

Foundation Communities: Procedures for Handling Non-Public Information

Foundation Communities is a Centers for Medicare and Medicaid Services (CMS) Navigator-designated organization. In addition to enrolling more than 45,000 individuals in health insurance under the Affordable Care Act since October 2013, Foundation Communities has over a decade of experience assisting consumers with free tax preparation under the supervision of the Internal Revenue Service and has strict procedures in place for safeguarding Personally Identifiable Information (PII) and personal tax information.

The following is an overview of the internal procedures in place to safeguard PII:

- Require all consumers who meet one-on-one with a Navigator to sign a consent form before the Navigator reviews any PII provided by the consumer.
- Monitor desks and printers to ensure no documents containing PII or tax information are left unsecured or unattended.
- Return all original documents and copies containing PII to the consumer or shred all such documents and copies if the consumer cannot be reached by phone or mail.
- Obtain consent from the consumer before retaining any PII and only retain PII that is essential to completing the Marketplace application, analyzing Marketplace insurance options, or resolving an inconsistency or error associated with the Marketplace application or Marketplace insurance.
- Use and/or retain PII only for the purpose of assisting with a Marketplace application or enrollment in health insurance.
- Remind consumers that they must keep their PII locked and in a safe place they will remember.
- Do not upload PII to unauthorized websites.
- Only transmit PII in the direct service of consumers' health insurance needs.

Procedures to Protect Consumers

All consumers seeking application and/or enrollment assistance must sign a consent form that explains the responsibilities of the Navigators and Foundation Communities and the rights and responsibilities of the consumer, including their right to revoke the consent at any time.

Navigators will request and view a consumer's personal documents only to the extent necessary to assist the consumer with the next logical and reasonable step in the application and enrollment process. If it is necessary to retain copies of any information containing PII to complete that next step, Navigators must obtain the consumer's consent. Navigators will never retain any original documents of any consumer that contain PII (e.g., driver licenses, Social Security cards, income tax returns, etc.).

Navigators with Foundation Communities will not serve as an Authorized Representative in a Marketplace appeal. This policy, implemented in October 2015, protects consumers by ensuring that the Marketplace will communicate directly with the consumer on all matters related to their appeal and also protects our Navigators.

The computer equipment used for application and enrollment assistance is password protected and protected by antivirus software. The daily cache and web browser history is automatically cleared when the computer is shut down. Portable equipment is maintained in a secure location.

Procedures if PII is Improperly Handled

Foundation Communities will comply with the procedures set forth in 45 CFR §155.260.