Tips for PII

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Personally Identifiable Information (PII) is always a hot topic on ***In the Loop***. What information can assisters collect, how can you collect it, how can you store it, and how can you use it? Read on for answers to these common questions -- some of the answers may surprise you!

What is PII? PII is any information that can be used to distinguish or trace an individual's identity, either standing alone or when combined with other personal information that is linked or able to be linked to a particular individual. For example, a consumer's name, Social Security Number, citizenship or immigration status, Application ID, household income, qualified health plan eligibility status, or language preference is considered PII.

What can assisters do with PII? Navigators and Certified Application Counselors (CACs) may create, collect, disclose, access, maintain, store and use consumer PII to the extent necessary to perform their required assister duties.

What is consumer authorization? The Centers for Medicare & Medicaid Service (CMS) released guidance in November, 2014 (see this post) outlining how to collect and store a consumer's consent for assisters to collect PII, including **Model Authorization Forms** (both for Navigators and for CACs). The consumer authorization must include an acknowledgement that the consumer has been informed of the functions and responsibilities of the your role as the assister, consent that allows you to access and use the consumer's PII to carry out the assister role, and an acknowledgement that the consumer can revoke or limit the authorization at any time.

The guidance also includes more specific recommendations for what information the record of the authorization must include and how to maintain that record securely, whether electronically or in hard copy. We have received some questions about **storing PII and the record of authorization**. CMS recommends keeping hard copies "in a locked file cabinet that may only be accessed by authorized individuals" or keeping electronic records "in a password-protected computer and/or a file that is kept securely at all times." Read the full guidance for more!

Want to know how to handle PII in some common scenarios? You can also check out the guidance for examples of specific scenarios, including assisting a homebound consumer over the telephone, using outreach event sign-up sheets for follow-up, or receiving PII either from a consumer making initial contact or a third party.

Want to follow up with a consumer? CMS has reassured assisters that if a consumer gave permission for a follow up from the assister during the initial application phase, then they are allowed to re-contact the consumer about marketplace eligibility redetermination and the re-enrollment process.

Want to know more? The Center for Consumer Information and Insurance Oversight (CCIIO) answered some Looper questions on the post, "Closing the Loop" – it is worth a read!