

CONFLICTS OF INTEREST FOR NAVIGATORS, IPAS

Navigators, IPAs cannot have conflicts of interest, financial or otherwise, and will need to comply with the Exchange's privacy and security standards. Specifically, Navigators, IPAs cannot receive any consideration, financial or otherwise, from carriers. All Navigator, IPA entities must submit to the Exchange a written attestation that the Navigator, IPA and staff, complies with the Exchange's conflict of interest standards during the entire period grant funds are received by the entity.

Conflict of interest includes, but is not limited to, the following:

• Financial considerations: Entities performing the duties of Navigator, IPA shall not receive compensation from funds derived from the enrollment of individuals, families or groups in health insurance plans or Issuers of stop loss insurance. This includes but is not limited to:

• Employees who work for subsidiaries of health insurance Issuers or Issuer of stop loss insurance even if that subsidiary does not offer health insurance for purchase.

• Employees of hospitals that are owned in whole or in part by health insurance Issuers.

o Lobbyists or employees of entities that lobby for the interests of health insurance Issuers.

• Nonfinancial considerations: Entities performing the duties of Navigator, IPA shall not receive gifts, rebates, vacations, prizes or any other non-financial consideration from a health insurance Issuer or an employer for the enrollment of an individual, family or group in the Exchange.

Navigators, IPAs are required to disclose the following information to the Exchange and to consumers seeking assistance:
The impact of an immediate family member's employment or activities with other potentially conflicted entities, including the employment of a family member by a health insurance issuer including agents, brokers, and producers.

• Existing financial, non-financial, or contractual relationships with health insurance issuers or issuers of stop loss insurance including pensions from issuers, investments in issuers and receiving funds from issuers for other activities (health outreach sponsored by issuers, Public Awareness Campaigns sponsored by issuers, etc.)

• Any lines of insurance business not covered by the restrictions on participation and prohibitions on conduct which the Navigator, IPA intends to sell while carrying out the consumer assistance functions of the Exchange.

To ensure that the public is protected from possible conflicts of interest in the Exchange, the Exchange may monitor Navigators, IPAs based enrollment patterns to make sure that the entities are providing unbiased information to the consumer. If a Navigator, IPA is found to be steering consumers into a certain plan for the purpose of financial or material gain, the Exchange and/or the Nevada Division of Insurance will inform individuals of the legal and financial recourses for consumers that have been adversely affected by a Navigator, IPA with a conflict of interest. The Nevada Division of Insurance and the Exchange will investigate and seek all applicable civil and criminal penalties for Navigators, IPAs that act in a manner inconsistent with the conflict of interest standards set forth by the Exchange. The civil and criminal penalties that apply to Exchange Enrollment Certification may be found in Nevada Assembly Bill 425.

Due to the above conflict of interest standards, any Producers that are currently licensed and wish to obtain a Navigator, IPA designation must sever all appointments with carriers.