

**Gateway Area Agency on Aging and Independent Living
Policy Manual and Operating Procedures**

**Chapter 21
State Health Insurance Program
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Introduction

The State Health Insurance Assistance Program, or SHIP, is a state-based program that offers local one-on-one counseling and assistance to people with Medicare and their families. Through CMS funded grants directed to states, SHIPs provide free counseling and assistance via telephone and face-to-face interactive sessions, public education presentations and programs, and media activities. SHIP (formerly the Information, Counseling and Assistance (ICA) Grants Program) was created under Section 4360 of the Omnibus Budget Reconciliation Act (OBRA) of 1990 (Public Law 101-508). This Act authorizes the Centers for Medicare & Medicaid Services (CMS), the Federal Medicare agency, to make grants to states for health advisory services programs for people with Medicare. Currently, there are SHIPs in all 50 states plus Washington, D.C., Guam, Puerto Rico and the Virgin Islands. Although States have adopted a variety of methods to provide such services to individuals, Section 4360 of the Omnibus Budget Reconciliation Act of 1990 requires that each State program must encompass all of the following activities:

(1) Counseling and assistance to eligible individuals in need of health insurance information, including:

(a) Information that may be of assistance to individuals in obtaining benefits and filing claims under Titles XVIII and XIX of the Social Security Act.

(b) Policy comparison information for Medicare supplemental policies (as described in section 1882(g)(1) of the Social Security Act, as amended) and information that may assist eligible individuals with filing claims under such Medicare supplemental policies.

(c) Information regarding long-term care insurance.

(d) Information regarding Medicaid programs, including Medicare Savings Programs.

(e) Information provided to individuals detailing other types of health insurance benefits that may be available to eligible individuals throughout the State.

(f) Information regarding health insurance coverage options created under the Balanced Budget Act of 1997 and subsequent amendments under the Balanced Budget

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Refinement Act of 1999, and the Benefits Improvement and Protection Act of 2000, and the Medicare Prescription Drug, Improvement and Modernization Act (DIMA) of 2003.

(2) Outreach programs, other than one-on-one counseling, to provide health insurance information, counseling, and assistance to eligible individuals.

(3) Systems of referral to appropriate Federal or State departments or agencies that provide assistance with problems related to health insurance coverage (including legal problems).

(4) Establishing a sufficient number of staff positions (including volunteers) necessary to provide the services of a health insurance information, counseling, and assistance program.

(5) Assuring SHIP staff members (including volunteers) have no conflict of interest in providing health insurance information, counseling and assistance, and abiding by the *SHIP Security Plan Guidelines* for safeguarding confidential beneficiary information.

(6) Collecting and disseminating timely and accurate health insurance information to staff members (including volunteers).

(7) Training programs for staff members (including volunteers).

(8) Coordination of health insurance information-sharing between the staff of departments and agencies of the State government, and other pertinent federal agencies including CMS and SHIP staff (including volunteers).

(9) Making recommendations concerning consumer issues and complaints related to the provision of health care to agencies and departments of the State and Federal government responsible for providing or regulating health insurance.

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Personalized Counseling

Gateway SHIP will provide personalized counseling to a diverse population of Medicare beneficiaries unable to access other channels of information or needing and preferring locally based individual counseling services.

Procedure:

(1) The Gateway SHIP will provide information, counseling, and assistance to meet the personalized needs of the Medicare beneficiaries, their families, and caregivers, in regards to Medicare, Medicaid, Long-Term Care Insurance, and Medigap policies, prescription assistance, and other health insurance issues.

(2) The Gateway SHIP will assist in enrollment and application via phone, computer, home visits, and outreach events. LIS applications can be completed on line, by phone, or home visits. Information about location of their local Social Security Administration Office is to be given to the beneficiaries, if the beneficiaries prefer to complete the application through their local SSA Office.

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Targeted Community Outreach

Gateway SHIP will conduct targeted community outreach to beneficiaries in public forums either under their sponsorship or with community-based partners or coalitions to increase understanding of Medicare program benefits, and raise awareness of the opportunities for assistance with benefit and plan selection.

Procedure:

The Gateway SHIP will reach out to community-based partners to reach low-income populations, including the elderly living in rural areas, African Americans, and seniors with disabilities. Partnerships will be pursued with the following entities or agencies:

- (1) Clinics,
- (2) Hospitals,
- (3) Home health agencies,
- (4) Case managers,
- (5) Physicians' offices,
- (6) Pharmacies,
- (7) Libraries,
- (8) Church groups,
- (9) Housing complexes,
- (10) Kentucky Seniors Saving Medicare,
- (11) Social Security Administration,
- (12) Office of Insurance,
- (13) Department for Medicaid Services,

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(14) Local Community Based Service Offices,

(15) American Cancer Society,

(16) Health Care Excel, Inc.,

(17) Access to Justice Foundation, Inc.,

(18) National Government Services, AARP,

(19) Local Community Health Departments,

(20) Community Action Agencies,

(21) Local Senior Centers, and

(22) The Long-Term Care Ombudsman

These partners will be able to assist Gateway SHIP to gain access to diverse audiences that may not have been reached if these partnerships were not in place.

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Counselor Work Force

Gateway SHIP will increase and enhance beneficiary access to a counselor work force that is trained and fully equipped and proficient in providing the full range of services including enrollment assistance in appropriate benefit plans, and continued enrollment assistance in prescription drug coverage.

Procedure:

(1) The personalized needs of the Medicare beneficiaries will be addressed through group events, one-on-one counseling (via telephone and internet/computer, home visits, and on-site visits at enrollment centers). Gateway SHIP will help Medicare beneficiaries understand the Medicare Prescription Drug Coverage in addition to facilitating prescription-drug plan comparisons. The Gateway SHIP Coordinator will also be responsible for ensuring that Gateway Area Agency on Aging and Independent Living has updated copies of the CMS mandated SHIP confidentially statements as well as providing Gateway Area Agency on Aging and Independent Living with up to date listings of all SHIP counselors/volunteers.

(2) The Gateway SHIP Coordinators shall implement the DAIL SHIP DREAM (D-Dedicated Counselor, R-Recruiter, E-Educator, A-Administrator, and M-Marketer) approach to volunteer recruitment. Position descriptions follow:

(3) Position descriptions follow:

Position: Volunteer Dedicated Counselor

Purpose of Position:

Provide health insurance information, assistance, and referral to Medicare beneficiaries.

Responsible to: Gateway SHIP Coordinator

Responsibilities:

- Satisfactory completion of certification training and the recertification process conducted under the auspices of KY SHIP
- Conducts individual health insurance counseling sessions without conflict of interest and in compliance with KY SHIP regulations

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- Assesses client's needs for information and/or assistance
- Provides information about traditional and nontraditional Medicare, Medicaid, Medicare supplementary insurance, and long term care insurance
- Assists with health insurance claims filing, reviews EOMBs and provider bills, and organizes all documents related to health insurance
- Provides informal claim and appeals advocacy as required
- Maintains client confidentiality at all times
- Satisfactorily completes recertification training as required by KY SHIP and CMS
- Completes a follow up contact with clients to ensure all insurance problems are resolved and the client is satisfied with the counseling received

Desired Qualifications:

- Ability to work with others
- Sensitive and caring attitude
- Willingness to learn and an ability to retain information relevant to health insurance provisions and claims filing procedures
- Good written and oral communication skills
- Pleasant but assertive personality
- Willing to commit sufficient time to handle several ongoing projects at a time

Position: Volunteer Recruiter

Purpose of Position: To recruit individuals as Gateway SHIP Volunteers in order to provide health insurance information, assistance, and referral to Medicare beneficiaries.

Responsible to: Gateway SHIP Coordinator

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Responsibilities:

- Satisfactory completion of certification training and the recertification process conducted under the sponsorship of KY SHIP
- Develop administrative procedures and rules for conducting Gateway SHIP activities
- Assist Gateway SHIP Coordinator in implementing the procedures
- At the beginning of each month complete a monthly schedule detailing all planned activities
- Update the planned schedule at the end of each month with changes, cancellations, and additions
- Maintain a monthly record of completed Gateway SHIP local activities
- Submit an annual report summarizing all Gateway SHIP local activities
- Conduct follow-up activities with volunteers and clients to ensure attendance at scheduled events
- Coordinate logistical needs of volunteer counselors and clients concerning printed materials, meeting space, and transportation
- Control and maintain adequate informational materials for distribution in accordance with planned activities and counselor needs
- Collect and submit to the Gateway SHIP Coordinator a KY SHIP Counselor Report (blue form) for each counseling activity conducted by a volunteer counselor

Desired Qualifications:

- Good attention to detail and clerical skills
- Good written and oral communication skills Able to effectively delegate tasks
- Ability to get along with others

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- Willing to commit sufficient time to handle several ongoing projects at a time

Position: Volunteer Educator

Purpose of Position:

To instruct the community and volunteer counselors on Gateway SHIP's purpose and goals, changes in Medicare, and current issues affecting Medicare beneficiaries.

Responsible to: Gateway SHIP Coordinator

Responsibilities:

- Satisfactory completion of certification training and the recertification process conducted under the sponsorship of KY SHIP
- Assist Gateway SHIP's local office in developing a presentation explaining the purpose, goals, and operation of Gateway SHIP
- Actively increase community knowledge of Gateway SHIP by conducting presentations at meetings and social events
- Coordinate with the Volunteer Administrator all scheduled speaking engagements and availability for future events
- Utilize KY SHIP materials and updates, local library, newspapers, and the internet in order to maintain a file of all changes to Medicare and current issues affecting Medicare beneficiaries
- Prepare a monthly memorandum summarizing and highlighting completed speaking engagements. Submit to the Gateway SHIP Coordinator along with sign-in sheet or attendance estimate
- Distribute Gateway/KY SHIP approved information to Dedicated Counselors
- Continually refine presentation based upon new information and regulations

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- Assist Gateway SHIP Coordinator with training staff in initial training for new volunteers and refresher training
- Assist Gateway SHIP Coordinator with training staff in volunteer recertification process

Desired Qualifications:

- Access to and proficient in the use of basic word processing programs on a personal computer
- Access to the internet
- Experience in public speaking, teaching or training
- Good written and oral communication skills
- Proficient in researching and interpreting complex issues
- Ability to work with others
- Willingness to commit sufficient time to handle several ongoing projects at a time

Position: Volunteer Administrator

Purpose of Position:

Implement and maintain a program for effective scheduling, staffing, logistical support, and recording of Gateway SHIP activities within the GADD counties (areas).

Responsible to: Gateway SHIP Coordinator

Responsibilities:

- Satisfactory completion of certification training and the recertification process conducted under the sponsorship of KY SHIP
- Develop administrative procedures and rules for conducting Gateway SHIP activities

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- Assist Coordinator in implementing the procedures
- At the beginning of each month complete a monthly schedule detailing all planned activities
- Update the planned schedule at the end of each month with changes, cancellations, and additions
- Maintain a monthly record of completed Gateway SHIP activities
- Submit an annual report summarizing all Gateway SHIP activities
- Conduct follow-up activities with volunteers and clients to ensure attendance at scheduled events
- Coordinate logistical needs of volunteer counselors and clients concerning printed materials, meeting space, and transportation
- Control and maintain adequate informational materials for distribution in accordance with planned activities and counselor needs
- Collect and submit to the Coordinator a KY SHIP Counselor Report (blue form) for each counseling activity conducted by a volunteer counselor

Desired Qualifications:

- Good attention to detail and clerical skills
- Good written and oral communication skills
- Able to effectively delegate tasks
- Ability to work with others
- Willing to commit sufficient time to handle several ongoing projects at a time

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Position: Volunteer Marketer

Purpose of Position: Promote community awareness of Gateway SHIP's health insurance information, assistance, and referral program for Medicare beneficiaries.

Responsible to: Gateway SHIP Coordinator

Responsibilities:

- Satisfactory completion of certification training and the recertification process conducted under the sponsorship of KY SHIP
- Develop and submit marketing plan to KY SHIP home office via Gateway SHIP Coordinator for KY SHIP approval
- Implement and evaluate success of marketing plan based upon stated goals and objectives
- Maintain a good working relationship with media and network contacts established as part of marketing plan
- Meet regularly with Gateway SHIP Coordinator to adjust marketing plan and/or counseling services to reflect client needs
- Coordinate with the GAAAIL for reciprocal promotion of various programs dealing with older and disabled persons
- Assist with local office outreach program targeting non-English speaking beneficiaries throughout the county
- Submit timely requests to the Volunteer Administrator for informational materials needed to execute the marketing plan
- Cooperate with local office's marketing efforts
- Continually refine marketing plan based upon client needs and expectations

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Desired Qualifications:

- Actively involved in community groups, associations and events
- Good written and oral communication skills
- Marketing, sales, advertising or public relations background Ability to work with others
- Willingness to commit sufficient time to handle several ongoing projects at a time

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Training

SHIPs will participate in CMS education and communication activities, thus enhancing communication between CMS and SHIPs to assure that SHIP counselors are equipped to respond to both Medicare program updates and a rapidly changing counseling environment and to provide CMS with information about the support and resources that SHIPs need to provide accurate and reliable counseling services.

The Gateway SHIP Coordinator will be responsible for recruiting, training, and maintaining documentation on their volunteers. It is mandatory that all counselors and volunteers attend the training. The department completes SHIP monitoring, including reviewing areas about local procedures for volunteer recruitment, retention, and supervision; identifying how many volunteers are utilized in each county within their service area, and what efforts are made to recruit volunteers. The SHIP monitoring reviews whether the SHIP counselors were trained within thirty-(30) days of their start date.

Procedure:

(1) Counselors are required to attend annual SHIP trainings and updates. KY SHIP participates in trainings to further the knowledge of the public benefits that affect the elderly and persons who are disabled. Coordinators and volunteers are encouraged to participate in MMA forum calls, ABC/NCOA training calls, HAP calls, and open door forecasts. The “National Medicare Training Program CD Suite” is to be given to all counselors/volunteers.

(2) Cancellation Policy: 24 Hours written notification must be given to cancel attendance or lodging reservation. Notification must be in the form of e-mail or fax. Failure to cancel will result in the Department billing the counselors host agency for the full amount of the missed training. The agency cannot require any volunteer to reimburse for this bill.

(3) ALL SHIP trainings and updates will meet hours as determined by CMS and DAIL requirements.

(4) Each AAA is required by contractual agreement to conduct aggressive methods to recruit volunteers and provide support through a plan of ongoing training and supervision aimed toward retention of volunteers. *

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(a) The volunteer is expected to have received at least eighteen (18) hours of initial training and twelve (12) hours of update training in Medicare, Medicare Advantage (if in their area), Medicare Supplement Insurance, Long-Term Care Insurance, Medicare, SSI, QMB, SLMB, QDW1, QI1, and Spend-Down Counseling at the completion of the training.

(b) The National Medicare Training Program 20__ CD Suite is to be used by all volunteers as a training module.

(c) Each local coordinator is allowed to have more training for volunteers. (A copy of the requirements is to be sent to Gateway Area Agency on Aging and Independent Living SHIP Director to be

Non-attendance: Counselors who do not attend each portion of the training will not receive full credit and must make up any missed training through their host agency. Counselors who are registered for training but do not attend the sessions must make up the sessions and the host agency will be billed the full amount of training cost.

***All requirements are based on CMS requirements. Changes may be required per CMS requirements.**

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Funding Usage

Gateway SHIP will utilize funding to enhance the basic program structure through counselor development, training activities, outreach efforts, and partnership building.

Procedure:

(1) Recruitment for new Gateway SHIP counselor volunteers is an ongoing endeavor and efforts continue to increase their capabilities to provide services is done thru ongoing education. The Gateway SHIP Coordinator is responsible for providing ongoing training for the GADD area as needed. All SHIP counselors whether paid or volunteer are encouraged to provide suggested topics and presenters for the trainings.

(2) The Department mandates that all SHIP counselors attend SHIP trainings each program year.

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Quality Assurance

Gateway Area Agency on Aging and Independent Living will provide quality assurance measures to assure the accuracy of the information provided by SHIP counselors, including counselor-training, certification, and monitoring.

Procedure:

SHIP monitoring includes reviewing areas such as local procedures for volunteer recruitment, retention, and supervision; number of volunteers utilized in each county in the Gateway service area, and efforts made to recruit volunteers.

- (1) The Gateway SHIP Coordinator is responsible for recruiting, training, and maintaining documentation on their volunteers.
- (2) The department completes SHIP monitoring, including reviewing areas' local procedures for volunteer recruitment, retention, and supervision; identifying how many volunteers are utilized in each county in their service area, and what efforts are made to recruit volunteers.
- (3) Counselors are required to attend annual SHIP trainings and updates. Coordinators and volunteers are encouraged to participate in MMA forum calls, ABC/NCOA training calls, HAP calls, and open door forecasts. The "National Medicare Training Program CD Suite" is to be given to all counselors/volunteers. Each counselor is required to be signed up for SHIPtalk.
- (4) The SHIP monitoring reviews:
 - (a) Documentation of whether or not SHIP counselors were trained within thirty-(30) days of their start date.
 - (b) Documentation that each counselor has received at least eighteen (18) hours of initial training and twelve (12) hours of update training in Medicare, Medicare Advantage (if in their area), Medicare Supplement Insurance, Long-Term Care Insurance, Medicare, SSI, QMB, SLMB, QDW1, Q11, and Spend-Down Counseling at the completion of the training.
 - (c) Documentation that coordinators ensure that all counselors receive all SHIP education opportunities via email correspondence or mailed to counselors that do not have computer access within 48 hours.

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(5) The Gateway SHIP Coordinator will be responsible for oversight of volunteers including criminal record checks, maintenance of a training log, completing volunteer agreements, updating job descriptions and confidentiality statements, providing training, and keeping the manual for counselors updated on the local level.

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CMS Initiatives

Gateway SHIP and the Gateway Area Agency on Aging and Independent Living will collaborate with community, state and local officials to support coordinated, community-wide efforts to help beneficiaries learn about, understand, and utilize preventive services covered by Medicare and support the CMS initiatives for said program year.

Procedure: To be determined based upon CMS requirements.

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SHIP Area Plan

Gateway Area Agency on Aging and Independent Living will submit to DAIL for approval a plan for the administration and operation of SHIP in the Gateway district. SHIP funds shall be used to support locally accessible counseling services through efforts that include, but are not limited to following:

- (1) Recruiting and training counselors in local communities;
- (2) Providing support to local organizations that serve as local SHIP counseling locations;
- (3) Conducting quality assurance and improvement initiatives in support of locally-based counselors;
- (4) Funding systems to connect beneficiaries to local counseling assistance; and
- (5) Providing Internet access to local counselors and generally supporting efforts to provide locally accessible counseling services.
- (6) Provide program reports as prescribed by DAIL and CMS.

Procedure:

GAAAIL will submit individualized plans (via the Area Plan) to detail how the above statement will be met within their area.

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Reporting Requirements

All SHIPs must submit the specified NPR data by the required report deadlines and measures.

Performance Awards, Infrastructure Assistance, and Creating a Volunteer Program

(Please note: Performance Awards Stipends are pending final approval)

The use of funds for stipends will be used for three areas: performance awards, infrastructure assistance and creating a volunteer program to assist with the completion of forms for prescription assistance. Department for Aging and Independent Living intends to begin “rewarding” the local SHIP programs that meet the performance measures that have been detailed in their contracts. These measures include **timely reporting, accurate reporting, increase counseling and increased volunteer recruitment and retention.**

Funds will also be utilized to develop a volunteer program that will assist individuals attempting to apply for prescription assistance through pharmaceutical companies or other organizations that provide assistance. SHIP counselors currently provide this information but the volunteers will assist with the actual completion of the forms. Funds will be used to assist with printing cost as well as any travel cost related to providing this assistance.

Performance Awards will provide funding opportunities for SHIPs that will reflect the demonstrated achievement in providing services to Medicare beneficiaries. Eligibility for Performance Awards will be determined through rankings of SHIPs based on performance measures using data reported by SHIPs to CMS through the National Performance Reporting (NPR) system.

To be eligible, a SHIP must have submitted NPR data within all quarterly reporting deadlines for each of the performance measures listed below as described in the *Performance Measures*. SHIPs will then be ranked based upon the service ratios associated with each of these measures:

(1) Total number of one-on-one client contacts in the local areas (AAA's), including telephone, in-person, and home visits.

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(2) Total number of Medicare beneficiaries reached by individual client contacts, in-person group outreach and education and enrollment events in the AAA's. (Audiences targeted through activities such as public service announcements are not included in the measure.)

3) Total number of individual client contacts reported with the topic discussed relating to enrollment or enrollment assistance, including eligibility, benefits and/or benefits comparisons.

(4) Number of active full-time equivalent SHIP counselors in the State. (This measure includes the total combined time of paid and volunteer staff calculated on a full-time equivalent (FTE) measure.)

(5) Number of active full-time equivalent SHIP counselors in local organizations and in the field. (This measure includes the total combined time of paid and volunteer staff calculated on a full-time equivalent measure.)

The service ratios and associated SHIP rankings will be based on the NPR data submitted through the Client Contact, as well as Public and Media Activity (PAM) data submitted to CMS. NPR and PAM Activity data used will be from the reporting period of July 1, each funding year, through June 30, each funding year. Resource Report data submitted and utilized for service ratios and SHIP rankings will be from the period of April 1, each funding year, through March 31, each funding year.

Awards may be used to develop, enhance, or expand local program components.

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SHIP Communications with Customer Service Representatives (CSRs)

(1) Background

The HIPAA Privacy Rule sections 164.510(b) (i) and 164.510(b) (2) (iii) allow certain entities to provide information to another entity for their involvement in an individual's care or payment related to the individual's health care. Since many SHIP encounters are to assist people with Medicare (beneficiary) resolve Medicare claims-related payment issues/questions, SHIPs are recognized as one of these entities.

(2) Procedures for Communicating with CSRs

(a) All 1-800-MEDICARE, and participating Medicare Advantage and Part D Plan sponsors are instructed to disclose Medicare entitlement and claims payment-related information to a SHIP director/counselor/volunteer (counselor) when one of the two following mandatory conditions are met:

1. The CSR has written or verbal authorization from a beneficiary or their caregiver/representative to provide information to a SHIP counselor; **or**,
2. The counselor is listed on a national SHIP roster of *unique Ids* issued by CMS.

(b) If section II A.1 above is met, the CSR will ask questions to verify the identity of the beneficiary, i.e., full name, DOB, Medicare number, and one additional piece of information, e.g., address, phone number, effective date (s) of Medicare A and/or B.

(c) If section II A.2. above is met, the CSR will ask questions to verify the identity of the SHIP counselor, i.e., her/his full name, State program name of the SHIP, and State from which they are calling. The CSR will also ask questions to verify the identity of the beneficiary, i.e., full name, DOB, Medicare number, and one additional piece of information, e.g., address, phone number, effective date(s) of Medicare A and/or B.

(d) If neither II A1. nor A2. above are met, 1-800-MEDICARE, and participating Medicare Advantage and Part D Plan Sponsor CSRs are instructed **NOT** to disclose any information pertaining to a Medicare beneficiary to a SHIP director /counselor/ volunteer (counselor).

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(e) (e) NOTE: These procedures do NOT replace nor supersede those situations where a Medicare beneficiary

1. Is speaking with a counselor in the SHIP office and is able to speak to the CSR to verify disclosure authorization, or
2. Calls the SHIP and the counselor, in turn, bring the CSR into the call and the CSR confirms authorization while on that 3-way call.

(3) Assigning SHIP Counselor Unique Ids

CMS has developed a nomenclature for State-specific SHIP counselor unique identifiers. The *unique ID* is a semi-intelligent, 7-character authorization code. The first two positions of this code are alpha characters that denote the United States Postal Service recognized two-letter State abbreviation. The remaining five characters are numeric and are automatically generated via SHIPTalk.org. The ID along with other qualifying information about the counselor (see section II C above), allows the CSRs to disclose certain beneficiary eligibility and claims payment-specific information to the SHIP Director or counselor when sections II A.1. or II A.2. and II B. above are met.

The SHIP Director is responsible to directly register, via SHIPTalk.org (Admin>User>Add User), those key counselors whom they authorize to contact the Call Centers. Since the information to be disclosed is personally identifiable information, key counselors must be those that are held accountable to the standards to protect the privacy and confidentiality of the information that is disclosed to them. Upon registration, the SHIPTalk.org will automatically generate a *unique ID* to be used only by the specific registered counselor.

After registering all key counselors, the SHIP Director is responsible to download (as necessary) their registry roster and personally and verbally convey the *unique ID* to each counselor to whom a *unique ID* is assigned. Before conveying the *unique ID* to a respective SHIP counselor, the SHIP Director is responsible to have a protocol in place requiring a SHIP counselor to sign a written statement that she/he understands their accountability for the *unique ID* and that it is not to be shared with others.

The SHIP Director is responsible to ensure that their SHIPTalk.org *unique ID* registry roster is kept confidential. The SHIP Director is responsible to keep the SHIPTalk.org registry current.

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The SHIP Director is responsible for confirming bi-annually to CMS (via email) that SHIP counselors (paid and volunteer) who have been assigned a *Unique ID* have signed a confidentiality agreement stating they have been trained in privacy. This document must be kept on file in the SHIP Director's office. CMS will send a reminder to SHIP Directors when the confirmation is due.

The SHIP Director is responsible to delete a counselor's registration data from the registry file within 2 working days after a counselor leaves the SHIP or no longer has 1-800-MEDICARE, Medicare Advantage and Part D Plan Sponsor responsibilities; and, to notify CMS of the deletion via email to ship@cms.hhs.gov. Deleted *unique IDs* will be retired and not re-generated for future use. Deletions will occur during the next scheduled monthly download.

(4) Downloads of *Unique Ids*

Monthly (the last Thursday of each month), CMS Division of SHIP Relations will download the complete SHIP *unique ID* registry file from SHIPTalk.org and forward the complete data to appropriate channels to update the call center SHIP roster information.

SHIP Directors may update the registry file as necessary between monthly downloads. However, the updates will not be recognized or forwarded to 1-800-MEDICARE, Medicare Advantage and Part D Sponsors until the next scheduled monthly download. The CSR will recognize the new registry file approximately 1 week following the CMS monthly download.

CMS will provide all 1-800-MEDICARE, and participating Medicare Advantage and Part D Sponsors a "national" SHIP roster of *unique IDs*.

5) Privacy and Confidentiality

Per the SHIP grant terms and conditions, the authorized SHIP counselors are accountable to adhere to protecting the privacy and confidentiality of any information that is disclosed to them by the beneficiary and Medicare contractors.

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Policy and Procedures for How SHIP Counselors Will Keep Track of the Kinds of Problems that Medicare Beneficiaries Have

The Gateway Benefits Counselor will keep track of the types of problems that Medicare Beneficiaries have. The following procedures will be used:

- Data will be collected on clients receiving counseling and advisory services or other brief services.
- A computerized data file (KEMPS) will be completed indicating the type of services provided, the age and ethnic background of the client, intake and closure dates, the county in which the individual resides, and the manner in which the case is disposed.
- The Gateway Benefits Counselor Coordinator will document on the computerized data file (KEMPS) form the different types of problems Medicare beneficiaries' experience.
- The Gateway Benefits Counselor Coordinator will document the type of services provided on the quarterly reporting form.
- The Gateway Benefits Counselor will maintain a listing of all individuals who normally request services including those who were denied due to not meeting program eligibility.
- This list will be available to the Gateway Area Development District/AAAIL for monitoring purposes.

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Policy and Procedures for Providing Assistance in Applying for Benefits to Older Individuals with Greatest Economic Need

The Gateway Area Development District Area Agency on Aging and Independent Living and services providers' staff provide assistance in applying for benefits to older individuals with greatest economic need. The following procedures will be utilized.

- Gateway Benefits Counseling will provide outreach services at locations that are accessible to the most economically and socially needy senior citizens, including low income minority individuals, institutionalized, homebound, rural, frail, older persons with severe disabilities, older persons with limited English speaking ability, Native American Indians and older persons with Alzheimer's or related disorders and isolated persons.
- The service provider will provide counsel, advice and referral to elderly individuals regardless of their financial status. Older individuals are not required to disclose information regarding their income and resources to obtain these services.
- The service provider will implement a telephonic intake and hotline project to increase the number of individuals assisted and to refer clients to appropriate staff and volunteers.
- The Gateway Benefits Counseling Coordinator will be available to evaluate, counsel, advice, and refer individuals regarding their benefits problems.
- Administrative representation will be available in the areas of Medicare, Medicare Supplemental Insurance, the Medicare Prescription Drug Program, Long Term Care Insurance, QMB, SLMB, Q1, Spend Down Medicaid, Black Lung, Social Security, SSI, Patient Prescription Drug Program, Food Stamps, Veteran's Benefit, and other public benefits.
- In some cases, benefits problems may require a full interview and evaluation by a benefits counselor. In these situations, an appointment will be set up by the program's Gateway Benefits Coordinator will fully evaluate, counsel, advise, refer, negotiate, and when necessary, represent individuals in the court of law.

Gateway Area Agency on Aging and Independent Living Policy Manual and Operating Procedures

- The senior centers, case managers and other service providers are trained to assist with benefits counseling and have extensive knowledge of numerous resources in the communities. All service providers will assist with applying for benefits for the elderly. All service providers will check with individual clients to follow up to see if the referral agencies provided appropriate assistance. If there is a particular problem encountered by the service provider that they feel unqualified to handle and requires more intensive services such as legal assistance, then the client is referred to Gateway contracted Kentucky Legal Aid staff.

Gateway Area Agency on Aging and Independent Living Policy Manual and Operating Procedures

Policy and Procedures for How Those who are on Medicare, Homebound by reason of Illness, Incapacity, Disability, or otherwise Isolated will be Identified and Served.

- The Gateway AAAIL and the service providers ensure that all individuals have equal access to services regardless of their degree of mobility or disability. The following procedures will be utilized:
- Benefits Counseling Information will be provided over the telephone as an effective method of providing assistance to individuals who are unable to travel.
- If an individual is homebound or incapacitated, the Gateway benefits counselor will meet with them in their homes or other appropriate locations identified by the individual.
- Outreach services will be provided at handicapped accessible sites and arrangements will be made to meet with homebound individuals at their residences.
- All applicants are screened to determine the existence of any disability necessitating special program services.
- The senior centers, case managers, and other volunteers are trained to assist with the benefits counseling and have extensive knowledge of numerous resources in the communities.