

Notice of Funding Opportunity

Application due July 8, 2024










Cooperative Agreement to Support Navigators in Federally-Facilitated Exchanges

Opportunity number: CMS-NAV-24-001



Contents

Before you begin	<u>3</u>
 Step 1: Review the Opportunity	<u>4</u>
Basic information	<u>5</u>
Eligibility	<u>7</u>
Program description	<u>10</u>
 Step 2: Get Ready to Apply	<u>23</u>
Get registered	<u>24</u>
Find the application package	<u>24</u>
 Step 3: Prepare Your Application	<u>25</u>
Application contents and format	<u>26</u>
 Step 4: Learn About Review and Award	<u>47</u>
Application review	<u>48</u>
Award notices	<u>55</u>
 Step 5: Submit Your Application	<u>56</u>
Application submission and deadlines	<u>57</u>
 Step 6: Learn What Happens After Award	<u>60</u>
Post-award requirements and administration	<u>61</u>
 Contacts and Support	<u>64</u>
Endnotes	<u>66</u>



Before you begin

If you believe you are a good candidate for this funding opportunity, secure your [SAM.gov](#) and [Grants.gov](#) registrations now. If you are already registered, make sure your registration is active and up-to-date.

SAM.gov registration (this can take several weeks)

You must have an active account with SAM.gov. This includes having a Unique Entity Identifier (UEI).

[See Step 2: Get Ready to Apply](#)

Grants.gov registration (this can take several days)

You must have an active Grants.gov registration. Doing so requires a Login.gov registration as well.

[See Step 2: Get Ready to Apply](#)

Apply by July 8, 2024

Applications are due by 11:59 p.m. Eastern Time on July 8, 2024.



To help you find what you need, this NOFO uses internal links. In Adobe Reader, you can go back to where you were by pressing Alt + Left Arrow (Windows) or Command + Left Arrow (Mac) on your keyboard.



Step 1: Review the Opportunity

In this step

Basic information	5
Eligibility	7
Program description	10

Basic information

Centers for Medicare & Medicaid Services (CMS)

Center for Consumer Information and Insurance Oversight (CCIIO)

Funding organizations that serve as Navigators in states with a Federally-facilitated health insurance exchange.

Summary

Each year, the Centers for Medicare & Medicaid Services (CMS) awards funding to organizations serving as Navigators in states with a Federally-facilitated Exchange (FFE). Navigators help people (consumers) access health insurance through their state's FFE.

Funded organizations operate as Navigators year-round, using funding from CMS to conduct outreach and education in their communities. They raise awareness among uninsured consumers about the coverage options available to them, help consumers find affordable coverage that meets their needs, and assist them beyond the enrollment process. Navigators make sure consumers have the tools and resources they need to use and maintain their health coverage all year, including help with unauthorized enrollment or switching health plans.

Navigators are required to provide targeted assistance to underserved and vulnerable populations within their state's FFE. We refer to these populations throughout this NOFO as [priority populations](#). This targeted assistance is critical to improving access to health care coverage for communities that have been historically disenfranchised and disproportionately impacted by significant health disparities.^[1] We encourage applications from organizations that are members of, or have a history of trusted ties within, the communities and populations they will serve as Navigators, if awarded funding. This goal is in line with [Executive Order 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#).

Have questions?



See [Contacts and Support](#).

Key facts

Opportunity Name:
Cooperative Agreement to Support Navigators in Federally-Facilitated Exchanges

Opportunity Number:
CMS-NAV-24-001

Federal Assistance Listing:
CFDA 93.332

Statutory authority number:
Affordable Care Act (ACA), sections 1311(d)(4)(K), 1311(i), and 1321(c)(1)

Key dates

Application deadline:
July 8, 2024, by 11:59 pm EST

Expected award date:
Friday, August 23, 2024

Expected start date:
Tuesday, August 27, 2024

Funding details

Type: Cooperative agreement, which means that you and CMS will have a role in the project. Throughout the life of your project, we will be there to help and work with you.

Expected total funding for the program: \$500M total over five years, subject to availability of funds.

Expected total awards: Up to 120.

Funding range per [FFE state](#) for the period of performance: \$6.25M to \$84M over five years.

We will provide funding in five budget period increments of 12 months each over a five-year period of performance.

Eligibility

Who can apply

Eligible applicants

The following types of organizations may apply:

Government organizations

- State governments.
- County governments.
- City or township governments.
- Special District governments.
- Native American tribal governments (federally recognized).
- Native American tribal organizations (other than federally recognized tribal governments).

Education organizations

- Independent school districts.
- Public and state-controlled institutions of higher education.
- Private institutions of higher education.

Nonprofit organizations

- Nonprofits having a 501(c)(3) status with the IRS, other than institutions of higher education.
- Nonprofits that do not have a 501(c)(3) status with the IRS, other than institutions of higher education.
- Community and consumer-focused nonprofit groups.

Other organizations

- For-profit businesses.
- Small businesses.
- Individuals.
- Other entities capable of meeting the program requirements, including but not limited to:
 - Trade, industry, and professional associations.

- Commercial fishing industry organizations.
- Ranching and farming organizations.
- Chambers of commerce.
- Unions.
- Resource partners of the Small Business Administration.
- State or local human service agencies.

Consortium applicants

You may apply under one application as a consortium to reach a larger total portion of the [priority populations](#) within FFE states.

A consortium, for the purposes of this funding opportunity, refers to two or more individuals, two or more private or public organizations, or a combination of individual(s) and private or public organization(s) that have identified a lead recipient to serve as the primary applicant and recipient of federal funding. As the identified lead recipient, you will also serve as a “pass-through” entity, issuing subawards or contracts, to consortium members carrying out Navigator duties. Recipients must serve as the primary contact to CMS and will be responsible for monitoring the performance of its consortium members, ensuring they comply with all the requirements and terms and conditions established under this cooperative agreement.

Other eligibility criteria

Funding under this NOFO is only available to eligible individuals, entities, and consortia proposing to operate as FFE Navigators in a state with an FFE for Plan Year (PY) 2025. See [Table 1: State funding allocations](#) for additional information.

Eligibility limitations

You are ineligible for funding under this funding opportunity if you or your organization are:

- Health insurance issuers.
- Subsidiaries of health insurance issuers.
- Issuers of stop loss insurance and their subsidiaries.
- Associations that include members of, or lobby on behalf of, the insurance industry.
- Recipients of any direct or indirect consideration from any health insurance issuer or issuer of stop loss insurance in connection with the

enrollment of any individuals or employees in a qualified health plan (QHP) or non-QHP.[\[2\]](#)

You may submit only one application under this NOFO. Each applicant is eligible for only one cooperative agreement award, so long as the FFE state in which they are awarded cooperative agreement funds remains an FFE.

Cost sharing

This program has no cost-sharing requirement. If you choose to include cost-sharing funds, we will not consider it during review. However, we will hold you accountable for any funds you add, including the requirements for grant reporting.

Program description

Purpose

The purpose of this funding opportunity is to provide funding to eligible individuals or organizations to operate as Navigators in [states with an FFE](#), as authorized by the Affordable Care Act (ACA).^[3]

Background

Section 1311(i) of the ACA requires Exchanges (more commonly called Marketplaces) to establish a Navigator program. This funding opportunity is open to [eligible entities and individuals](#) (described in Section 1311(i)(2) of the ACA and 45 C.F.R. §155.210(a) and (c)) applying to serve consumers in states with an FFE. The Navigator program has been in operation since 2013. Organizations and individuals cannot serve as Navigators without receiving funding through this NOFO. To learn more about the Navigator program, please read the [CMS guide to in-person assistance in the health insurance marketplaces](#).

Program requirements

You must be capable of carrying out, at a minimum, all [required Navigator duties](#). You also have to follow all the [cooperative agreement terms](#) of your award.

Required Navigator duties

If your application is funded, you must perform all required Navigator functions as outlined in the [ACA](#) and HHS regulations at 45 C.F.R. §§ [155.210](#) and [155.215](#). These functions include, but are not limited to:

- Conduct public education activities to raise awareness about the Exchange.
- Provide information and services in a fair, accurate, and impartial manner.
- Facilitate selection of a QHP.
- Provide information in a manner that is culturally and linguistically appropriate to the needs of the population served by the Exchange, including individuals with limited English proficiency, and ensure accessibility and usability of Navigator tools and functions for individuals with disabilities.

- Provide referrals to any applicable office of health insurance consumer assistance or health insurance ombudsman established under section 2793 of the Public Health Service Act, or any other appropriate state agency or agencies, for any enrollee with a grievance, complaint, or question regarding their health plan, coverage, or a determination under such plan or coverage.
- Comply with applicable training and conflict of interest standards.
- Obtain the authorization of applicants for coverage available through an Exchange application prior to accessing their personally identifiable information (PII).
- Assist consumers with complex cases, coverage to care issues, general tax information related to the Exchange, exemptions, and appeals. Navigators cannot act as tax advisers, attorneys, or give tax or legal advice.
- Provide targeted assistance to underserved or vulnerable populations (referred to throughout this funding opportunity as [priority populations](#)), as identified by the Exchange, within the Exchange service area.

About priority populations

For purposes of this funding opportunity, the term priority populations refers to members of communities that have been historically disenfranchised and disproportionately impacted by health disparities and inequities. Priority populations are often affected by social determinants of health (SDOH), such as geographic location, gender, and sexual orientation. They are also frequently impacted by health-related social needs (HRSNs), such as housing instability, housing quality, food insecurity, and lack of employment, personal safety, transportation, and affordable utilities. All of these factors can have a major impact on people's health, well-being, and quality of life.^[4]

Examples of priority populations include:

- Racial and ethnic minorities.
- Rural communities.
- Lesbian, gay, bisexual, transgender, queer, and other LGBTQ+ individuals.
- Low-income or unhoused individuals.
- American Indian and Alaska Native (AI/AN) individuals.
- People with physical or intellectual disabilities.
- Individuals with cognitive, hearing, speech, and/or vision impairments.
- Pregnant women, new mothers, and women with children.

- Individuals with mental health or substance-related disorders.
- Individuals with HIV/AIDS.
- Medicaid-eligible consumers who are not enrolled in coverage despite being eligible for Medicaid.

Prohibited Navigator activities

As a Navigator awardee, you **must not** do any of the following:

- Receive any consideration directly or indirectly from any health insurance issuer or issuer of stop loss insurance in connection with the enrollment of any individuals or employees in a QHP or a non-QHP.^[5]
- Charge any applicant or enrollee, or request or receive any form of remuneration from or on behalf of an individual applicant or enrollee, for application or other assistance related to Navigator duties.^[6]
- Compensate individual Navigators on a per-application, per-individual-assisted, or per-enrollment basis.
- Provide gifts^[7] of any value to any applicant or potential enrollee^[8] as an inducement for enrollment.
- Provide gifts to any applicant or potential enrollee for purposes other than inducement for enrollment that exceed the nominal value,^[9] either individually (\$15 per consumer) or in the aggregate (multiple items totaling less than \$15), when provided to that individual during a single encounter.^[10]
- Use Exchange funds to purchase gifts or gift cards, or promotional items that market or promote the products or services of a third party, that would be provided to any applicant or potential enrollee in coverage available through the Exchange.
- Initiate any telephone call to a consumer using an automatic telephone dialing system or an artificial or prerecorded voice (frequently referred to as “robo-calls”), except in cases where the individual Navigator or Navigator entity already has a relationship with the consumer, the consumer gave prior consent, and this method complies with any applicable state laws.^[11]
- Act as a tax adviser, attorney, or give tax or legal advice.

Required Navigator training

- Before assisting consumers or carrying out any Navigator activities (including outreach and education), all Navigators must successfully complete a CMS-approved training and pass an online exam to be federally certified.
- After initial certification, all Navigators must complete continuing education and be recertified on an annual basis.
- FFE Navigators must also comply with any state-specific certification requirements, so long as they do not prevent the application of the provisions of Title I of the ACA.^[12]

We provide additional guidance on the training, certification, and recertification requirements and procedures for FFE Navigators through the annual Enrollment Assistance Bulletin. The most recent version is the [CMS Enrollment Assistance Bulletin, 2023-01](#).

Referrals and consumer assistance

- You must ensure your Navigators are prepared to assist any consumer seeking assistance, even if that consumer is not a member of your organization's approved service area or priority population(s).
- In instances where the consumer is outside of your approved service area, including another FFE, State-based Exchange (SBE), or State-based Exchange on the Federal Platform (SBE-FP), you should make every effort to provide assistance in a timely manner. You should refer the consumer to other resources such as the [Marketplace Call Center](#), [Find Local Help](#) (FLH), or other assister organizations such as [certified application counselor designated organizations \(CDOs\)](#). If the consumer requests to work with an agent or broker, refer them to a list of licensed agents and brokers in their area or to [FLH](#).^[13]

Conflict of interest (COI) requirements

As a Navigator awardee, you must ensure your organization and staff do not have any relationships that could interfere with your ability to provide assistance.

Avoiding conflicts of interest when helping consumers apply for and enroll in coverage as a Navigator includes:

- Providing unbiased outreach and enrollment assistance.

- Providing fair, accurate, and impartial information.
- Ensuring you are not steering consumers towards a certain plan.

Navigator COI requirements apply to both individual Navigators **and** Navigator organizations.^[14] Individuals whom the requirements apply to include but are not limited to:

- **Staff and volunteers** of a Navigator organization who perform work related to Navigator program activities, as well as those who perform Navigator services.
- **Sub-awardees or subcontractors** of a Navigator organization, as well as their staff and volunteers who are performing work related to Navigator program activities or are performing Navigator services.
- Anyone working for a Navigator organization in **roles supervising Navigator program activities**, even if they're not performing on-the-ground application and enrollment assistance.
- Anyone working for a Navigator organization who is **engaged in Navigator outreach and education activities**.

Staff at your organization who are in no way involved with the organization's Navigator program are not required to comply with Navigator COI requirements.

Prohibited conflicts of interest

The following are all prohibited conflicts of interest:

- Being a health insurance issuer.
- Being a subsidiary of a health insurance issuer.
- Being an issuer of stop loss insurance or their subsidiary.
- Being a part of an association that includes members of, or lobbies on behalf of, the insurance industry.
- Receiving any direct or indirect consideration from any health insurance issuer or issuer of stop loss insurance in connection with the enrollment of any individuals or employees in a QHP or non-QHP^[15].

COI attestation

The project narrative section of your application must include a [written attestation](#) that your organization, along with anyone who will perform work related to the organization's Navigator program activities, or who will perform Navigator services for the organization, does not have any of the [prohibited conflicts of interest](#).

Prior to making this attestation, it is important to carefully evaluate the relationships of anyone for whom the Navigator COI requirements apply. These relationships may include family, friendships, financial relationships, or other factors that could compromise an individual's ability to perform Navigator duties.

You're encouraged to review the [Assister Conflict of Interest Requirements Job Aid](#) for additional information and guidance on COI requirements applicable to Navigators.

COI disclosures

Certain relationships are not a barrier to serving as a Navigator. However, organizations must disclose [non-prohibited relationships](#) to both CMS and each consumer seeking assistance from a Navigator.^[16]

This disclosure must be in plain language and inform the consumer that the Navigator, their Navigator organization, or anyone who performs work related to the organization's Navigator program activities or who performs Navigator services for the organization has one of the non-prohibited relationships.

Relationships that require disclosure

Examples of non-prohibited relationships that require disclosure include:

- Any lines of insurance business (typically non-health-related insurance such as auto, life, and homeowners' policies) that the Navigator or their organization intend to sell while serving as a Navigator.^[17]
- Any existing employment relationships or any former employment relationships within the last five years with any health insurance issuers or issuers of stop loss insurance or subsidiaries of health insurance issuers or issuers of stop loss insurance.^[18]
- Any financial, business, or contractual relationships that the person or organization has with a health insurance issuer or issuer of stop loss insurance or subsidiaries of health insurance issuers or issuers of stop loss insurance.^[19]

COI plan

As a Navigator awardee, you will be required to submit a COI plan. Your COI plan must outline how you'll remain free of prohibited COIs while carrying out Navigator duties, as well as how you will disclose any non-disqualifying relationships to CMS and consumers.^[20]

Your organization's COI plan will be due within 30 days of award and we will provide additional guidance on the required components of the COI plan.

Technical assistance and information for applicants

There will be two sessions designed to provide technical assistance for potential applicants. These sessions will provide you with an overview of this project, provide budget guidance, and review the application instructions outlined in this NOFO. We encourage you to submit questions in advance of each session to Navigatorgrants@cms.hhs.gov.

Technical Assistance Session #1

You can join the session at [CMS's Zoom site](#).

- Thursday, June 13, 2024, from 2 to 3 pm ET
- Meeting ID: 160 924 9299
- Password: 294113

Technical Assistance Session #2

You can join the session at [CMS's Zoom site](#).

- Tuesday, July 2, 2024, from 2 to 3 pm ET
- Meeting ID: 161 815 5550
- Password: 829693

Cooperative agreement terms

All awards under this NOFO will be structured as cooperative agreements. Cooperative agreements require substantial CMS project involvement after an award is made. There are specific roles for both you and CMS. We may be in contact at least once a month, and more frequently when appropriate.

Your responsibilities

- Comply with the terms and conditions of the award.
- Ensure timely access to all CMS-required systems by key personnel.
- Attend and take part in CMS-sponsored onboarding, meetings, and technical assistance trainings.
- Collaborate with CMS staff to implement and monitor the project.
- Immediately notify CMS of needed or anticipated modifications to your approved project plans.
- Implement or leverage an existing data collection system to collect and track program data.

- Implement or leverage existing scheduling tools for scheduling 1:1 enrollment assistance appointments between consumers and Navigators.
- Submit the performance measures requested.
- Submit all required performance assessments, evaluations, and programmatic and financial reports included in the terms and conditions to CMS.
- Attend and take part in routine monitoring calls with the CMS project officer or grants management specialist on progress and challenges. The meetings will include key personnel and the project officer.

Our responsibilities

- Monitor the project's performance and progress.
- Collaborate with you and provide substantial project planning, implementation, and evaluation input.
- Provide substantial input in evaluation activities.
- Make recommendations for continuing the project.
- Review and approve website content before launch and updates.
- Review and approve all key personnel, such as the Authorized Organizational Representative (AOR) and Project Director (PD). [\[21\]](#)
- Maintain regular communication with you through at least monthly conference calls along with technical assistance and consultation.
- Review and approve Conflict of Interest (COI) plan.
- Review and provide feedback on all required performance assessment reports.
- Review and approve all required submitted data.
- Provide a structured approach to sharing, integrating, and actively applying improvement concepts, tactics, and lessons learned.

Substantial involvement relates to programmatic involvement, not administrative oversight.

Funding policies and limitations

State funding allocations

- Funds awarded in Year 1 of the five-year period of performance will cover the first 12-month budget period (August 27, 2024 to August 26, 2025). You must submit an estimated budget for each budget period (Years 1

through 5), using the funding allocations for the FFE state(s) you are proposing to serve.

- For the first 12-month budget period, each FFE state will receive an apportionment of the \$100M in total available funding in the amounts listed in [Table 1: FFE state funding allocations](#). A minimum of \$1.25M will be available per FFE state.
 - If you are selected for an award under this funding opportunity, you will be required to submit an annual [non-competing continuation](#) (NCC) for continued funding of your award for each of the remaining budget periods.^[22]
 - In [subsequent funding cycles](#), awardees may receive decreased funding, or their cooperative agreement could be terminated, due to poor performance.
- The total funding available to applicants in each FFE state takes into account that Navigators will be working with uninsured individuals, as well as consumers currently enrolled in QHP coverage.
 - The amount of funding you're requesting for each 12-month budget period should be proportional to the scope and breadth of the activities you propose and the portion of the FFE state(s) you plan to operate in as a Navigator.
 - You may not apply for more than the maximum amount allocated for the FFE state(s) you are proposing to serve.
 - When making awards, CMS reserves the right to reduce the budget requested or partially fund proposed activities, based on the review of expected activities, the reasonableness of the proposed budget, and the availability of remaining funds for the FFE state for which an award is made.^[23]

Funding example

If you are proposing to serve the entire state of Alaska, you could apply for the entire amount of funding (\$2M) apportioned to the state for each 12-month budget period.

If you are only proposing to serve a portion of the state of Alaska (for example, the county of Anchorage) your project should apply for less than the total amount of appropriated funds in the FFE state, allowing multiple applicants (if available) to be selected for an award in the state of Alaska.

Table 1: FFE state funding allocations

FFE state	Total number of eligible uninsured population ^[24]	FFE QHP selections (PY 2024) ^[25]	Total funding available to FFE state (Budget Year 1)
Alabama	447,900	386,195	\$3,000,000
Alaska	76,300	27,464	\$2,000,000
Arizona	769,100	348,055	\$3,500,000
Delaware	56,000	44,842	\$1,500,000
Florida	2,495,000	4,211,902	\$13,792,500
Hawaii	50,300	22,170	\$1,250,000
Illinois	825,900	398,814	\$5,300,000
Indiana	465,200	295,772	\$2,300,000
Iowa	133,800	111,423	\$1,250,000
Kansas	254,400	171,376	\$3,000,000
Louisiana	333,100	212,493	\$2,500,000
Michigan	470,700	418,100	\$3,715,000
Mississippi	335,600	286,410	\$2,500,000
Missouri	528,000	359,369	\$4,300,000
Montana	89,800	66,336	\$1,250,000
Nebraska	129,400	117,882	\$1,250,000
New Hampshire	65,000	65,117	\$1,500,000
North Carolina	1,001,600	1,027,930	\$7,500,000
North Dakota	50,700	38,535	\$1,250,000
Ohio	693,000	477,793	\$3,100,000
Oklahoma	488,600	277,436	\$3,100,000
South Carolina	480,800	571,175	\$1,250,000
South Dakota	74,700	52,974	\$1,600,000
Tennessee	678,000	555,103	\$4,300,000

FFE state	Total number of eligible uninsured population ^[24]	FFE QHP selections (PY 2024) ^[25]	Total funding available to FFE state (Budget Year 1)
Texas	5,032,400	3,484,632	\$16,792,500
Utah	273,900	366,939	\$1,250,000
West Virginia	116,600	51,046	\$1,250,000
Wisconsin	320,300	266,327	\$3,200,000
Wyoming	67,700	38,565	\$1,500,000

Limitations

We do not allow the following costs:

- Pre-award costs.
- Meeting matching requirements for any other federal funds or local entities.
- Services, equipment, or supports that are the legal responsibility of another party under federal, state, or tribal law, such as vocational rehabilitation or education services, or under any civil rights laws, such as modifying a workplace or providing accommodations that are obligations under law.
- Goods or services not allocable to the project.
- Supplanting existing state, local, tribal, or private funding of infrastructure or services, such as staff salaries, etc.
- Construction.
- Capital expenditures for improvements to land, buildings, or equipment that materially increase their value or useful life as a direct cost, except with our prior written approval.
- The cost of independent research and development, including their proportionate share of indirect costs (see [45 C.F.R. 75.476](#)).
- Funds related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or executive order.
- Certain telecommunications and video surveillance equipment (see [2 C.F.R. 200.216](#)).
- Meals, unless in limited circumstances such as:
 - Subjects and patients under study.

- Where specifically approved as part of the project or program activity, such as in programs providing children’s services.
- As part of a per diem or subsistence allowance provided in conjunction with allowable travel.
- Costs to provide direct health care services to individuals.
- Cost that supplant funds provided under Funding Opportunity CA-NAV-21-001, entitled “Cooperative Agreement to Support Navigators in Federally-facilitated Exchanges.”
- Costs that supplant funds for any other Notice of Funding Opportunity or Financial Assistance Program.
- Costs of carrying out services that are the responsibility of the Exchange, such as eligibility determinations and transferring enrollment information for consumers to a QHP.
- Assistance for consumers residing in a SBE or SBE-FP state or in a state the Navigator has not been awarded cooperative agreement funding to serve.
- Staff retreats or promotional giveaways.
- Gifts or gift cards, or promotional items that market or promote the products or services of a third party, that would be provided to any applicant or potential enrollee.

Other than for normal and recognized executive-legislative relationships or participation by an agency or officer of a state, local, or tribal government in policymaking and administrative processes within the executive branch of that government, funding awarded under this NOFO **may not be used for:**

- Paying the salary or expenses of any grant recipient, or agent acting for such recipient, related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or executive order proposed or pending before the Congress or any state government, state legislature, or local legislature or legislative body.
- Lobbying, but awardees can lobby at their own expense if they can segregate federal funds from other financial resources used for lobbying.

Indirect costs

Indirect costs are those for a common or joint purpose across more than one project and that cannot be easily separated by project. Learn more at [45 C.F.R. 75.414](#), Indirect Costs.

To charge indirect costs you can select one of two methods:

Method 1 – Approved rate. You currently have an indirect cost rate approved by your cognizant federal agency.

Method 2 – *De minimis* rate. Per [45 CFR 75.414\(f\)](#), if you have never received a negotiated indirect cost rate, you may elect to charge a *de minimis* rate. If you are awaiting approval of an indirect cost proposal you may also use the *de minimis* rate. If you choose this method, costs included in the indirect cost pool must not be charged as direct costs.

This rate is 10% of modified total direct costs (MTDC). See [45 CFR 75.2](#) for the definition of MTDC. You can use this rate indefinitely.

Statutory authority

Affordable Care Act (ACA), Sections 1311(d)(4)(K), 1311(i), and 1321(c)(1).



Step 2:

Get Ready to Apply

In this step

Get registered	24
Find the application package	24

Get registered

SAM.gov

You must have an active account with SAM.gov. This includes having a Unique Entity Identifier. SAM.gov registration can take several weeks. Begin that process today.

To register, go to [SAM.gov Entity Registration](#) and click Get Started. From the same page, you can also click on the Entity Registration Checklist for the information you will need to register.

Grants.gov

You must also have an active account with [Grants.gov](#). You can see step-by-step instructions at the Grants.gov [Quick Start Guide for Applicants](#).

Need Help? See [Contacts and Support](#).

Find the application package

The application package has all the forms you need to apply. You can find it online. Go to [Grants Search at Grants.gov](#) and search for opportunity number CMS-NAV-24-001.



Step 3:

Prepare Your Application

In this step

Application contents and format

26

Application contents and format

Applications include five main components. The following sections include guidance and instructions on the required format for each.

You can find all referenced forms within the funding opportunity's [application package on grants.gov](#).

Make sure you include each of these:

Component	Submission Format
Project abstract	Use the Project Abstract Summary form
Project narrative	Use the Project Narrative Attachment form
Budget narrative justification	Use the Budget Narrative Attachment form
Attachments	Insert each in the Other Attachments form
Other required forms	Upload using each required form.

We will provide instructions on document formats in the sections below.

Project abstract

Limit to one page. May be single spaced, but follow other formatting requirements listed for the [project narrative](#).

Write a one-page summary of your proposed project including the purpose and outcomes. Do not include any proprietary or confidential information. We will use this document for information sharing and public information requests if you get an award.

Include:

- The name of your organization.
- Consortium name, if applicable.
- The names of any subrecipients or sub-awardee organizations, if applicable.
- Your [organization type](#), such as:
 - Community and consumer-focused nonprofit.

- Hospital or clinic.
- Small business.
- State or local human services agency.
- Trade, industry, or professional association.
- Tribe or tribal organization.
- University or institution of higher education.
- Annual funding amounts for each 12-month budget period (Years 1 through 5).
- Name of the FFE state(s), specifying whether you'll be operating statewide or in a portion of the state.
 - If not operating statewide, include an alphabetized list of which counties you will operating in.
- Proposed [priority population\(s\)](#) you plan to serve.
- Total number of Navigator staff your organization or consortium will have federally trained and certified or re-certified for PY 2025 **by October 1, 2024.**

Project narrative

Required format for project narrative

Page limit: 25, excluding attachments

File name: Project Narrative

Format: PDF (Do not compress or encrypt.)

Size: 12-point font or bigger

Footnotes and text in graphics may be 10-point.

Spacing for project abstract, tables, and footnotes: Single-spaced

Spacing for main content: Double-spaced

Margins: 1-inch

Page size: 8.5 x 11

Include consecutive page numbers throughout.

The project narrative is the most important part of your application and should clearly describe your proposed project. You must address the proposed goals,

measurable objectives, and milestones in accordance with the instructions in the following sections.

See the [merit review criteria](#) to understand how reviewers will assess and score your project narrative.

Your project narrative should include the following seven sections:

- **[Priority populations](#)**: Who are you going to serve?
- **[Proposed activities](#)**: What are you going to do?
- **[Project goals](#)**: What do you expect to achieve?
- **[Capabilities](#)**: Why are you qualified to serve the priority populations?
- **[Work plan and timeline](#)**: What is your action plan to meet the project goals and carry out the proposed activities?
- **[Conflict of interest \(COI\) attestation](#)**: How will you remain free of COIs?
- **[Ensuring privacy and security of consumer personally identifiable information \(PII\)](#)**: What will you do to comply with and monitor PII requirements?

1. Priority populations: Who are you going to serve?

While Navigators should be prepared to assist any consumer seeking assistance, you should focus your project on one or more [priority populations](#), as defined in this funding opportunity. We encourage applications from organizations that are members of, or have a history of trusted ties within, the communities and populations they will serve as Navigators.

You should assess each of your proposed priority population's needs, taking into account:

- The uninsured rate for the proposed priority populations within the state.
- The FFE state and county in which the priority population resides.
 - **Note:** Tribal applicants must specify the proposed tribal population(s) you will serve. List the tribal community (that is, the federally recognized Indian tribes and geographic locations/counties.)

Additional requirements for multi-state applicants

If you are proposing to serve as a Navigator in multiple FFE states, you must also include the following within your project narrative:

- A description of how your efforts will be balanced amongst the various states, based on the needs of the priority populations that you plan to serve.

- Separate [project goals](#) for each FFE state you are proposing to serve.
- A separate [budget narrative](#) for each FFE state.

Resources

- [Healthy People 2030](#) provides additional information on how addressing social determinants of health can reduce health disparities and maintain healthy communities and populations. Resources include [tools for action](#), [data sources and methods](#), and [research related to specific determinants](#).
- For information on addressing the health care needs of rural, tribal, and geographically isolated communities, see the [CMS Framework for Advancing Health Care in Rural, Tribal, and Geographically Isolated Communities](#).
- See also the report on [Addressing Social Determinants of Health: Examples of Successful Evidence-Based Strategies and Current Federal Efforts](#).

What you need to write

- Say which priority populations you plan to focus your services on.
- Tell us where your priority populations reside.
- Describe the [social determinants of health and health-related social needs \(SDOH and HRSNs\)](#) that contribute to health disparities and disproportionate access to healthcare coverage for members of your priority populations.
- Say why you chose to focus on the selected priority populations and the targeted service areas.

2. Proposed activities: What are you going to do?

Describe your proposed project and how you will carry out all the [required Navigator duties](#). Your project plan must include all of the following subsections:

Providing targeted assistance

Explain your organization's strategy for providing targeted assistance to your chosen [priority populations](#) within the proposed FFE states, while also being prepared to assist any consumer seeking assistance.

Your strategy should:

- Address [SDOH and HRSNs](#) identified within the priority populations.

- Explain the activities you will use to carry out this strategy and why you chose them.
- Describe how your outreach and communication methods are culturally competent and linguistically appropriate for the priority populations.

Conducting education and outreach

Navigators are required to conduct education and outreach activities to raise awareness about the FFE and help consumers understand their health coverage options.

Describe your organization's plans for:

- Conducting education and outreach activities within your targeted service areas.
- Identifying settings and venues to host education and outreach activities. You should explain why these locations are appropriate for reaching your chosen priority populations.
- Using community partnerships to carry out these activities.
- Providing information in a manner that is culturally and linguistically appropriate to the needs of the priority populations and ensuring accessibility and usability of Navigator tools and functions for individuals with disabilities.

Effective June 18, 2023, a regulation change at 45 C.F.R. § 155.210(d)(8) allows Navigators to go door to door or use other unsolicited means of direct contact to provide enrollment assistance to consumers. This change in regulation was made to further eliminate barriers to coverage access by maximizing pathways to enrollment.^[26]

Facilitating selection of a QHP

Navigators are required to provide fair, accurate, and impartial information and services. Your plan should describe how you will:

- Provide information that is fair, accurate, and impartial when assisting consumers with submitting the eligibility application.
- Clarify the distinctions among health coverage options, including QHPs.
- Help consumers make informed decisions during the health coverage selection process.
- Develop or leverage existing scheduling tools to schedule 1:1 enrollment assistance appointments with consumers.

- Leverage CMS systems and coordinate with other FFE assister organizations^[27] operating in your service area to facilitate seamless coverage transitions between Medicaid/CHIP and QHP coverage.
 - For example, you could conduct direct assister-to-consumer outreach to transitioning consumers. You could also receive referrals from other FFE assister organizations operating in your service area to provide 1:1 enrollment assistance to consumers.

Providing post-enrollment information and assistance

To ensure consumers have access to skilled assistance beyond applying for and enrolling in health insurance coverage, Navigators are also required to assist with a variety of post-enrollment activities.

Your plan should describe how you will:

- Help consumers [understand their health coverage and how to use it](#), including accessing care and preventive services.
- Educate consumers about their rights with respect to [essential health benefits](#) available through the Exchange (Marketplace) plans.
- Connect consumers with [consumer assistance programs](#), [appeals programs](#), and [ombudsmen](#) to help with grievances, questions, or complaints, such as those related to unauthorized enrollment or switching of health plans.

What you need to write

- Say **how** you will carry out all the [required Navigator duties](#) and implement the [proposed activities](#).
- Explain the strategy you will use to provide targeted assistance to the priority populations within your proposed FFE states.
 - Tell us **how** your strategy meets the needs of your priority populations, [SDOH and HRSNs](#), and service areas.
 - Tell us **how** your outreach and communication methods will establish reach into communities and individuals you plan to serve.
- Explain the strategy and activities you will use to carry out each component of your proposed project and why you chose them.

3. Project goals: What do you expect to achieve?

Using a similar format to the table shown here, develop project goals for carrying out the required Navigator duties during the first 12-month budget period (August 27, 2024 to August 26, 2025) of your project. Your project goals should be realistic and attainable.

You must consider the following in establishing your project goals:

- Size of the FFE service areas your project will operate in.
- Size and needs of the priority populations you plan to serve.
- Amount of funding you are requesting for the first budget period.

Reminder: If you are proposing to serve multiple FFE states, you should prepare and submit separate project goals for each FFE state.

How your project goals are used

- CMS uses project goals to measure your progress and promote project improvements.
- Prior to the start of each budget period, you will be required to set annual project goals for Years 2 through 5 as part of your annual [non-competing continuation](#) (NCC).
- You will also be required to collect and report performance data to CMS on a weekly, monthly, and quarterly basis in the form of [progress reports](#).
- CMS will use this data to [evaluate your progress](#) towards your project goals and determine the level of funding available to your organization for subsequent budget periods.

What you need to write

- Enter target numbers to represent your project goals for each of the Navigator activities listed in Table 2. Do not alter the descriptions of the project goals.
- The target numbers measure your progress in performing Navigator duties. Set your project goals based on:
 - Key components of your proposed activities.
 - Size of your FFE service areas.
 - Size and needs of your priority populations.
 - Funding received each budget period.

Table 2: Budget Year 1 (2024 to 2025) project goals

Navigator activity	Description of project goal	Target number
Training and certification	<p>Navigator staff to be federally trained and certified or re-certified for PY 2025 by October 1, 2024, broken out as follows:</p> <ul style="list-style-type: none"> • Total number of federally trained and certified or re-certified Navigators. • Portion of Navigators that will be paid full-time (100%) from Navigator funding. • Portion of Navigators that will be paid part-time from Navigator funding, including what percentage of their time will be paid from Navigator funding. • Portion of Navigators that will be volunteers or otherwise not paid from Navigator funding. 	<p>Sample response:</p> <ul style="list-style-type: none"> • 15 Navigators • 8 Navigators • 3 Navigators (2 at 50% and 1 at 25%) • 4 Navigators
Education, enrollment, and post-enrollment assistance	Number of 1:1 interactions between Navigators and consumers (including both general and specific inquiries).	
Enrollment assistance	Number of consumers assisted with enrollment or re-enrollment in a QHP.	
Enrollment assistance	Number of consumers assisted with Medicaid/CHIP applications or referrals.	
Health literacy and education	Number of consumers assisted with understanding the basic concepts and rights related to health coverage and how to use it .	
Post-enrollment assistance: Resolving enrollment issues and referrals	Number of consumers assisted with complex cases, other Exchange (Marketplace) enrollment issues, or referrals.	
Post-enrollment assistance: Tax forms and appeals	Number of consumers assisted with Marketplace forms, exemptions, and appeals.	

Definitions related to project goals

- **1:1 interactions** are direct interactions between Navigators and consumers that may include, but are not limited to:
 - In-person assistance.
 - Assistance provided over the phone.
 - Virtual or video assistance.
 - Other remote assistance, such as email or text.
 - Any other direct interaction that may occur between a Navigator and a consumer where the Navigator provides enrollment or post-enrollment assistance.
- **Assistance with understanding the basic concepts and rights related to health coverage and how to use it** includes, but is not limited to:
 - Providing health insurance literacy.
 - Locating providers covered under health plan.
 - Assisting with health insurance billing and payment questions.
 - Evaluating health care options using tools and information available through a consumer's health plan.
 - Assisting with accessing preventable health services.
- **Assistance with complex cases, other Exchange (Marketplace) enrollment issues, or referrals** includes, but is not limited to:
 - Making [complex case help center referrals](#).
 - Resolving [data matching issues](#) or periodic data matching issues (as in [Medicaid](#) or [Medicare](#)).
 - [SEP eligibility](#).
 - Answering [employer-sponsored coverage questions](#).
 - [APTC/CSR eligibility](#).
 - Referring consumers to [consumer assistance programs](#), [appeals programs](#), and [ombudsmen](#) to help with grievances, questions, or complaints.
- **Assistance with Marketplace forms, exemptions, and appeals** includes, but is not limited to:
 - [Marketplace-related components of the APTC reconciliation process](#), tax forms (1095-A), and understanding the availability of IRS resources on tax forms.

- [Filing Marketplace exemptions.](#)
- Completing or submitting [Marketplace or insurance coverage appeals.](#)

4. Capabilities: Why are you qualified to serve the priority populations?

Community relationships

As trusted community partners, Navigators must be able to leverage community relationships or readily establish collaborations with local organizations and other key stakeholders within the communities they serve. This is vital to improving access to health services, especially for consumers who are members of [priority populations](#).

What you need to write

- Describe your organization's capabilities to carry out your [proposed activities](#), reach your [priority populations](#), and achieve your [project goals](#).
- Describe your current or prior experiences working with your priority populations, including at least one example of how you have successfully included community members or local organizations in a previous project.
- Explain your relationship to your priority populations and the communities you plan to serve as a Navigator. Provide at least two examples that show a trusted relationship with your priority populations and their communities.
- Identify organizations you will partner with to successfully carry out your [project plan](#).
- Additional requirement for consortium applicants:
 - Describe the role each subrecipient organization will have in this project and how their involvement will impact the proposed project plans.

Staffing

All staff and volunteers working as Navigators on this project must complete all [required Navigator training](#) and certification requirements prior to performing any Navigator activities, including outreach and education activities.

As a reminder, your [project goals](#) related to Navigator training and certification and re-certification for Plan Year 2025 must be achieved by **October 1, 2024**. Organizations operating in FFEs with state certification

requirements must also complete state certifications for PY 2025 by **October 1, 2024** for this goal to be considered met.

What you need to write

- Discuss your organization's current staffing capacity.
 - Submit your organization's Navigator training and certification plan, documenting your plans for ensuring operational readiness as an attachment.
 - Submit a recruitment and hiring schedule for onboarding additional Navigator staff (full-time, part-time, and/or volunteers), if needed, as an attachment.
 - You must be able to quickly hire and onboard new staff. The recruitment and hiring schedule should anticipate the demand for services and readiness of Navigator staff to begin delivering services by **October 1, 2024** of the first budget period, and on an ongoing basis throughout the duration of the five-year period of performance.
- Provide a complete list of staff positions for this project, including key personnel.
 - Key personnel are defined as:
 - The authorized organizational representative (AOR).
 - A principal investigator/project director (PI/PD).
 - Any other individuals who contribute to the programmatic development or execution of a project or program in a substantive, measurable way, whether or not they receive salaries or compensation under the grant.
 - For the Navigator program, key personnel must include an AOR and PI/PD. ^[28] Additional program staff positions may include a program manager, training manager, and quality manager/evaluator.
 - If key personnel are working on multiple federal grants, you are required to ensure there is no overlap in their time commitment allocated to each grant (that is, their total commitment time across all grants should not exceed 100%), and that there is no duplication or supplanting of funding.
 - Submit as an attachment the resumes for key personnel positions that are already filled. If you have not filled a position, you may attach the job description with qualifications that you plan to use for recruitment.

- Outline the processes and tools the AOR and PD will use to oversee and monitor the activities proposed in the project narrative and the achievement of project goals.
- Provide an overview of key workforce skills and qualifications. Staff skills and qualifications should include expertise relative to your priority population(s), [project goals](#), and the [required Navigator duties](#).

5. Work plan and timeline: What is your action plan?

Your work plan should address all the components of your [project plan](#): [providing targeted assistance](#), [conducting education and outreach](#), [facilitating selection of a QHP](#), and [providing post-enrollment information and assistance](#). Your work plan should also align with the [project goals](#).

What you need to write

- As an attachment, provide a chart, table, or graph depicting a realistic timeline with goals and objectives that are consistent with those outlined in your proposed [project narrative](#) for the first 12-month budget period.
- See the [work plan attachment](#) section for more details about what to include.

6. Conflict of interest (COI) attestation: Will you remain free of COIs?

Your application must include a written attestation that your organization, along with anyone who will perform work related to the organization's Navigator program activities, or who will perform Navigator services for the organization, does not have any of the [prohibited conflicts](#) of interest^[29] and that you'll remain free of all applicable COIs during your term as a Navigator awardee.

Prior to making this attestation, it is important to carefully evaluate the relationships of anyone for whom the Navigator COI requirements apply. You can use the resources included here to help with this evaluation.

Resources

We encourage you to review the following resources for additional information and guidance on Navigator COI requirements, prohibitions, and required disclosures:

- [Assister Conflict of Interest Requirements Job Aid](#)
- [Assister Conflict of Interest Requirements Webinar Presentation](#)

What you need to write

- Submit a written attestation that the organization and personnel performing Navigator duties do not have any COIs.
- Your attestation must assure CMS that there are no personal interests, including family, friendships, financial relationships, or other factors, that could compromise your ability to perform Navigator duties.

7. Ensuring privacy and security of consumer personally identifiable information (PII): What will you do to comply with PII requirements?

PII is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.

As a Navigator, you must strictly adhere to all applicable [privacy and security terms and conditions](#)^[30] to ensure you are properly safeguarding all consumer PII.

Provide a plan for how your organization will ensure compliance with all applicable privacy and security standards, including appropriate policies and procedures for collecting, protecting, and securing all PII.

What you need to write

Develop a PII plan that outlines the following:

- How you plan to ensure all staff performing Navigator activities (as well as those who have access to sensitive information or PII related to your organization's Navigator activities) comply with [FFE privacy and security standards](#), especially when using computers, laptops, tablets, smartphones, and other electronic devices. Describe how you will assess the qualifications of these staff, including noting whether you will conduct background checks.
- A schedule for monitoring staff completion of all [required training](#) related to privacy and security standards and compliance.
- A mitigation plan for addressing any PII breaches that may occur.
- A process for [obtaining each consumer's authorization](#) before gaining access to their PII.
- How you will provide ongoing monitoring throughout the duration of the project to ensure continued compliance with all privacy and security standards.

Budget narrative

The budget narrative supports the information you provide in Standard Form 424-A. See [other required forms](#). It includes added detail and justifies the costs you ask for. As you develop your budget, consider:

- If the costs are reasonable and consistent with your project's purpose and activities.
- Restrictions on spending funds. See [funding policies and limitations](#).

In your budget narrative, you will:

- Provide an overall estimated budget for the entire five-year period of performance, that is, the total costs across all five years.
- Provide a detailed budget for the first 12-month budget period:
 - Include breakdown of costs for each line item in your SF-424A.
 - Describe the proposed costs for each activity or cost within the line item.
 - Define the proportion of the requested funding designated for each activity.
 - Justify the costs, including how you calculated them.
- Provide a high-level summary of budget costs for Years 2 through 5:

- Estimate the requested amount of funds you will request from CMS each year. For example, \$2M in Year 2 and \$2M in Year 3.
- Explain how you separate costs and funding administered directly by you as the lead agency, from funding you subaward to other consortium members.
- Be clear about how costs link to each activity and the goals of this program.

Additional instructions for multi-state applicants

- If you are proposing to serve as a Navigator in multiple FFE states, you must submit a separate budget narrative for each state.
- Your SF-424A should include the total annual funding requested for each line-item category for all FFE states, as well as an overall total funding request for the five-year period of performance.

Reminder: You may only use funds for [reasonable program purposes](#) consistent with the award and with grant regulations found at [45 C.F.R. 75](#).

To create your SF-424A and budget narrative, see detailed instructions in [CMS Guidance for Preparing a Budget Request and Narrative](#) on our website.

Required format for budget narrative

Page limit: None

File name: Budget Narrative

File format: PDF (Do not compress or encrypt.)

Font Size: 12-point or bigger

Spacing: Single-spaced

Margins: 1-inch

Page Size: 8.5 x 11

Include consecutive page numbers throughout.

Attachments

You will upload attachments in [Grants.gov](https://www.grants.gov) using the Other Attachments Form. Attachments do not count against application page limits.

Do not include additional attachments not requested in the NOFO. Reviewers will not review any attachments that are not listed here.

Work plan

Provide a chart, table, or graph depicting a realistic timeline with goals and objectives that are consistent with those outlined in your proposed [project narrative](#) for the first 12-month budget period.

The work plan should document key activities, associated timeframes, and responsible staff. It must also align with your [project plan](#) and [project goals](#).

The work plan should include:

- **Program goal:** Indicate the overall purpose of your project.
- **Priority populations and proposed FFE service areas:** Indicate who you will serve and where you will provide services.
- **Objective:** Define how your program goal will be achieved through the activities laid out in your project plan.
- **Activities:** Identify the tasks required to achieve your project goals.
- **Target numbers:** Define a numeric threshold for each activity.
- **Timeframes:** Indicate the duration of each activity.
- **Outcomes:** Identify what you will track to measure the success of your activities by the end of the first 12-month budget period (August 27, 2024 to August 26, 2025).

Reminder: All goals and activities submitted in your work plan and timeline should be for the entire 2024 to 2025 budget period (August 27, 2024 to August 26, 2025).

Two sample work plan templates are provided here as optional guides. The templates provide examples of how you can outline different program goals for your work plan for the first 12-month budget period.

Year 1 Work Plan: Sample

Program goal: Provide targeted assistance to support program efforts for outreach, education, and enrollment in health insurance plans.

Priority populations and FFE service area: Black and Latinx individuals residing in rural NC (Mecklenburg and Guilford counties)

Objective: Establish relationships with local healthcare and community organizations to offer and promote Navigator services.

Activities	Target number	Timeframe	Responsible person(s)
Partner with community organizations that focus on reaching Black and Latinx people in Mecklenburg and Guilford counties.	30 organizations	8/27/24 – 8/26/25	Program manager
Publish marketing ads on tv, radio, and print to increase visibility in community.	<ul style="list-style-type: none"> • 3 billboards • 6 radio ads • 8 TV ads 	8/27/24 – 8/26/25	Marketing and social media specialist
Contract with four organizations to form a consortium to support Navigator duties.	4 subcontracts	8/27/24 – 8/26/25	Program director

Outcomes

- # of established partnerships.
- # of co-hosted events.

Year 1 Work Plan

Program goal: Increase knowledge of health insurance coverage options available through the FFMs within the LGBTQ+ communities.

Priority population and FFE service areas: LGBTQ+ individuals residing in the state of Wisconsin.

Objective: Conduct targeted outreach, education, and enrollment activities within the LGBTQ+ communities.

Activities	Target number	Timeframe	Responsible person(s)
Hire and train staff with diverse backgrounds and lived experiences that support outreach, education, and enrollment efforts within the LGBTQ+ communities.	<ul style="list-style-type: none"> • 15 Navigators • 5 Certified Application Counselors 	8/27/24 – 10/1/2024	Program manager, training manager
Conduct outreach and enrollment events in locations where LGBTQ+ individuals gather (e.g. community fairs, college campuses, places of worship, local social establishments, Pride events).	<ol style="list-style-type: none"> 1. 85 OE events 2. 4 live social media events 3. 30 SEP events 	<ol style="list-style-type: none"> 4. 8/27/24 – 1/16/25 5. 8/27/24 – 1/16/25 6. 1/17/25 – 8/26/25 	Navigators
Distribute culturally appropriate educational and marketing materials.	<ul style="list-style-type: none"> • 300 brochures • 100 flyers • 8 tv ads • 45 social media posts 	8/27/24 – 8/26/25	Marketing and social media specialist, Navigators

Outcomes

- % increase in knowledge change in staff trained on cultural humility and sensitivity (pre/post test).
- # of participants at outreach and enrollment events (in-person, virtual).

Indirect cost agreement

- If you include indirect costs in your budget using an approved rate, include a copy of your current agreement approved by your [cognizant agency for indirect costs](#). If you use the de minimis rate, you do not need to submit this attachment. See [CMS Guidance for Preparing a Budget Request and Narrative](#).

Proof of nonprofit status

If your organization is a nonprofit, you need to attach proof. We will accept any of the following:

- A copy of a current tax exemption certificate from the IRS.
- A letter from your state's tax department, attorney general, or another state official saying that your group is a nonprofit and that none of your net earnings go to private shareholders or others.
- A certified copy of your certificate of incorporation. This document must show that your group is a nonprofit.
- Any of the above for a parent organization. Also include a statement signed by an official of the parent group that your organization is a nonprofit affiliate.

Navigator training and certification plan

Your Navigator training and certification plan should demonstrate your organization's operational readiness and ability to ensure all Navigator staff (as defined in your [project goals](#)) are trained and certified or re-certified for Project Year 2025 by October 1, 2024.

If you're applying as a consortium, this plan should include training and certification plans for all Navigator staff, including those at subrecipient locations.

Attach the following:

- An overview of your [planned training and certification activities](#) for all Navigator staff, including:
 - Federal training and certification.
 - State-level training, certification, and/or licensure (if applicable).
 - Organization-specific supplemental trainings or onboarding activities, such as background checks (if applicable) and [privacy and security training](#) to ensure proper handling of consumer PII.

- Your training schedule and target completion dates for all Navigator staff. This should include the completion of all the training, certification, and onboarding activities outlined under the previous bullet.

Note: The Navigator training and certification plan is a living document and should be updated as needed throughout the period of performance to reflect ongoing training and technical assistance offerings.

Recruitment and hiring schedule

Your recruitment and hiring schedule should anticipate the demand for services and readiness of Navigator staff to deliver services by October 1, 2024. You must be able to quickly ramp up operations once awarded, including hiring and onboarding new staff for any vacant key personnel positions, as well as individual Navigators.

Attach an outline of your plans for recruiting, hiring, and onboarding additional Navigator staff (full-time, part-time, and/or volunteers) and key personnel (if applicable) to ensure operational readiness by October 1, 2024.

Resumes and job descriptions for key personnel

For [key personnel](#), such as the authorized organizational representative (AOR) and principal investigator/project director (PI/PD), attach resumes for positions that are filled. If a position isn't filled, attach the job description with qualifications you plan to use for recruitment.

Business assessment of applicant organization

Maximum 12 pages, single spaced.

CMS must assess your organization's risk before we can make an award. This analysis includes your organization's:

- Financial stability.
- Quality of management systems.
- Internal controls.
- Ability to meet the management standards prescribed in [45 C.F.R. Part 75](#).

For us to complete your assessment, you must review, answer, and attach the completed business assessment questions found on our website at [Business Assessment of Applicant Organization](#).

Other required forms

You will need to complete four other required forms. Submit the following required forms through Grants.gov. You can find the form in the [NOFO application package](#) or review them and their instructions at [Grants.gov Forms](#).

Forms	Submission requirement
Application for Federal Assistance (SF-424)	With the application. See extra instructions below.
Budget Information for Non-Construction Programs (SF-424A)	With the application.
Disclosure of Lobbying Activities (SF-LLL)	With the application.
Project/Performance Site Location(s) Form	With the application.

Extra instructions for SF-424: Official Application for Federal Assistance

Special instructions include:

- To write your Descriptive Title of Applicant's Project in Item 15, see [Writing a Strong Descriptive Title](#) on our website.
- Check No to item 19c. State review under [Executive Order 12372](#) does not apply.
- Your [authorized organizational representative \(AOR\)](#) must electronically sign this form. The AOR is the person who can make legally binding commitments for your organization. When the AOR authorizes an application, they agree to assume all award obligations.



Step 4:

Learn About Review and Award

In this step

Application review	<u>48</u>
Award notices	<u>55</u>

Application review

Initial review

We review each application to make sure it is eligible, complete, and responsive. We won't consider an application that:

- Is from an organization that doesn't meet all [eligibility criteria](#).
- Requests funding above the award ceiling in the FFE State(s) they're applying to serve, as shown in the table of [FFE state funding allocations](#).
- Is submitted after the [deadline](#).
- Is not submitted through [Grants.gov](#).

We will not review any pages that exceed the page limit.

According to HHS Grant Policy, the Division of Grants director or deputy director may choose to continue the review process for an ineligible application if it is in the best interests of the government to meet the objectives of the program.

Merit review

A panel reviews all applications that pass the initial review. The panel members use the criteria below. For more information, see [Merit Review and Selection Process](#) on our website.

Scoring criteria summary	Total available points: 200
Project narrative	185 points
1. Priority populations: Who is being served?	15 points
2. Proposed activities: What will this project do?	50 points
3. Project goals: What does this project expect to achieve?	20 points
4. Capabilities: Community Relationships, Qualifications, and Staffing Plans	35 points
5. Work plan and timeline	30 points
6. Conflict of interest (COI) attestation	10 points

Scoring criteria summary	Total available points: 200
7. Ensuring privacy and security of consumer personally identifiable information (PII)	25 points
Budget narrative	15 points

Project narrative section 1 Priority populations: Who is being served?	Maximum points: 15
Clearly defines the priority populations and the targeted service areas (that is, FFE states and counties) for the project.	5 points
Tribal applicants only: Clearly defines the tribal population(s) for the project (that is the federally recognized Indian tribes and geographic locations/counties).	
Describes the SDOH and HRSNs that contribute to health disparities and disproportionate access to healthcare coverage for members the priority populations.	5 points
Explains why you chose the selected priority populations, including references to data used to assess the needs of the priority populations and targeted service areas.	5 points

Project narrative section 2 Proposed activities: What will this project do?	Maximum points: 50
<p><u>Provide targeted assistance</u></p> <ul style="list-style-type: none"> • Clearly explains your strategy for providing targeted assistance to your chosen priority populations within the proposed FFE states. • Explains how you will prepare to assist any consumer seeking assistance. • Your strategy does the following: <ul style="list-style-type: none"> ◦ Addresses SDOH and HRSNs identified within the priority populations. ◦ Explains the activities you will use to carry out this strategy and why you chose them. ◦ Describes how the identified outreach and communication methods are culturally competent and linguistically appropriate for the priority populations. 	10 points

Project narrative section 2 Proposed activities: What will this project do?	Maximum points: 50
<u>Conduct education and outreach</u> Describes your plans for:	15 points total
<ul style="list-style-type: none"> • Conducting education and outreach activities within the targeted service areas. 	4 points
<ul style="list-style-type: none"> • Identifying settings and venues to host education and outreach activities. Explains why these locations are appropriate for reaching the chosen priority populations. 	4 points
<ul style="list-style-type: none"> • Using community relationships and partnerships to carry out these activities. 	4 points
<ul style="list-style-type: none"> • Providing information in a manner that is culturally and linguistically appropriate to the needs of the populations being served, including ensuring the accessibility and usability of Navigator tools and functions for individuals with disabilities. 	3 points
<u>Facilitate selection of a QHP</u> Clearly describes your ability to:	10 points total
<ul style="list-style-type: none"> • Provide information that is fair, accurate, and impartial when assisting consumers with submitting the eligibility application. 	3 points
<ul style="list-style-type: none"> • Clarify the distinctions among health coverage options, including QHPs. 	2 points
<ul style="list-style-type: none"> • Help consumers make informed decisions during the health coverage selection process. 	3 points
<ul style="list-style-type: none"> • Leverage CMS systems and coordinate with other FFE assister organizations operating in your service area to facilitate seamless coverage transitions for consumers as they transition between Medicaid/CHIP and QHP coverage. 	2 points
<u>Provide post-enrollment information and assistance</u> Describes how you plan to:	15 points total
<ul style="list-style-type: none"> • Help consumers understand their health coverage and how to use it, including accessing care and preventive services. 	5 points
<ul style="list-style-type: none"> • Educate consumers about their rights with respect to essential health benefits available through the Exchange (Marketplace) plans. 	5 points

Project narrative section 2 Proposed activities: What will this project do?	Maximum points: 50
<ul style="list-style-type: none"> Connect consumers with consumer assistance programs, appeals programs, and ombudsmen to help with grievances, questions, or complaints, such as those related to unauthorized enrollment or switching of health plans. 	5 points
<p>Multi-state applicants only: Clearly describes how the efforts outlined in this section will be balanced amongst multiple FFE states, based on the needs of the priority populations being served.</p>	

Project narrative section 3 Project goals: What does this project expect to achieve?	Maximum points: 20
<ul style="list-style-type: none"> Establishes realistic and attainable project goals for the first 12-month budget period (August 27, 2024 to August 26, 2025). 	5 points
<ul style="list-style-type: none"> Project goals and target numbers are outlined in a table. 	10 points
<ul style="list-style-type: none"> Project goals take into consideration: <ul style="list-style-type: none"> The size of the proposed FFE service areas you will operate in. The size of the priority populations you will serve. The amount of funding you are requesting for the first 12-month budget period. 	5 points
<p>Multi-state applicants only: Provides separate project goals for each FFE state you are proposing to operate in.</p>	

Project narrative section 4 Capabilities: Community relationships, qualifications, and staffing plans	Maximum points: 35
Clearly describes your capabilities to carry out the proposed activities , reach your priority population, and achieve your project goals .	10 points
Describes current or prior experiences working with the priority populations. Provides at least one example of how you have successfully included community members and/or local organizations in a previous project.	5 points
Demonstrates a relationship to the priority populations and the communities you plan to serve. Provides at least two examples that show a trusted relationship with the priority populations and their communities.	5 points

Identifies organizations you will partner with to successfully carry out your project plan . Organizational partnerships are appropriate for the priority populations and targeted service areas and demonstrate the experience relevant to carry out the proposed activities.	3 points
Demonstrates the organizational and staffing capacity and qualifications needed to implement the proposed activities and achieve the expected project goals. Recruitment and hiring schedule , along with resumes and job descriptions , are provided for key personnel in the attachments.	5 points
Demonstrates your ability to ensure all Navigator staff complete the required federal and state (if applicable) training and certification requirements by October 1, 2024. The Navigator training and certification plan documents a plan for ensuring operational readiness.	2 points
Clearly outlines processes and tools the AOR and PD will use to oversee and monitor the proposed activities and completion of project goals.	5 points
Consortium applicants only: Describes the role each sub-recipient organization will have in the project and how their involvement will impact the proposed project plans.	

Project narrative section 5 Work plan and timeline	Maximum points: 30
Clearly outlines how you will implement all components of the project and achieve the project goals . Key activities, associated timeframes, and responsible staff are all documented.	10 points
Uses a chart, table, or graph to provide a realistic timeline, containing goals and objectives that are consistent with those outlined in the project plan for the first 12-month budget period of the project.	10 points
The outcomes identified in the work plan seem feasible and will provide actionable information to demonstrate success.	10 points

Project narrative section 6 Conflict of interest attestation	Maximum points: 10
Provides a written attestation that the organization, along with anyone who will perform work related to the organization's Navigator program activities, or who will perform Navigator services for the organization, does not have any of the prohibited relationships.	5 points
Provides a written attestation that the organization, along with anyone who will perform work related to the organization's Navigator program activities or who will perform Navigator services for the organization, will remain free of all applicable COIs during their term as a Navigator awardee.	5 points

Project narrative section 7 Ensuring privacy and security of consumer personally identifiable information (PII)	Maximum points: 25
Demonstrates the ability to comply with all applicable privacy and security standards by developing a PII plan that outlines the following:	
<ul style="list-style-type: none"> A process for ensuring compliance by all staff performing Navigator activities (as well as those who have access to sensitive information or PII related to your organization's Navigator activities) with FFE privacy and security standards, especially when using computers, laptops, tablets, smartphones, and other electronic devices. 	5 points
<ul style="list-style-type: none"> A schedule and process for assessing qualifications and monitoring the completion of all required training related to privacy and security standards and compliance by any staff performing Navigator activities (as well as those who have access to sensitive information or PII related to your organization's Navigator activities) to receive, secure, and handle PII or other sensitive information, including noting whether background checks will be conducted. 	10 points
<ul style="list-style-type: none"> A mitigation plan for addressing any PII breaches that may occur. 	5 points
<ul style="list-style-type: none"> A process for obtaining each consumer's authorization before gaining access to their PII. 	2 points
<ul style="list-style-type: none"> A process for providing ongoing monitoring throughout the duration of the project to ensure continued compliance with all privacy and security standards. 	3 points

Budget narrative	Maximum points: 15
<ul style="list-style-type: none"> Clearly supports the proposed activities for the first 12-month budget period of the project and includes a high-level summary of budget costs for Years 2 through 5. 	5 points
<ul style="list-style-type: none"> Costs appear reasonable relative to the project's purpose, goals, and strategy. 	5 points
<ul style="list-style-type: none"> Provides an explanation for how costs were calculated, along with a justification for the items in each budget category. 	5 points
<p>Multi-state applicants only: Provides a separate budget narrative for each FFE state you are proposing to operate in.</p>	

Risk review

Before making an award, we review the risk that you will not prudently manage federal funds. We need to make sure you've handled any past federal awards well and demonstrated sound business practices. We use SAM.gov [Responsibility/Qualification](#) to check this history for all awards. You can comment on your organization's information in SAM.gov. We'll consider your comments before making a decision about your level of risk.

If we find a significant risk, we may choose not to fund your application or to place specific conditions on the award.

For more details, see [45 C.F.R. 75.205](#).

Selection process

CMS selects recipients at our sole discretion.

When making funding decisions, we consider:

- Merit review results. These are key in making decisions but are not the only factor.
- Program office technical recommendations.
- Advice from other federal officials, advisory bodies, consultants, or others as documented in the NOFO.
- The larger portfolio of agency-funded projects, including the diversity of project types and geographic distribution.

- The past performance of the applicant. We may choose not to fund applicants with management or financial problems. See [risk review](#).
- Other awarded Navigator recipients in a given FFE state.
- The availability of remaining funds in an FFE state.

We may:

- Fund applications in whole or in part.
- Fund applications at a lower amount than requested.
- Decide not to allow a prime recipient to subaward if they may not be able to monitor and manage subrecipients properly.
- Choose to fund no applications under this NOFO.

Award notices

If you are successful, your authorized official will receive an email notification from GrantSolutions. You can then retrieve your Notice of Award (NoA). We will notify you if your application is disqualified or unsuccessful within 30 days of the award date.

The NoA is the only official award document. The NoA tells you about the amount of the award, important dates, and the terms and conditions you need to follow. Until you receive the NoA, you don't have permission to start work.

Find out more about [Notice of Award contents](#).



Step 5: Submit Your Application

In this step

Application submission and deadlines [57](#)

Application submission and deadlines

See [find the application package](#) to make sure you have everything you need.

Make sure you are current with SAM.gov and UEI requirements. See [get registered](#). You will have to maintain your registration throughout the life of any award.

Deadlines

Application

Due on July 8, 2024, at 11:59 pm ET.

[Grants.gov](#) creates a date and time record when it receives the application. If you submit the same application more than once, we will accept the last on-time submission.

The grants management officer may extend an application due date based on emergency situations such as documented natural disasters or a verifiable widespread disruption of electric or mail service.

Submission methods

Grants.gov

You must submit your application through Grants.gov unless we give you an exemption for a paper submission. See [get registered](#).

For instructions on how to submit in Grants.gov, see [Quick Start Guide for Applicants](#).

Make sure that your application passes the Grants.gov validation checks or we may not get it. Do not encrypt, zip, or password protect any files. See [Contacts and Support](#) if you need help.

Other submissions

Intergovernmental Review

This NOFO is not subject to [Executive Order 12372](#), Intergovernmental Review of Federal Programs. No action is needed other than checking “No” on the [SF-424 box 19c](#).

Assurance of compliance

If you receive an award, you must follow all applicable nondiscrimination laws. You agree to this when you register in [SAM.gov](https://sam.gov).

You and all subrecipients, including contractors, must also submit an [Assurance of Compliance, HHS-690](#). You will find instructions on how to submit it at the bottom of the form.

To learn more, see the [HHS Office for Civil Rights](#) website.

Mandatory Disclosure

You must submit any information related to violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award. See Mandatory Disclosures, [45 C.F.R. 75.113](#).

Send written disclosures to the Office of Inspector General at grantdisclosures@oig.hhs.gov. Include “Mandatory Grant Disclosures” in the subject line.

You must also email the disclosure to this NOFO’s administrative and budget contact. See [Contacts and Support](#).

Application checklist

Make sure that you have everything you need to apply:

Component	How to upload	Page limit
<input type="checkbox"/> Project abstract	Use the Project Abstract Summary Form.	1 page
<input type="checkbox"/> Project narrative	Use the Project Narrative Attachment form.	25 pages
<input type="checkbox"/> Budget narrative	Use the Budget Narrative Attachment form.	None
Attachments (7 total)	Insert each in a single Attachments form.	
<input type="checkbox"/> Work plan		None
<input type="checkbox"/> Indirect cost agreement		None
<input type="checkbox"/> Proof of nonprofit status		None
<input type="checkbox"/> Navigator training and certification plan		None
<input type="checkbox"/> Recruitment and hiring schedule		None
<input type="checkbox"/> Resumes and job descriptions for key personnel		None
<input type="checkbox"/> Business assessment of applicant organization		12 pages
Other required forms (4 total)	Upload using each required form.	
<input type="checkbox"/> SF-424 (Application for Federal Assistance)		None
<input type="checkbox"/> SF-424A: Budget Information for Non-Construction Programs		None
<input type="checkbox"/> Project/Performance Site Locations		None
<input type="checkbox"/> Disclosure of Lobbying Activities (SF-LLL)		None



Step 6:

Learn What Happens After Award

In this step

Post-award requirements and administration [61](#)

Post-award requirements and administration

Administrative and national policy requirements

There are important rules you need to know if you get an award. You must follow:

- All terms and conditions in the Notice of Award. See [CMS Standard Terms and Conditions](#).
- The rules listed at [45 CFR part 75](#), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards.
- The [HHS Grants Policy Statement \(GPS\)](#). This document has terms and conditions tied to your award. If there are any exceptions to the GPS, they'll be listed in your Notice of Award.
- All federal statutes and regulations relevant to federal financial assistance, including those highlighted in the [HHS Administrative and National Policy Requirements](#).
- Federal laws regarding accessibility if you receive a request for information in accessible formats. See [CMS Accessibility Requirements](#) on our website.

Reporting

If you are successful, you will have to submit reports. These include:

- Progress Reports.
- Federal Financial Reports (FFR).
- Federal Funding Accountability and Transparency Act ([FFATA](#)).
- SAM.gov Integrity and Performance Reporting (Responsibilities and Qualifications ([R/Q](#))).
- Payment Management System ([PMS](#)).
- Audit Reporting ([Federal Audit Clearing House](#)).
- [SAM.gov](#) Exclusions which include information related to suspensions and debarments.

Visit the CMS website for more information on [post-award reporting](#).

Progress data collection and reporting

Progress reports are collected on a weekly, monthly, quarterly, and final (at the end of the period of performance) basis. CMS will provide awardees with the format and additional guidance for submitting these reports, as well as the technical assistance necessary to complete the program reporting requirements.

A breakdown of the metrics contained within the weekly, monthly, and quarterly reports can be found on our website at [Navigator Cooperative Agreement Progress Data and Reporting](#).

Continued eligibility

Continued funding is contingent on satisfactory progress, compliance with the terms and conditions, and the availability of funds.

For CMS to issue continuation funding, you must demonstrate satisfactory progress. If we issue all the funding in the first year, then you must continue to show satisfactory progress to maintain access to your funds.

At any time, we could decrease funding or terminate your award if you fail to perform the requirements of the award. See [45 CFR 75.372 “Termination.”](#)

Satisfactory progress for selected award recipients includes, but is not limited to:

- The recipient’s ability to meet the self-imposed performance metrics ([project goals](#)) defined in the approved application, including:
 - Ensuring the targeted number of Navigator staff are federally trained and certified or re-certified and state certified (if applicable) by October 1 each year.
 - Achieving a completion rate of at least 50% for each of the remaining project goal categories by the six-month mark of each budget period, as defined in the approved application.
- Quality and timely submissions of weekly, monthly, quarterly, and final reports, as determined by CMS, including:
 - Ensuring key personnel have access to all required CMS systems by the prescribed due date of the first weekly report.
 - Ensuring all Navigator staff receive training on and adhere to the CMS Navigator Reporting Guidance (issued by CMS post-award).

- Compliance with the terms and conditions provided in the Notice of Award, including compliance with all applicable statutory and regulatory requirements.^[31]
- The recipient's ability to effectively communicate with and respond in a timely manner to requests from their CMS Project Officer and Grants Management Specialist throughout the period of performance.

Additional factors impacting continued eligibility

- CMS can take appropriate remedies and enforcement actions, which may impact total funding available for the next 12-month budget period.
- The recipient can voluntarily withdraw from the cooperative agreement program before the end of the five-year period of performance.
- If an FFE state converts to an SBE or SBE-FP state before the five-year period of performance ends, the Navigator cooperative agreement for all recipients in that state will end as of the date of conversion to an SBE or SBE-FP state, and any unexpended funds are returned to CMS.^[32] In the case of a multi-state award, the Navigator cooperative agreement will continue for any remaining FFE State(s) the recipient was previously approved to serve.

Non-competing continuation application (NCC)

Recipients will be required to submit NCCs annually for the duration of the five-year period of performance. CMS will provide instructions in the Notice of Award Terms and Conditions.

Recipients may use the NCC to adjust their budgets or make other administrative changes. Recipients will be allowed to revise their [project goals](#) in accordance with any reductions in funding.

Nondiscrimination and assurance

If you receive an award, you must follow all applicable nondiscrimination laws. You agree to this when you register in SAM.gov. You must also submit an Assurance of Compliance ([HHS-690](#)). To learn more, see the [Laws and Regulations Enforced by the HHS Office for Civil Rights](#).



Contacts and Support

In this step

Agency contacts	<u>65</u>
Grants.gov	<u>65</u>
SAM.gov	<u>65</u>
Reference websites	<u>65</u>

Agency contacts

Program

Navigatorgrants@cms.hhs.gov

Administration and budget

Grants@cms.hhs.gov

Grants.gov

Grants.gov provides 24/7 support. You can call 1-800-518-4726 or email support@grants.gov. Hold on to your ticket number.

SAM.gov

If you need help, you can call 866-606-8220 or live chat with the [Federal Service Desk](#).

Reference websites

- [U.S. Department of Health and Human Services \(HHS\)](#)
- [CMS Grants and Cooperative Agreements](#)
- [Grants.gov Accessibility Information](#)
- [Code of Federal Regulations \(C.F.R.\)](#)
- [United States Code \(U.S.C.\)](#)

Endnotes

Select the endnote number to jump to the related section in the document.

[1] Centers for Medicare and Medicaid Services Office of Minority Health. (April 2022). [CMS Framework for Health Equity 2022-2032 \[PDF\]](#).

[2] CMS has clarified in regulation that no health care provider shall be ineligible to operate as a Navigator in an FFE solely because it receives consideration from a health insurance issuer for health care services provided.

[3] [The Patient Protection and Affordable Care Act](#) (Pub. L. 111-148) was enacted on March 23, 2010. [The Health Care and Education Reconciliation Act of 2010](#) (Pub. L. 111-152), which amended and revised several provisions of the Patient Protection and Affordable Care Act, was enacted on March 30, 2010. In this document, we refer to the two statutes collectively as the “Affordable Care Act (ACA).”

[4] Additional information on the importance of SDOH and HRSNs in improving health and reducing health disparities can be found here: U.S. Department of Health and Human Services Office of Disease Prevention and Health Promotion (n.d.). [Healthy People 2030: Social Determinants of Health](#). Retrieved May 9, 2024.

[5] See [45 C.F.R. § 155.210\(d\)\(4\)](#)

[6] See [45 C.F.R. § 155.210\(d\)\(5\)](#)

[7] See [45 C.F.R. § 155.210\(d\)\(6\)](#) for definition of gifts.

[8] Applicant means “an individual seeking eligibility for themselves through an application submitted to an Exchange.” Potential enrollee means “an individual potentially qualified to enroll in a QHP.” See [45 C.F.R. § 155.20](#).

[9] We have previously defined “nominal value” as a cash value of \$15 or less, or an item worth \$15 or less, based on the retail purchase price of the item, regardless of the actual cost. See [79 FR 30239, 30283](#) (May 27, 2014).

[10] This nominal value limit applies to all gifts, including gift items, gift cards, cash cards, cash, and promotional items that market or promote the products or services of a third party. Some illustrative examples of permissible gifts and promotional items include pens, magnets, or key chains worth \$15 or less each, including if such items bear the name or logo of a local business, or community or social service program. Such items may, for example, be provided to consumers at outreach and education events or at other forums attended by members of the general public, as long as they are not being provided as an inducement to enrollment. See [81 FR 12204](#) (March 8, 2016).

[11] For additional guidance on this topic, see: Centers for Medicare and Medicaid Services (October 2023). [Assister Do’s and Don’ts \[PDF\]](#).

[12] See [45 C.F.R. § 155.210\(c\)\(1\)\(iii\)](#)

[13] For additional guidance and examples of best practices for Navigators when referring consumers to agents and brokers, see: Centers for Medicare and Medicaid Services. (August 2023). [Tips for Assisters on Working with Outside Organizations \[PDF\]](#).

[14] For additional guidance related to Navigator conflict of interest requirements, prohibitions, and required disclosures, see Centers for Medicare and Medicaid Services. (August 2023). [Assister Conflict of Interest Requirements \[PDF\]](#).

[15] CMS has clarified in regulation that no health care provider shall be ineligible to operate as a Navigator in an FFE solely because it receives consideration from a health insurance issuer for health care services provided.

[16] See [45 C.F.R. § 155.215\(a\)\(1\)\(iv\)](#).

[17] This only applies to lines of insurance business not covered by the restrictions on participation and prohibitions on conduct in [45 C.F.R. §155.210\(d\)](#).

[18] This includes any existing employment relationships between a spouse or domestic partner and any health insurance issuers or issuers of stop loss insurance or subsidiaries of health insurance issuers or issuers of stop loss insurance.

[19] This includes both existing and anticipated financial, business, and contractual relationships.

[20] See [45 C.F.R. §155.215\(a\)\(1\)\(ii\)](#).

[21] See the [HHS Grants Policy Statement](#) for a description of the roles and responsibilities of the AOR and PD.

[22] Actual funding available to awardees from CMS during Years 2 through 5 of this five-year period of performance will be determined based on the total amount of funding made available to the Navigator program for the 12-month budget period, as well as each awardee's performance during the prior budget period(s), as outlined in the [continued eligibility](#) section. As a result, individual award amounts during Years 2 through 5 may be higher or lower than the amount awarded for the first 12-month budget period. Award amounts are not appealable. In the absence of funding, CMS is under no obligation to make awards under this funding opportunity or can change the award amount prior to the issuance of a Notice of Award.

[23] CMS decisions regarding funding levels for each of the FFE states, as established in the Table 1: FFE state funding allocations, and decisions regarding the specific funding levels for each cooperative agreement award, are not appealable.

[24] "Eligible uninsured population" includes legal U.S. residents, under the age of 65. You can [view relevant data on HHS.gov](#).

[25] Centers for Medicare and Medicaid Services. (March 22, 2024). [2024 Marketplace Open Enrollment Period Public Use Files](#). Retrieved May 9, 2024.

[26] See [88 FR 25740](#) (April 27, 2023).

[27] FFE assister organizations include both [Certified Application Counselor Designated Organizations \(CDO\)](#) and [Enrollment Assistance Personnel \(EAP\)](#) that operate in states with an FFE.

[28] See the [HHS Grants Policy Statement](#) for a description of the roles and responsibilities of the AOR and PI/PD.

[29] See [45 C.F.R. § 155.215\(a\)\(1\)\(i\)](#).

[30] See [45 C.F.R. § 155.260](#).

[31] Failure to comply with the terms and conditions of this cooperative agreement, including compliance with all statutory and regulatory requirements, may result in placement on a formal corrective action plan. Awardees placed on a formal corrective action plan during the course of the five-year period of performance may not receive additional Navigator cooperative agreement funding for the subsequent 12-month budget periods, depending on their progress in meeting all of the terms in the corrective action plan.

[32] See [45 C.F.R. §155.106](#)