

Goal 3: Provide Navigator Services to Consumers			
Key Action Steps	Timeline	Expected Outcome	Person/Area Responsible
3.1 Perform outreach and enrollment assistance activities	September 2017 – September 2018	Navigators successfully perform all duties outlines for outreach and enrollment assistance activities with one on one consumer interactions (including both general and specific inquiries) to 5500 consumers annually meeting identified goals outlines in the scope of work.	Program Coordinator, Erin Richards Program Analyst, Pedro Limas Navigators
3.2 Assist consumers with enrolling/reenrolling in a Qualified Health Plan (QHP)	September 2017 – September 2018	Navigators will assist 600 consumers with enrolling/reenrolling in a QHP during OE5 (November 1 – December 15, 2017) and a total of 800 annually.	Program Coordinator, Erin Richards Program Analyst, Pedro Limas Navigators
3.3 Provide information in a fair, accurate and impartial manner	September 2017 – September 2018	Services provided are in a manner consistent with the consumers’ needs (cultural and linguistic, disabilities, languages spoken)	Program Coordinator, Erin Richards Program Analyst, Pedro Limas Navigators

Pinellas County Board of County Commissioners | 2015-2018 Work Plan & Timeline

<p>3.4 Provide post-enrollment assistance to consumers enrolled in health care coverage</p>	<p>September 2017 – September 2018</p>	<p>Consumers maintain their coverage and understand how to utilize the available services</p>	<p>Program Coordinator, Erin Richards Program Analyst, Pedro Limas Navigators</p>
<p>3.5 Refer consumers to other benefit programs, when appropriate</p>	<p>September 2017 – September 2018</p>	<p>100% of consumers who do not sign up through the Marketplace for ACA coverage are referred to other benefit programs/services. Among those we expect to refer 30 consumers to the state Medicaid/CHIP office during OE5 and a total of 100 annually.</p>	<p>Program Coordinator, Erin Richards Program Analyst, Pedro Limas Navigators</p>
<p>3.6 Provide assistance to consumers with understanding and using their health insurance (health insurance literacy, locating providers, and billing and payment questions</p>	<p>September 2017 – September 2018</p>	<p>Navigators will provide 1:1 assistance to 2500 consumers annually with understanding and using their health insurance including health insurance literacy, locating providers, and billing and payment questions.</p>	<p>Program Coordinator, Erin Richards Program Analyst, Pedro Limas Navigators</p>
<p>3.7 Provide assistance to consumers with complex cases (data matching issues (DMI)/ periodic data matching (PDM) issues, SEP eligibility, employers sponsored coverage issues, APTC/CSR assistance)</p>	<p>September 2017 – September 2018</p>	<p>Navigators will provide 1:1 assistance to 225 consumers annually with complex cases including data matching issues (DMI)/periodic data matching (PDM) issues, SEP eligibility, employers sponsored coverage issues, and APTC/CSR assistance.</p>	<p>Program Coordinator, Erin Richards Program Analyst, Pedro Limas Navigators</p>

Goal 4: Maximize Program Impact			
Key Action Steps	Timeline	Expected Outcome	Person/Area Responsible
4.1. Evaluate progress and revise strategies as appropriate with emphasis on reaching individuals in the identified target areas of the county with the highest number of uninsured.	October 2017 – September 2018	Targeted areas are being saturated through a comprehensive marketing and outreach plan.	Program Manager, Lisa Freeman Program Coordinator, Erin Richards
Goal 5: CMS is Informed on Grantee Progress through Timely Grant Reporting/Updates			
Key Action Steps	Timeline	Expected Outcome	Person/Area Responsible
5.1. Prepare and Submit Weekly, Monthly, Quarterly, and Annual reporting	September 2017 – September 2018	100% of reports are uploaded to the grants management and HIOS systems on time.	Program Manager, Lisa Freeman Program Coordinator, Erin Richards
5.2. Participate in weekly/bi-weekly conference calls with the Project Officer	September 2017 – September 2018	The County will update the Project Officer regularly of progress to date and incorporate any recommendations.	Program Manager, Lisa Freeman Program Coordinator, Erin Richards

Pinellas County Board of County Commissioners

2017-2018 Budget Narrative

Budget Justification	Year 3			
	Federal	Other Sources		
PERSONNEL – <i>The County contract for temporary personnel to carry out the Navigator duties outlined in the scope of the program.</i>				
Not Applicable	\$0	\$0		
TOTAL PERSONNEL	\$0	\$0		
FRINGE BENEFITS – <i>All Navigator employees are contracted through a third party; therefore no fringe benefits will apply.</i>				
Not Applicable	\$0	\$0		
TOTAL FRINGE	\$0	\$0		
TRAVEL – <i>Travel identified in this budget further the County’s efforts to accomplish specific project goals including facilitating assistance for a larger number of consumers and education. All travel is considered local travel for Navigators to attend local outreach sites from satellite offices and for the Navigator Program Coordinator to travel to sites to monitor program implementation.</i>				
<u>LOCAL TRAVEL</u> <i>2017 mileage reimbursement rate = .535 cents/mile</i>				
Navigator Program Coordinator 150 trips @ 20 miles avg/trip	\$1,605	\$0		
Navigator Program Analyst 100 trips @ 20 miles avg/trip	\$1,070	\$0		

Pinellas County Board of County Commissioners | Budget Narrative

Budget Justification	Year 3			
	Federal	Other Sources		
Navigators 250 trips @ 20 miles avg/trip	\$2,675	\$0		
<u>OUT-OF-STATE TRAVEL</u>	\$1,107	\$0		
CMS Assister Summit – Program Coordinator <i>Understanding the Evolving Marketplace</i> Airfare (\$300 – TIA to BWI) Lodging (\$250/night; 2 nights) Per Diem (\$69/day; 3 days) Ground Transportation (\$100)				
TOTAL TRAVEL	\$6,457	\$0		
EQUIPMENT - <i>The County does not anticipate any equipment purchase for this program.</i>				
Not Applicable	\$0	\$0		
TOTAL EQUIPMENT	\$0	\$0		
SUPPLIES – <i>The County will utilize general office supplies to be used by Navigators to carry out daily activities of the program. Supplies include general office supplies (pens, pencils, paper, etc) and personalized name badges for each Navigator.</i>				
General Office Supplies \$100/yr for use by 11 Navigators	\$1,100	\$0		
Customized Magnetic Name Badges Replacements for 11 Navigators	\$100	\$0		
TOTAL SUPPLIES	\$1,200	\$0		

Pinellas County Board of County Commissioners | Budget Narrative

Budget Justification	Year 3			
	Federal	Other Sources		
CONTRACTUAL¹ – <i>The County contracts with an employment agency, Randstad, to hire temporary staff as needed for any County Department. The Billable Rate includes the base salary plus the 36.3-36.47% fee charged by Randstad and an additional \$.37 per labor hour ACA fee also charged by Randstad. Original 3% base salary annual raise reflected in different Navigator pay structures based upon tenure within the Program.</i>				
Navigator Program Coordinator² 51 wks @ 40 hrs/wk x Billable Rate \$42.29/hr (Base Salary equivalent to GS-12 @ \$30.72/hr)	\$0	\$86,271		
Navigator Program Analyst³ 51 wks @ 40 hrs/wk x Billable rate \$32.18/hr (Base Salary equivalent to GS-9 @ \$23.34/hr)	\$65,647	\$0		
Two (2) First Year Navigators⁴ 18 wks @ 40 hrs/wk x Billable Rate \$27.13/hr 34 wks @ 32 hrs/wk (Base Salary equivalent to GS-8 @ 19.63/hr)	\$39,067 \$59,035	\$0 \$0		
Two (2) Second Year Navigators⁴ 18 wks @ 40 hrs/wk x Billable Rate \$27.93/hr 34 wks @ 32 hrs/wk (Base Salary equivalent to GS-8 @ 20.22/hr)	\$40,219 \$60,776	\$0 \$0		
Five (5) Third Year Navigators⁴ 18 wks @ 40 hrs/wk x Billable Rate \$28.76/hr 34 wks @ 32 hrs/wk (Base Salary equivalent to GS-9 @ 20.83/hr)	\$103,536 \$156,454	\$0 \$0		
TOTAL CONTRACTUAL	\$524,734	\$86,271		

¹ *This contract is secured through the County's Purchasing Ordinance, found in Sections 156-190 of the Pinellas County Code. For the Navigators program, HCS outlines the specific services/tasks to be performed and as outlined in the Navigator's Program Scope of Work and works with the County HR staff to outline the scope for Randstad. Once the scope is outlined and approved, HCS works directly with Randstad on the hiring of the contracted employees. Randstad's Billable Rate includes a 36.3-36.47% fee on the base salary of the contractual staff member plus an additional \$.37 per labor hour ACA fee. Randstad provides background checks on each candidate and manages payroll for the contracted employees. Contractors employed for the Navigator Program are supervised by the Project Manager, a Pinellas County staff member.*

² *The **Program Coordinator** directs the overall operation of the project; responsible for overseeing the implementation of project activities, coordination with other agencies, development of materials, provisions of in-service and training, conducting meetings; designs and directs the gathering, tabulating and interpreting of required data; responsible for overall project evaluation and for staff performance evaluation; and is the responsible authority for ensuring necessary reports/documentation are submitted to CMS/CCIIO. This position relates to all project objectives. Also performs all Navigator functions.*

³ *The **Program Analyst** provides administrative assistance to the Program Coordinator and Program Manager in planning, researching, directing and implementing project efforts for best practices, outcome measurements, funding and budget administration and project planning; technical assistance for staff with all data collection programs and procedures; development of materials. This position relates to all project objectives. Also performs all Navigator functions.*

⁴ ***Navigators** provide outreach, education, and enrollment services to families and individuals eligible for insurance programs through the Marketplace. The Navigator is responsible for meeting projected enrollment goals, coordinating outreach & enrollment efforts by working collaboratively with other staff, member clinics and working with community based organizations. The Navigator also provides ongoing post enrollment assistance utilizing the Coverage to Care materials designed by CMS.*

Pinellas County Board of County Commissioners | Budget Narrative

Budget Justification	Year 3			
	Federal	Other Sources		
<p>OTHER – <i>The County covers the cost to the Navigators to obtain their State of Florida license at \$105pp in addition to a subscription for wireless aircard services that enable Navigators to complete their duties from any location. The remaining expenses in this category are the anticipated marketing expenses for Navigators participate in outreach events, advertising, and creating and printing promotional materials for consumers. Year 3 expenses allowing for possible turnover of trained staff.</i></p>				
<p>Florida State Fingerprinting & Licensing for Navigators <i>\$105 pp x 2 Navigators</i></p>	\$210	\$0		
<p>Monthly Fee and Usage Fees for Aircard Service 11 Navigators over 12 months @ \$366/month</p>	\$4,400	\$0		
<p>Monthly Fee and Usage Fees for Cell Phones 3 Phones over 12 months @ Approx \$82/month</p>	\$984	\$0		
<p>Marketing Plan Expenses: <u>Enroll America: Get Covered Connector Tool</u> Increase awareness and access to in-person assistance. Helps consumers search for help by zip code, review options and schedule an appointment on line, receive notifications and reminders via email and/or text, and access contact info for local assisters.</p>	\$10,000	\$0		
<p><u>BOOTH/REGISTRATION FEES</u> Various Outreach Events</p>	\$500	\$0		

Pinellas County Board of County Commissioners | Budget Narrative

Budget Justification	Year 3			
	Federal	Other Sources		
<u>SOCIAL MEDIA</u> Includes online advertising on Facebook, Twitter, Instagram with posts year round for events, heavily during open enrollment	\$10,000	\$0		
<u>PRINT ADS</u> Advertising in Tampa Bay Newspapers: Beacon, Leader, Bee and in Tampa Bay Times (includes banner ads on TBT website)	\$6,000	\$0		
<u>TELEVISION</u> 30-second PSAs on Charter Communications (Channels Animal Planet, ESPN2, ID Investigation Discovery, MTV, Bay News 9, CMT, VHI, BET) and Univision/Unimas (Channels WVEA, WFTT, EVEA)	\$10,000	\$0		
<u>DIGITAL</u> Entravision’s Pulpo Digital Media platform	\$5,000	\$0		
<u>BROCHURES</u> Tri-Fold, Full Color Brochure (addt’l qty - Y2) English and Spanish Language	\$315	\$0		
<u>POSTERS</u> ACA Posters (additional qty from Y2) English and Spanish Language	\$100	\$0		

Pinellas County Board of County Commissioners | Budget Narrative

Budget Justification	Year 3			
	Federal	Other Sources		
<u>BUSINESS CARDS</u> (additional qty from Y2)	\$100	\$0		
TOTAL OTHER	\$47,609	\$0		
TOTAL DIRECT CHARGES (Sum of all TOTAL Expenses above)	\$580,000	\$86,271		
INDIRECT CHARGES – <i>Include approved indirect cost rate.</i>				
% indirect rate (includes utilities and accounting services)	\$0	\$0		
TOTALS (Total of TOTAL DIRECT CHARGES and INDIRECT CHARGES above)	\$580,000	\$86,271		

Statement of Assurance: Funding from this opportunity will not be used for activities already funded through section 1311(a) of the Affordable Care Act or section 2793 of the Public Health Service Act, including to make payments to other types of Marketplace enrollment and eligibility assisters that are funded through section 1311(a) of the Affordable Care Act or to recipients of funds awarded to State under Consumer Assistance Program grants.

Other Sources: Pinellas County, through its Health Care for the Homeless Program, receives additional funding from the U.S. Department of Health & Human Services, Health Resources and Services Administration (HRSA) for Outreach and Enrollment. This funding is used to pay for the Navigator Coordinator position.

Pinellas County Board of County Commissioners

Business Assessment

A. General Information

1. Does the organization have a Board of Directors with specific functions and responsibilities (by-laws)? *The Board of County Commissioners is the legislative and governing body of Pinellas County. The seven-member commission is responsible for establishing policies to protect the health, safety and general welfare of Pinellas County residents.*

As a local government entity, the State constitution gives the Board of County Commissioners the power to adopt ordinances (local laws), approve the County budget and set millage rates, and establish the requirements for the departments under its control. The Board governs all unincorporated areas of the county directly; municipalities may call upon the County for specialized services.

2. Are minutes of the Board of Directors' meetings maintained? *The Clerk of the Circuit Court of the Board of County Commissioners attends all meetings of the Board of County Commissioners and other designated County Boards and produces, records, indexes and distributes the official minutes of these meetings.*

3. Is there an organizational chart or similar document establishing clear lines of responsibility and authority? *The County Administrator serves the citizens of the County as it applies to the policies and decisions of the Board of County Commissioners. In all, the Administrator is responsible for the operations of the departments that fall under the Board of County Commissioners. A copy of the organizational chart may be found at <http://www.pinellascounty.org/budget/GeneralOrgChart.pdf>*

4. Are duties for key employees of the organization defined? *All positions within county government have a classification encompassing the general duties of various jobs within the description. The specific job description within a department (Position Requirement Profile) is maintained within the department, as it is more detailed about the duties of the individual position.*

5. Does the organization have grants or cost-reimbursement contracts with other U.S. Department of Health and Human Services components or other Federal agencies? *Pinellas County's Department of Human Services currently has grant funding from the U.S. Department of Health and Human Services' Health Resources Services Administration (HRSA) for a Federally Qualified Health Center for the Homeless Program (330)(h). In 2012, the department was also awarded a capital construction grant from HRSA.*

6. Have any aspects of the organization's activities been audited recently by a Government agency or independent public accountant? *The County Commission contracts with an independent accounting firm to perform an annual audit of the functions and financial activities of the Board and each of the five Constitutional Offices. Each of these entities is independently audited and subject to materiality based upon their own expenditure levels. The audits of the five*

Constitutional Officers along with the Board are then combined into a Comprehensive Annual Financial Report (CAFR).

7. Has the organization obtained fidelity bond coverage for responsible officials and employees of the organization? *Bonds are purchased for all Officers (County Commissioners, and any Appointing Authority required by ordinance or statute to have a bond). Currently bonded are: Commissioners, Tax Collector, Clerk of Court, Sheriff. We also purchase a separate crime policy for ALL employees of Pinellas County.*
8. Has the organization obtained fidelity bond insurance in amounts required by statute or organization policy? *Yes*

B. Accounting System

1. Is there a chart of accounts? *Yes, Pinellas County Government uses an Oracle based financial management system that fully complies with all GAAP and GASB requirements.*
2. Is a double-entry accounting system used? *Yes- Pinellas County uses an Oracle Financial Accounting System.*
3. Does the organization maintain the basic books of account as applicable? *All of the below are components of the Oracle Financial Accounting System*
 - a. General ledger - *Yes*
 - b. Operating ledger - *Yes*
 - c. Project (Job) cost ledger - *Yes*
 - d. Cash receipts journal - *Yes*
 - e. Cash disbursement journal- *Yes*
 - f. Payroll journal - *Yes*
 - g. Income (sales) journal - *Yes*
 - h. Purchase journal - *Yes*
 - i. General journal – *Yes*
4. Does the accounting system adequately identify receipt and disbursement for each grant (or contract)? *Yes, Pinellas County uses Oracle Projects Accounting Module to separately account for grant transactions.*
5. Does the accounting system provide for the recording of expenditures for each program by required budget cost categories? *Yes- Pinellas County has implemented and integrated Hyperion Budget software with the Oracle Financial Accounting system. Budgets are developed by fund, cost center, program, and project.*
6. Does the accounting system provide for recording the non-Federal share and in-kind contributions (if applicable for a grant program)? *Yes- Oracle Projects Module separately records a breakdown of non-federal share and in-kind contributions using a task structure. Tasks are fully customizable.*

7. Does the organization prepare financial statements at least annually? If not, how often?
Yes all financial reports can be accessed via the following link:
<http://www.pinellasclerk.org/aspInclude2/ASPInclude.asp?pageName=transparency2.htm>
8. Have the financial statements been audited within the past 2 years by an independent public accountant? *Yes- Pinellas County has annual independent audits performed by an independent accounting firm.*
9. Does the organization have a bookkeeper or accountant? If no, who is in charge of the accounting section? *Yes- we have many accountants. The Clerk of the Circuit Court and Comptroller of Pinellas, Ken Burke, CPA, is the official accountant to the Board of County Commissioners.*
10. Is there an accounting instruction manual? *Yes*

C. Budgetary Controls

1. Does the organization use an operating budget to control project funds? *Yes- Pinellas County has implemented and integrated Hyperion Budget software with the Oracle Financial Accounting system. Budgets are developed by fund, cost center, program, and project.*
2. Are persons in the organization who approve budget amendments authorized to do so by the Board of Directors or top management? *Yes- The Pinellas County Board of County Commissioners adopts the budget and approves all budget amendments.*
3. Are there budgetary controls in effect to preclude incurring obligations in excess of:
- Total funds available for an award? *Yes- budgetary control extends to the project level which includes grants/awards*
 - Total funds available for a budget cost category? *Yes- budgetary control is at the program level*
4. Are cash requirements and/or drawdowns limited to immediate need? *Yes- our standard process is to draw funds in arrears as a reimbursement of costs incurred and paid*

D. Personnel

1. Are personnel policies established in writing or in the process of preparation which detail at a minimum:
- Duties and responsibilities of each employee's position? *Yes*
 - Qualifications for each position? *Yes*
 - Salary ranges associated with each job? *Yes*
 - Promotion Plan? *Yes*
 - Equal Employment Opportunity? *Yes*
 - Annual performance appraisals? *Yes*
 - Types and levels of fringe benefits paid to professionals, nonprofessionals, officers, or governing board members? *Yes*

All departments in the Unified Personnel System are subject to the Personnel Rules adopted by the Unified Personnel Board. These rules and policies were formulated to comply with federal and state laws and to ensure fair treatment for employees and sound services to citizens. Each department also has its own set of policies and procedures to guide employees in performing their jobs.

2. Is employee compensation reasonable and comparable to that paid for similar work in the competitive labor market? *The Unified Personnel System compensation policy is designed to establish wage and salary ranges that reflect the value of the various jobs, as determined by a formal system of continuing job evaluation and review, taking into account the duties and level of responsibility for each job. It ensures that, for comparable jobs, pay rates and benefits are competitive with the external job market in which the County competes for talent and reflective of the internal value of each position.*
3. Are salary comparability surveys conducted? *Yes, a full survey is conducted annually over the Tampa Bay region. Specific sectors are done on an as needed basis.*

How often? *Annually*

4. Are salaries of personnel assigned to Government projects about the same as before assignment? *Yes, salaries are not adjusted based on the funding source of a project or a change in project assignment. Salaries are adjusted to reflect changes in responsibilities requiring different knowledge, skills, and abilities as determined by evaluation and review. Within Pinellas County Government, all projects are "Government" projects.*

Identify reasons for significant increases. *N/A*

5. Does the organization maintain a payroll distribution system which meets the required standards as contained in the applicable cost principles for that organization? *Yes- Pinellas County follows 2 CFR 200- Uniform Administrative Requirements, Cost Principles, and Audit requirements for Federal Awards.*
6. Does the organization maintain daily attendance records for hourly employees? *Yes- All classified Pinellas County employees are required to submit bi-weekly electronic time sheets that reflect total hours worked on a daily basis.*

Does this show actual time employees sign in and out? *Yes- the Navigators use a separate time accounting system that records actual time*

7. Does the payroll distribution system account for the total effort (100%) for which the employee is compensated by the organization? *Yes- All classified Pinellas County employees are required to submit bi-weekly electronic time sheets that reflect total hours worked on a daily basis.*

8. Who signs and certifies work performed in items 5, 6, and 7 above? *Direct supervisors electronically sign-off on all time sheets using Oracle workflow. The Program manager electronically approves Navigator time sheets for the contracted employees.*
9. Where duties require employees to spend considerable time away from their offices, are reports prepared for their supervisors disclosing their outside activities? *Yes- travel reports are required to include a description of destination and purpose for all travel.*

E. Payroll

1. Does preparation of the payroll require more than one employee? *Yes- We have a payroll division within the Finance Division of the Clerk's office.*
2. Are the duties of those individuals preparing the payroll related? *Yes*
3. Are the names of employees hired reported in writing by the personnel office to the payroll department? *Yes- the payroll system is electronically integrated with the human resources system within the Oracle Financial Accounting System.*
4. Are the names of employees terminated reported in writing by the personnel office to the payroll department? *Yes- the payroll system is electronically integrated with the human resources system within the Oracle Financial Accounting System. Personnel termination actions are included in the electronic integration.*
5. Is the payroll verified at regular intervals against the personnel records? *Yes- the payroll system is electronically integrated with the human resources system within the Oracle Financial Accounting System. Personnel records are included in the electronic integration.*
6. Are all salaries and wage rates authorized and approved in writing by a designated official or supervisor? *Yes- the payroll system is electronically integrated with the human resources system within the Oracle Financial Accounting System. Salary rates are included in the electronic integration.*
7. Are vacation and sick leave payments similarly authorized and approved? *Yes- the payroll system is electronically integrated with the human resources system within the Oracle Financial Accounting System. Vacation time accruals are integrated and requests for vacation and sick leave payments are included in the approval workflow.*
8. Is there verification against payments for vacation, sick leave, etc., in excess of amounts approved and/or authorized? *Yes- payments are limited to accrued balances and all payments must be approved via workflow.*
9. Is the payroll double-checked as to:
 - a. Hours? *Yes*
 - b. Rates? *Yes*
 - c. Deductions? *Yes*

d. Extensions, etc.? *Yes*

10. Are signed authorizations on file for all deductions being made from employees' salaries and wages? *Yes- electronic signatures are captured for all deductions*
11. Is the payroll signed prior to payment by the employee preparing the payroll? *Yes- electronic signatures are captured for all employee time sheet submissions, electronic approvals are required for the contract employees*
12. The employee checking the payroll? *Yes-electronic signatures are captured via workflow for all payroll transactions, electronic approvals are required for the contract employees*
13. Are salary payrolls approved by an authorized official prior to payment? *Yes- electronic signatures are captured via workflow, electronic approvals are required for the contract employees*
14. Are employees paid by check or direct deposit? *Direct deposit is the standard for all payroll payments. New employees may receive 1-2 paper checks prior to direct deposit activation.*
- If no, how are they paid?
New employees are paid by check for the first 1-2 payroll periods, after that by direct deposit.
15. If paid by check, are the checks pre-numbered? *Yes, all check stocks are pre-numbered*
16. Are checks drawn and signed by employees who do not:
- a. Prepare the payroll? *Yes*
 - b. Have custody of cash funds? *Yes*
 - c. Maintain accounting records? *Yes*
- Yes, Pinellas County maintains separation of duties consistent with generally accepted accounting principles*
17. Are payroll checks distributed to employees by someone other than the supervisor?
Yes- all payroll checks are direct deposit. Supervisors will distribute the first couple paychecks until direct deposit is authorized.
18. Is there a payroll bank account? *Yes there is a separate impress payroll account*
- If no, will one be opened if recipient is selected for award? *N/A*
19. Is the payroll bank account reconciled by someone other than payroll staff or personnel who sign and distribute the pay checks? *Yes, Pinellas County maintains separation of duties consistent with generally accepted accounting principles*

F. Consultants

1. Are there written policies or consistently followed procedures regarding the use of consultants which detail at a minimum:
 - a. Circumstances under which consultants may be used? *Yes*
 - b. Consideration of in-house capabilities to accomplish services before contracting for them? *Yes*
 - c. Requirement for solicitation or bids from several contract sources to establish reasonableness of cost and quality of services to be provided? *Yes*
 - d. Consulting rates, per diem, etc.? *Yes*

Pinellas County government procurement rules (local ordinance) includes contracting for professional services CONSULTANT COMPETITIVE NEGOTIATION ACT (CCNA) as per Florida Statute (F.S.) 287.055

2. Are consultants required to sign consulting agreements outlining services to be rendered, duration of engagement, reporting requirements, and pay rates? *Yes – all consulting agreements are comprehensive and include services to be rendered, duration of engagement, reporting requirements, and pay rates*

G. Property Management

1. Are records maintained which provide a description of the items purchased, the acquisition cost, and the location? *Yes- Pinellas County maintains a detailed fixed asset accounting system*
2. Are detailed property and equipment records periodically balanced to the general ledger? *Yes- at least annually*
3. Are detailed property and equipment records periodically checked by physical inventory? *Yes- annual inventory*
4. Are there written procedures governing the disposition of property and equipment? *Yes, Pinellas County maintains policies and procedures for the transfer and disposal of excess and surplus property consistent with requirements set forth in Florida Statutes, Chapter 274.*
5. Are periodic reports prepared showing obsolete equipment, equipment needing repair, or equipment no longer useful to the organization? *Yes, this is part of the inventory and fixed assets system.*
6. Does the organization have adequate insurance to protect the Federal interest in equipment and real property? *Yes, Pinellas County is self-insured per Florida Statutes, Chapter 768.28, but also maintains catastrophic insurance coverage for all property.*

H. Purchases

1. Does the organization have written purchasing procedures? *Yes, Pinellas County has a Purchasing Policy and Procedures Manual and has codified purchasing rules within the Pinellas County Code*

If not, briefly describe how purchasing activities are handled. *N/A*

2. Does the policy/procedure consider such matters as quality, cost, delivery, competition, source selection, etc.? *Yes, the Policy is a very comprehensive document which includes all aspects of the procurement process.*
3. Has the responsibility for purchasing been assigned to one department, section, or individual within the organization? *Yes, the Pinellas County Purchasing Department.*

If not, explain. *N/A*

4. Is the purchasing function separate from accounting and receiving? *Yes, the Purchasing Department is organizationally under the Board of County Commissioners, accounting is maintained by Finance Division under the Comptroller, and receiving is handled by the department who initiated the request for the service/commodity.*
5. Are competitive bids obtained for items such as rentals or service agreements over certain amounts? *Yes, the Purchasing manual details when to use competitive bids, proposals, etc.*
6. Are purchase orders required for purchasing all equipment and services? *Yes, purchase orders are used for procurement of goods and services.*
7. Is control maintained over items or dollar amounts requiring the contracting or grants management officer's advance approval? *Yes*

Describe controlling factors.

Pinellas County Purchasing Policy and Procedure Manual (excerpt):

The responsibilities of OMB include initiating, reviewing and/or administering grant applications and grants and Contracts in accordance with the approved grant procedures, intergovernmental agreements, and determining and coordinating alternative means of financing acquisitions consistent with approved cash management goals and the approved budgets for all Non-Purchasing Contracts.

The project manager is responsible for initiating expenditures that are consistent with federal and state regulations for the specific project and expenditures that meet the conditions of the grant agreement. The budget is to be monitored to ensure compliance with purchasing and accounting policies and guidelines and to ensure spending stays within the established budget.

The project manager reviews prepared contracts, if included in the project's approved budget, with outside vendors for all specifications and conditions required by the grant agreement.

8. Is the accounting department notified promptly of purchased goods returned to vendors? *Yes, the purchasing module is integrated into the Oracle Financial Accounting System*
9. Is there an adequate system for the recording and checking of partial deliveries and checking deliveries against purchase orders? *Yes, check of deliveries and updating the Oracle Purchasing Module is the responsibility of the receiving department*

10. When only a partial order is received, is the project account credited for the undelivered portion of the purchase order? *Yes, this is part of the receiving process performed by the receiving department.*

11. Are the vendor invoices checked for:
- a. Prices and credit terms? *Yes*
 - b. Extensions? *Yes*
 - c. Errors and omissions? *Yes*
 - d. Freight charges and disallowances? *Yes*

Invoices are routed to the receiving department via workflow prior to payment by Finance Division.

12. Are vouchers, supporting documents, expenses, or other distributions reviewed and cleared by designated staff before payment is authorized? *Yes, all supporting documentation is included in the workflow for electronic approval and authorization*

I. Travel

1. Does the organization have formal travel policies or consistently followed procedures which, at a minimum, state that:
- a. Travel charges are reimbursed based on actual costs incurred or by use of per diem and/or mileage rates? *Yes*
 - b. Receipts for lodging and meals are required when reimbursement is based on actual cost incurred? *Yes*
 - c. Per Diem rates include reasonable dollar limitations? *Yes*
Subsistence and lodging rates are comparable to current Federal per diem and mileage rates? *Yes*
 - d. Commercial transportation costs are incurred at coach fares unless adequately justified? *Yes*
Travel requests are approved prior to actual travel? *Yes*
 - e. Travel expense reports show purpose of trip? *Yes*

The Guidelines for Payment and/or Reimbursement of Travel Expenses for Pinellas County Officers and Employees became effective November 1, 2003. The purpose of these guidelines is to foster equity, uniformity and efficiency in the payment and/or reimbursement of authorized travel expenses for officers and employees within Pinellas County government. The Guidelines cover all of the minimum requirements identified in the NOFA.

J. Internal Controls

1. Is there a separation of responsibility in the receipt, payment, and recording of cash?
- a. For example: Are the duties of the record keeper or bookkeeper separated from any cash functions such as the receipt or payment of cash? *Yes*
 - b. Or, is the signing of checks limited to those designated officials whose duties exclude posting and/or recording cash received, approving vouchers for payment, and payroll preparation?

Yes, Pinellas County maintains separation of duties consistent with generally accepted accounting principles

2. Are all checks approved by an authorized official before they are signed? *Yes, the Oracle Financial Accounting System routes transactions through workflow for appropriate authorization and approval. Some transactions are sent to finance via a Miscellaneous Template once approved by authorized personnel*
3. Are all accounting entries supported by appropriate documentation (e.g., purchase orders, vouchers, vendor payments)? *Yes, each transaction within the Oracle Financial Accounting System includes electronic/scanned support.*
4. Does the organization have an internal auditor or internal audit staff? *Yes – the Pinellas County Office of the Auditor General performs internal audits*
5. Is there a petty cash fund where responsibility is vested in one individual; limited to a reasonable amount; restricted as to purchase; and counted, verified, and balanced by an independent employee at time of reimbursement? *Yes, there are separate petty cash funds located where appropriate, each maintained by a designated petty cash custodian.*
6. Are all checks pre-numbered and accounted for when general purpose bank account is reconciled? *Yes, all checks are reconciled and accounted for during the monthly bank reconciliation process.*
7. If a mechanical or facsimile signature is used for cash disbursements, is the signature plate, die, key, electronic card, etc., under strict control? *Yes, security and strict control is maintained over signature plate access and use.*
8. Are bank accounts reconciled by persons not handling cash in the organization? *Yes, Pinellas County maintains separation of duties consistent with generally accepted accounting principles*
9. Are all employees who handle funds required to be bonded against loss by reason of fraud or dishonesty? *Bonds are purchased for all Officers (a.k.a Commissioners, and any Appointing Authority required by ordinance or statute to have a bond). Currently bonded are: Commissioners, Tax Collector, Clerk of Court, Sheriff. We also purchase a separate crime policy for ALL employees of Pinellas County.*



Navigator Program Conflict of Interest Standards

Persons serving as Pinellas County Health Care Navigators are required to comply with county guidelines and standards adopting the Florida Statutes Section 112 (entitled, Code of Ethics for Public Officers and Employees). State of Florida law also sets guidance for navigators in the Florida Statutes Section 626.995 (entitled, Navigators) et. seq.

Funding and Compensation

Navigator entities and Individual Exchange Navigators cannot receive compensation from a carrier, insurance producer, TPA or Medicaid MCO for enrollment into QHPs/Medicaid/MCHP or for enrollment in a non-QHP. (Section 626.9957(3) (c)).

Character

- Any person who has committed a felony of the first degree; a capital felony; a felony involving money laundering, fraud, or embezzlement; or a felony directly related to the financial services business will not be allowed to apply for a position as a Pinellas County Marketplace Navigators. (Section 626.9954(2)).
- Any person who has committed a felony involving moral turpitude within the last fifteen (15) years, will not be allowed to apply for a position as a Pinellas County Marketplace Navigators. (Section 626.9954(3)(a)).
- Any person who has committed a felony within the last seven (7) years will not be allowed to apply for a position as a Pinellas County Marketplace Navigators. (Section 626.9954(3)(b)).
- Any person who has committed a misdemeanor directly related to the financial services business will not be allowed to apply for a position as a Pinellas County Marketplace Navigators. (Section 626.9954(3)(c)).

Outreach and Messaging

- Navigators work under Florida Statutes where there is a clear prohibition on steering or otherwise encouraging individuals or small businesses to enroll in a plan or product on a basis other than the consumer or employer's best interests or that is outside of the Marketplace. (Section 626.9957(20)).

Navigator Program Conflict of Interest Enforcement Procedures

Exchange Protocols

Navigators are responsible for complying with all State and County Ethics laws and rules as further explained in the attached Memo to New Hires in Pinellas County. See attached Pinellas County Ethics Guide Memo that references County Policy State of Florida Statute links:

http://www.flsenate.gov/Laws/Statutes/2015/Chapter626/PART_XIII/ and
http://www.flsenate.gov/Laws/Statutes/2015/Chapter112/PART_III/

A Pinellas County Marketplace Navigator who intentionally defrauds the public or its public agency for profit or other gain, through use of their public office shall be guilty of a felony, dismissed from employment and subject to a ten thousand dollar (\$10,000) fine. (Section 112.3173(2) e)

Navigator Disclosure Policy

Although certain conflicts of interest are not automatic bars to serving as a Navigator, The County recognizes the need to disclose those issues to the Exchange and to each consumer receiving application assistance which as listed below:

- Navigator shall disclose to the Public Health Care Administrator any and all significant financial and/or other interests including personal relationships of the Navigator (for example, spouse, dependent children, etc.): (i) that would reasonably appear to be affected by the grant activities funded or proposed for funding by CMS; or (ii) in entities whose financial or other interests would reasonably appear to be affected by such activities.
- The Health Care Administrator shall (1) review any potential conflict of interest; (2) determine whether a potential (appearance of) or real conflict of interest exists; and (3) Establish what conditions, or restrictions, should be imposed to eliminate the conflict of interest.
- This information shall be conveyed to the Director of Pinellas County Human Services who is designated to act on behalf of the applicable CMS award.
- Prior to expending funds under a new CMS award, the Director shall inform the applicable CMS Grants Management Specialist and Project Officer of any real or potential conflict of interest in a report detailing the County's plan to eliminate the conflict prior to spending CMS funding on the activities in question.
- Similar reports for subsequently identified conflicts shall be made within 30 days of identifying them. Funding for those specific activities should cease until the aforementioned steps are completed.
- Continual updates shall be made for any real or potential conflicts of interest not fully resolved. Additional information shall be made available to the CMS Grants Management Specialist and Project Officer, upon request, as to how the County is handling (or had handled) the real or potential conflict of interest.
- The County shall maintain records of all disclosures and of all actions taken to resolve conflicts of interest for at least three years beyond the termination or completion of the grant to which they relate, or until the resolution of any CMS action involving those records, whichever is longer.

A. D. No. 15-1
Effective Date: Current
Reviewed Date: _____
County Administrator
Approved: Yes

**PINELLAS COUNTY
ADMINISTRATIVE DIRECTIVE**

ETHICS GUIDE FOR EMPLOYEES OF PINELLAS COUNTY

SUMMARY:

The County Attorney provides a memo that directs County employees on ethics laws governing their performance. All County employees are expected to comply with these requirements, restrictions and prohibitions. Do not hesitate to discuss your questions with your supervisor.

DOCUMENT:

ETHICS GUIDE FOR EMPLOYEES OF PINELLAS COUNTY DIRECTIVE

Issued by:
County Attorney Office

ETHICS GUIDE FOR EMPLOYEES OF PINELLAS COUNTY DIRECTIVE

SUPERSEDES: Memo issued by the County Attorney on August 23, 2000, reference same subject.

DEFINITIONS: N/A

PROCEDURE:

Our performance of County duties is governed principally by four different ethical regulations. These include:

- The Florida Code of Ethics for Public Officers and Employees, located at Chapter 112 of the *Florida Statutes*;
- Pinellas County's Conflict of Interest Ordinance, located at Section 2-1-78, et seq., of the *Pinellas County Code*;
- The *Pinellas County Personnel Rules*, which are applicable to those employees within the Unified Personnel System; and
- The *Pinellas County Statement of Ethics*.

What follows is an outline of some requirements, restrictions and prohibitions which the above-listed sources place upon County employees:

1. Solicitation or Acceptance of Gifts. Public officers and employees are prohibited from soliciting or accepting anything of value, such as a gift, loan, reward, promise of future employment, favor or service, which is based on an understanding that their official action or judgment would be influenced by such a gift. Additionally, the County's Personnel Rules prohibit acceptance of a gift if it could be construed as a means of receiving a favor or obtaining better treatment than that accorded other persons, either presently or in the future. However, the Pinellas County Statement of Ethics states that County employees will not accept any gifts or gratuities from those with whom they do business.

2. Unauthorized Compensation. County employees and their spouses and minor children are prohibited from accepting any compensation, payment or other thing of value when they know, or with the exercise of reasonable care should know, that it is given to influence their official action.

3. Misuse of Public Position. County employees are prohibited from corruptly using or attempting to use their official positions to obtain a special privilege for themselves or others.

4. Disclosure or Use of Certain Information. County employees are prohibited from disclosing or using information not available to the general public and obtained by reason of their public positions for the personal benefit of themselves or others.

5. Doing Business With One's Agency. County employees, acting in a private capacity, are prohibited from renting, leasing or selling any realty, goods or services to the County or any of its agencies.

6. Conflicting Employment or Contractual Relationship. County employees may not hold any employment or contractual relationship with any business or agency that is regulated by or doing business with their public agency. They also may not hold an employment or contractual relationship that will pose a frequently recurring conflict between their public duties and private interests, or which will impede the full and faithful discharge of their public duties.

7. Employees Holding Office. A County employee may not be a member of the governing body which serves as his employer while also continuing as an employee of that body.

8. Nepotism. County officials may not seek any appointment, employment, promotion or advancement for a relative in the agency in which they are serving or over which they exercise jurisdiction or control.

9. Misappropriation of County Property. County employees may not appropriate County property or County funds for their personal use, except for authorized wages or reimbursement, or illegally dispose of County property.

COMMENTS:

If you happen to be an employee who is required to file a financial disclosure form annually, some special rules regarding gifts apply to you. You should contact Bill Falkner in our office at 464-3354 and he will explain these to you.

AUTHORITY:

1. *Florida Code of Ethics for Public Officers and Employees*, located at §§ 112.311, et seq., of the *Florida Statutes*.
2. *Pinellas County Code*, § 2-1-78, et. seq.
3. *Pinellas County Personnel Rule XXIV.J.(46)*
4. *Pinellas County Statement of Ethics*