



Health Reform: **Beyond the Basics**

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Part VII:

HealthCare.gov Redetermination and Renewal Process for 2021

October 8, 2020

Presented by the Center on Budget and Policy Priorities
Tara Straw, Senior Policy Analyst

Part VIII: Special Topics on Assisting Immigrant Communities

- Thursday, October 15 | 2 pm ET (11 am PT)

Part IX: Assisting People with Disabilities

- Thursday, October 22 | 2 pm ET (11 am PT)

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NOVEMBER 2020

S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

DECEMBER 2020

S	M	T	W	T	F	S
		1	2	3	4	5
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13	14	15				

Jan 1: 2021 coverage year begins

- HealthCare.gov's open enrollment period will run from November 1 through December 15, 2020: **45 days in total**
- State-based marketplaces can extend their open enrollment period

Most State-Based Marketplaces Extend Open Enrollment

5

State-Based Marketplaces Open Enrollment Periods for 2021 Coverage

- **California** November 1, 2020 – January 31, 2021 *permanent
- **Colorado** November 1, 2020 – January 15, 2021 *permanent
- **Connecticut** November 1, 2020 – December 15, 2020
- **District of Columbia** November 1, 2020 – January 31, 2021 *permanent
- **Idaho** November 1, 2020 – December 15, 2020
- **Maryland** November 1, 2020 – December 15, 2020
- **Massachusetts** November 1, 2020 – January 23, 2021
- **Minnesota** November 1, 2020 – December 22, 2020
- **Nevada** November 1, 2020 – January 15, 2021
- **New Jersey** November 1, 2020 – January 31, 2021
- **New York** November 1, 2020 – January 31, 2021
- **Pennsylvania** November 1, 2020 – January 15, 2021
- **Rhode Island** November 1, 2020 – December 15, 2020
- **Vermont** November 1, 2020 – December 15, 2020
- **Washington** November 1, 2020 – January 15, 2021

Encourage Active Re-enrollment

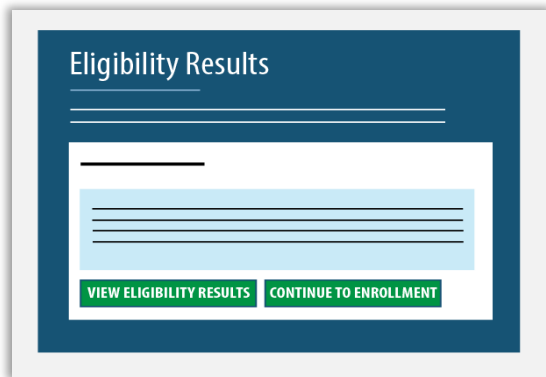
Why should consumers choose active re-enrollment?

- Get the most accurate eligibility determination, advance premium tax credit (APTC), and cost-sharing reduction (CSR)
 - Update income, household size, and employer insurance offer
 - This is especially true this year since income projections may be significantly different than the 2019 income in the data hub
 - Receive the correct amount of financial assistance to avoid getting too little help or repaying at reconciliation
- Explore new health plan options
 - New insurers or plans
 - Changes to premiums, provider networks, and out-of-pocket costs
 - In 2019, consumers who actively re-enrolled paid 38% less per month
- Switching plans outside open enrollment is restricted
 - Requires a special enrollment period

Redetermination of APTC

(in HealthCare.gov)

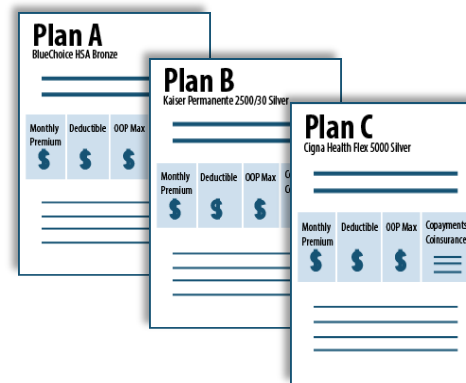
Redetermining Eligibility & Amount of Financial Help



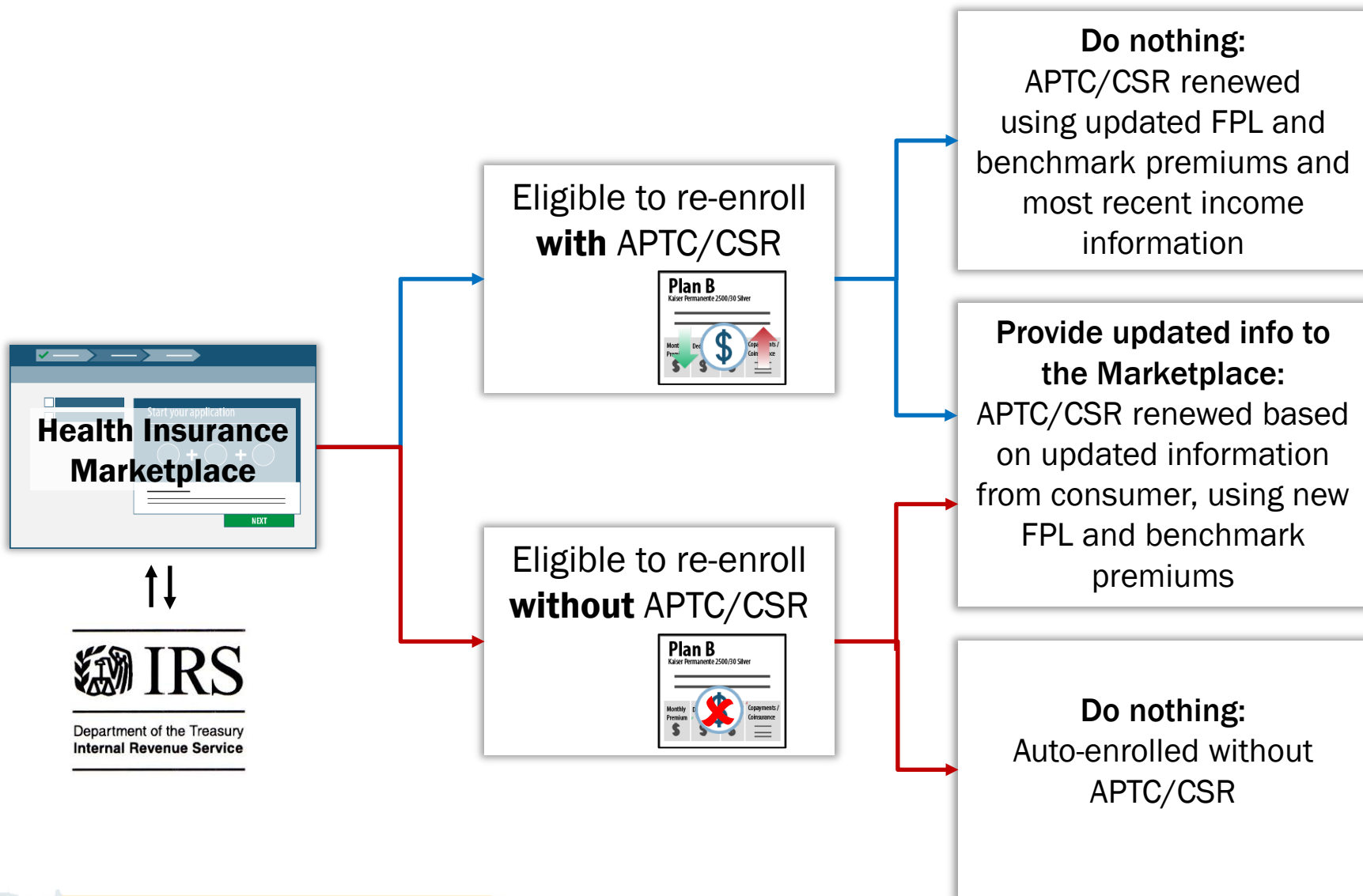
- Process HealthCare.gov uses to redetermine eligibility for 2021 APTC and CSR

and

Automatic Enrollment into a Plan



- Process HealthCare.gov uses to assign a 2021 plan



Marketplace Open Enrollment Notice (MOEN)

- Description of redetermination and re-enrollment process based on the enrollee's situation
 - Emphasizes importance of updating application and comparing plan options
 - If eligible, explanation of how amount of APTC/CSR will be determined for 2021 if enrollee does not contact the Marketplace
 - For certain groups, will include warning that if no action is taken, they'll be re-enrolled WITHOUT APTC or CSR, but doesn't say precisely why enrollee is ineligible.
- Important deadlines for open enrollment
- Not a determination

2020 Application ID: [Number]

**Action required November 1 – December 15, 2020:
Confirm your coverage & financial help for 2021**

Review your Health Insurance Marketplace coverage and costs for next year. The following people are currently enrolled in coverage with financial help through the Marketplace:

- [Number]

The Marketplace Open Enrollment Period is November 1 – December 15, 2020. During this time, you can shop for new Marketplace coverage or choose to stay in the same type of plan, if it's still right for you. You're currently getting financial help with the cost of health coverage each month. It's important to update your household income and other information to make sure you're getting the right amount of help.

Standard Group:

- Authorized HealthCare.gov to pull tax data related to income and household size
- Available income information shows income within APTC range
- Don't fall into one of the special groups that cannot be redetermined

Income-Based Outreach Group:

- Authorized HealthCare.gov to pull tax data related to income and household size
- One of the following applies:
 - IRS didn't provide updated tax return information
 - Most recent eligibility determination or 2019 tax data show income above 350% FPL
 - 2019 tax data show income more than 50% higher or lower than most recent eligibility determination
 - 2019 tax data show income under 100% FPL

! *Likely had changes and may not receive correct subsidy in 2021 → Marketplace Open Enrollment Notice will emphasize this and encourage individual to return to the Marketplace*



IF NO ACTION TAKEN: Auto-renewed with redetermined APTC/CSR

Opt-Out Group:

- **Did not authorize** HealthCare.gov to pull tax data related to income and household size
- ! *Marketplace cannot look up most recent income information to redetermine eligibility*

Repeat Passive Group:

- **Auto-renewed for past two years**, did not return to the Marketplace to update eligibility in those years, and no IRS information on income for those years
- ! *Available income information cannot be used to redetermine eligibility*

Over-Income (“Special Notice”) Group:

- 2019 tax information shows income **above 500% FPL**
- ! *Likely to be over income for APTC eligibility*

Failure to File & Reconcile Group (FTR):

- Received APTC in 2019 but **didn’t reconcile APTC** received for that year
- ! *Not eligible for APTC until applicant files and attests in the application to reconciling 2019 APTC*
- ! *Will get a special paper-only FTR warning notice*

IF NO ACTION TAKEN: Automatically re-enrolled **without** APTC/CSR

Failure to Reconcile Open Enrollment Warning

- Sent to 2019 enrollees (who are also enrolled in 2020 coverage) who did not file a tax return and reconcile their 2019 APTC
- Person-specific, unlike MOEN
- Must attest to filing in order to receive financial assistance in 2021
- Paper notice only

2018 Application ID: [Application ID]

ACT NOW: YOU'RE AT RISK OF LOSING FINANCIAL ASSISTANCE STARTING JANUARY 1, 2019.

IRS records show that you haven't filed a 2017 tax return with a Form 8962 to reconcile advance payments of the premium tax credit. If you want to continue to receive financial assistance to help pay for Marketplace health coverage in 2019, you must file and reconcile as soon as possible.

Dear Taxpayer:

Why we're sending you this letter

In 2017, advance payments of the premium tax credit were made to your (or someone in your tax household's) health insurance company to reduce your health insurance premium costs. This financial assistance is also being paid for your 2018 coverage.

Member of Enrollment Group has Medicare Coverage:

- If an insurer learns that someone is entitled to Medicare Part A or enrolled in Medicare Part B, insurers will terminate Marketplace coverage for all enrollees on December 31, 2020.
- Any individual who shares a policy with a person enrolled in Medicare will not have coverage renewed for 2021 (even if they are still eligible for enrollment)
- ! *Individuals who are not enrolled in Medicare should return to the Marketplace and re-enroll in coverage*
- ! *If open enrollment has ended, a **special enrollment period is available** for eligible individuals to re-enroll in coverage*

Should receive notices from:

- **Insurer:** Informing about the termination of coverage and the non-renewal for 2021
- **Marketplace:** Informing individuals that they might be eligible to re-enroll in coverage during open enrollment or during a special enrollment period



IF NO ACTION TAKEN: Coverage will not be renewed for 2021

- Information used to redetermine 2021 APTC and CSR:
 - Updated federal poverty guidelines
 - 2021 benchmark plan premium information
 - Most recent income information available, adjusted to 2021 (maintaining FPL level)
 - 2020 projected income (Note: Consider COVID impact!)
 - 2019 tax data (Note: Consider COVID impact!)
 - Projected 2019 income (if 2019 tax data indicate income below APTC threshold)

- Katie updated her application during last year's open enrollment to update her income information and re-enroll in 2020 coverage
 - If Katie doesn't update her income for 2021, the Marketplace will use 2020 projected income as most recent income to be adjusted

	2020 Projected Income	2021 Adjusted Income
Household Income	\$18,735	\$19,140
Corresponding FPL	150%	150%

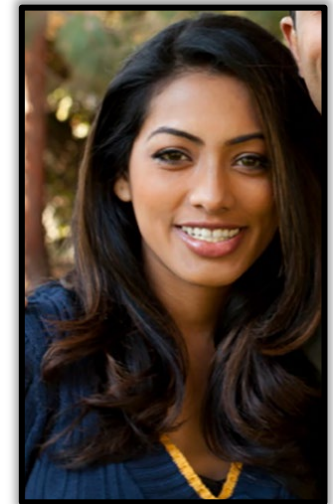
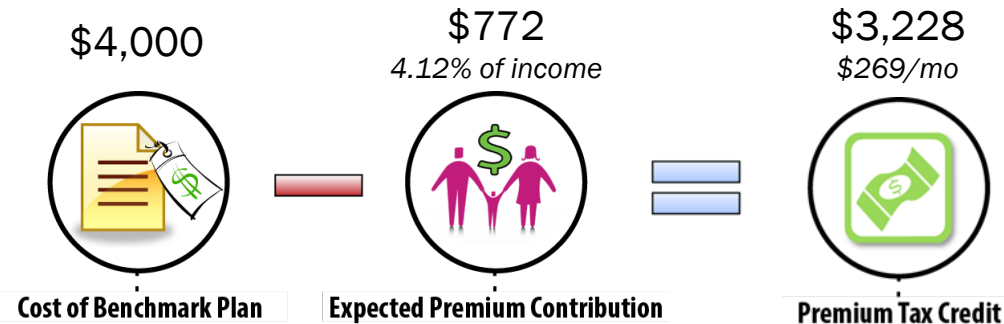
- Sasha was enrolled in 2019 and auto-renewed for 2020
 - Marketplace will use 2019 tax data as most recent income to be adjusted

	2019 Tax Data	2021 Adjusted Income
Household Income	\$33,100	\$33,814
Corresponding FPL	265%	265%

Example: Redetermining APTC

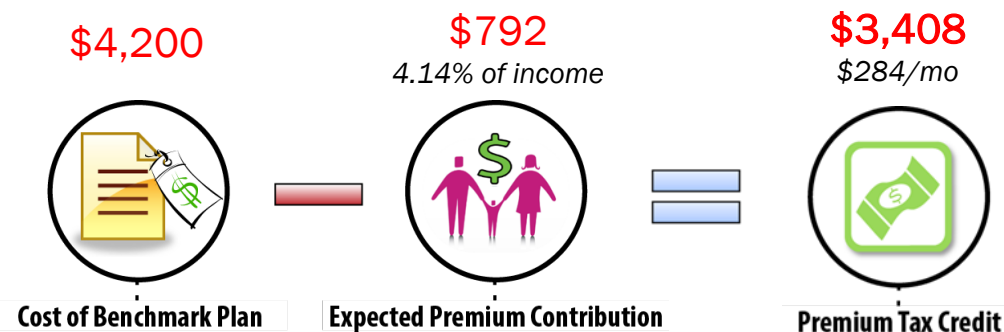
Katie's 2020 Eligibility:

- Household income: \$18,735 (150% FPL in 2019)



Redetermination of APTC for 2021:

- Household income is adjusted: **\$19,140** (150% FPL in 2021)



Auto-Enrollment for 2021 Plans

(in HealthCare.gov)

Notice from Insurer

- Availability of current plan
 - Key changes to benefits and cost sharing of current plan
 - If current plan not available, two scenarios:
 - **If another plan is available through the same insurer:** Will be auto-enrolled in new plan and notice will provide information on new plan (will include language on discontinuation of current plan and details on how to pick a different plan)
 - **If no plans are available through same insurer:** Will lay out discontinuation of current plan and how to pick a new plan (will note that Marketplace may automatically enroll person in different plan through a different insurer)
- Premiums for current or new plan
 - Estimates premium amount taking into account monthly APTC amount a person currently receives (if any)
 - **Important!** APTC in notice could reflect:
 - Current APTC an enrollee receives, or
 - Redetermined APTC → Actual APTC for 2021 may be higher or lower depending on income and the change in cost of benchmark plans in a person's service area
- Information about other health coverage options
 - Includes how to pick a different plan in the Marketplace

- If no action by December 15, 2020 (the end of open enrollment), a person will be auto-enrolled in a plan for 2021
 - Subsidies will be adjusted (or discontinued!) in accordance with the redetermination process for APTC and CSR
- Hierarchy to determine plan for auto-enrollment
 - **First option:** Same plan as previous coverage year
 - **Second option:** If same plan is not available, new plan with same insurer that is as similar as possible to current plan
 - **Third option:** If no plans available from same insurer, new plan with different insurer that is as similar as possible to current plan



*A person can go back to the Marketplace **at any time during open enrollment and pick a different plan***

If current plan is still available:

- Will be auto-enrolled in **same plan as previous year**

Note:

- Premiums, benefits, and cost sharing may change
- Notice will outline 2021 premium costs and changes to plan
 - Premium will take into account any monthly APTC amount a person currently receives or redetermined APTC
- Can return to Marketplace until December 15th to pick a different plan → If the enrollee doesn't return by December 15th, they will be auto-enrolled in same plan
- Have until December 31st to cancel coverage without incurring any 2021 premiums (but will not be able to pick a new plan after December 15th)

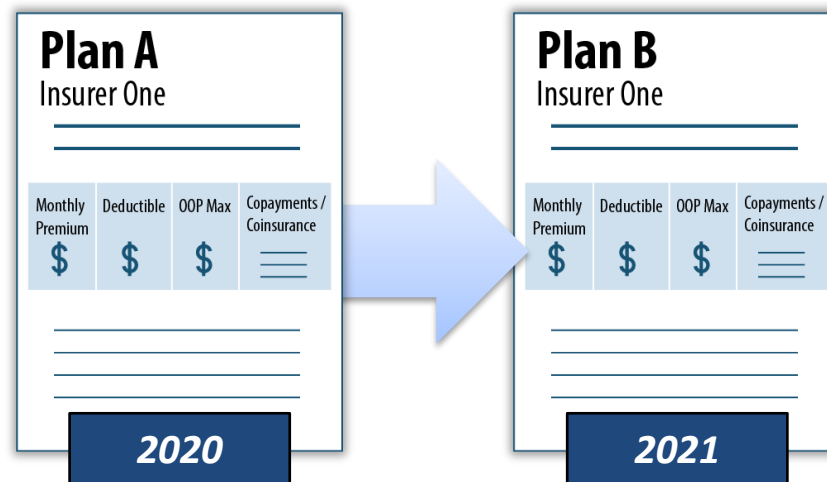


If current plan is not available:

- Will be auto-enrolled in **new plan with same insurer**

Note:

- Notice will outline premiums, benefits and cost sharing in new plan
 - Premium will take into account any monthly APTC amount a person currently receives or redetermined APTC
- Can return to Marketplace until December 15th to pick a different plan → If the enrollee doesn't return by December 15th, they will be auto-enrolled in new plan
- Have until December 31st to cancel coverage without incurring any 2021 premiums
- *Eligible for a special enrollment period (SEP) due to discontinuation of previous year's plan*

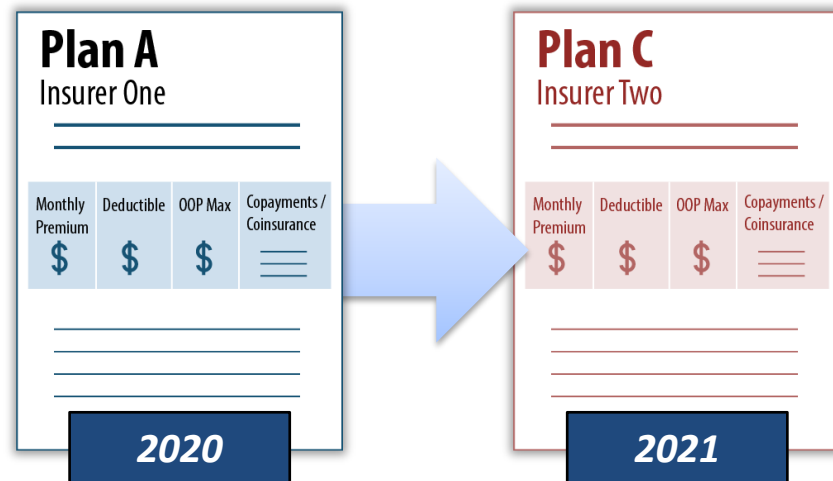


If current plan is not available and insurer no longer selling plans in the Marketplace:

- Will be matched with a **new plan with different insurer**

Note:

- Will receive a discontinuation notice from current insurer
- Marketplace will send a notice that the Marketplace matched person with different plan with different insurer (under no obligation to enroll in plan)
- Should receive notice from new insurer on new plan and details on paying first month's premium
- Must pay first month's premium to effectuate coverage (if no premium paid for January 1, enrollment will not go into effect) → Have until January 1st to pay first month's premium
- Eligible for a special enrollment period due to discontinuation of previous year's plan



Note: *If no plan available from current insurer, will be matched with new plan with a new insurer in the Marketplace*

- *Will receive discontinuation notice from current insurer*
- *New insurer should send notice with details on new plan*
- *Marketplace will send cross-issuer notice*

Cross-Issuer Notice

- If matched with a new plan with a new insurer, the enrollee will receive an additional Marketplace notice
 - Includes name of new plan and insurer
 - Includes information on next steps, including how to compare other options and how to activate a special enrollment period

Dear [Name]

Important information about your 2020 Marketplace health coverage

You recently got a letter from your Marketplace health insurance company letting you know that your current plan won't be available through the Marketplace for 2020.

We matched you with an alternate plan offered by a different insurance company, so you don't have a gap in your coverage. You'll get information about this new plan, including welcome information and a bill for the first month of coverage, from the company offering it. **You don't have to stay in this new plan. You can still choose any available plan.**

Each person listed here was matched with a plan:

- Susan Griffith: enrolled with [current health insurance company] for 2019, now matched with [2020 health plan] offered by [2020 health insurance company] for 2020.

Visit the Marketplace by December 15, 2019

- If 2020 plan is discontinued, the enrollee is eligible for a special enrollment period (SEP) based on loss of other qualifying coverage
- Can switch plans up to 60 days BEFORE or 60 days AFTER the discontinuation date of 2020 plan (December 31, 2020)
 - This means people who are auto-enrolled in a new plan (with a new insurer or with the same insurer) can still change plans after January 1, 2021

Katie's plan is no longer available in the Marketplace:

- She receives
 - A notice from her insurer about discontinuation of her plan
 - A notice that the Marketplace matched her with a new plan with a different insurer



Katie checks her Marketplace account on December 20:

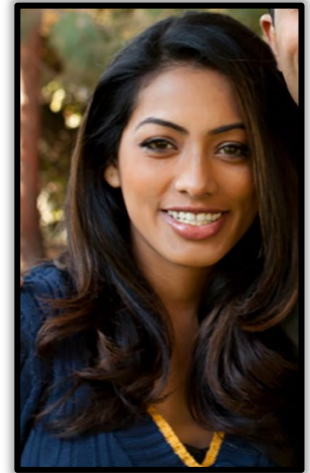
- She has been auto-redetermined for APTC for 2021 (for \$301/month)
 - She expects to make more money in 2021 and updates her application (her APTC eligibility is updated to \$184/month)
- She has been matched with a new plan with a new insurer
 - BUT she must pay the first month's premium to effectuate coverage
 - When she updates her application, the matched plan is shown at the top of her options during plan selection → She likes the plan and pays the first month's premium: **Coverage begins January 1**

But what if Katie wants to change plans?

- Because her plan was discontinued, she is eligible for an SEP
 - When she updates her application, she will note that she is losing coverage December 31, 2020

Changing plans after open enrollment ends *but before the new coverage year:*

- When she updates her application to change her 2021 income projection, she can pick a different plan than the one she is matched with
 - Coverage begins January 1, 2021



But what if Katie wants to change plans?

- Because her plan was discontinued, she is eligible for an SEP
 - When she updates her application, she will note that she is losing coverage December 31, 2020



Changing plans after January 1st:

- *If auto-enrolled in a plan:*
 - She will have 60 days after the end of her 2020 plan to use the SEP
 - Coverage will be effective the first day of the month following plan selection
- *If renewal plan is never effectuated:*
 - Katie doesn't pay the first month's premium for the plan she's been matched with and she is not auto-enrolled in any plan
 - She can still use the SEP to enroll in coverage after January 1, but she may have a gap in coverage

Eligibility Determination Notice (EDN)

- Everyone gets an EDN
 - Eligibility determination for the upcoming plan year
 - Confirmation of plan name, plan ID, and financial assistance
- No EDN if not successfully re-enrolled
- **Read closely!** Multiple versions of the EDN:
 - Eligible for a QHP and APTC (and cost-sharing reductions)
 - Eligible for a QHP without APTC
 - Mixed eligibility (Medicaid/APTC)
 - Assessed eligible for Medicaid

Eligibility notice: Take action to enroll & use your financial help

Household member(s)	Results	Next steps
[Name]	<ul style="list-style-type: none">• Eligible to buy a 2020 Marketplace plan.• Eligible for advance payments of the premium tax credit to help pay for a Marketplace plan. You can use up to this much of the tax credit:<ul style="list-style-type: none">• \$[amount] each month, which is \$[amount] for the year, for your tax household.• This is based on the yearly household income of \$[amount]—the amount that you put on your application, or that came from other recent information sources.• Can choose a Silver plan with lower copayments, coinsurance, and deductibles (cost-sharing reductions).	<ul style="list-style-type: none">• Choose a plan and pay your first month's premium.• You must choose a Silver plan to get cost-sharing reductions, which provide extra savings on out-of-pocket costs.

Enrollment Confirmation Message

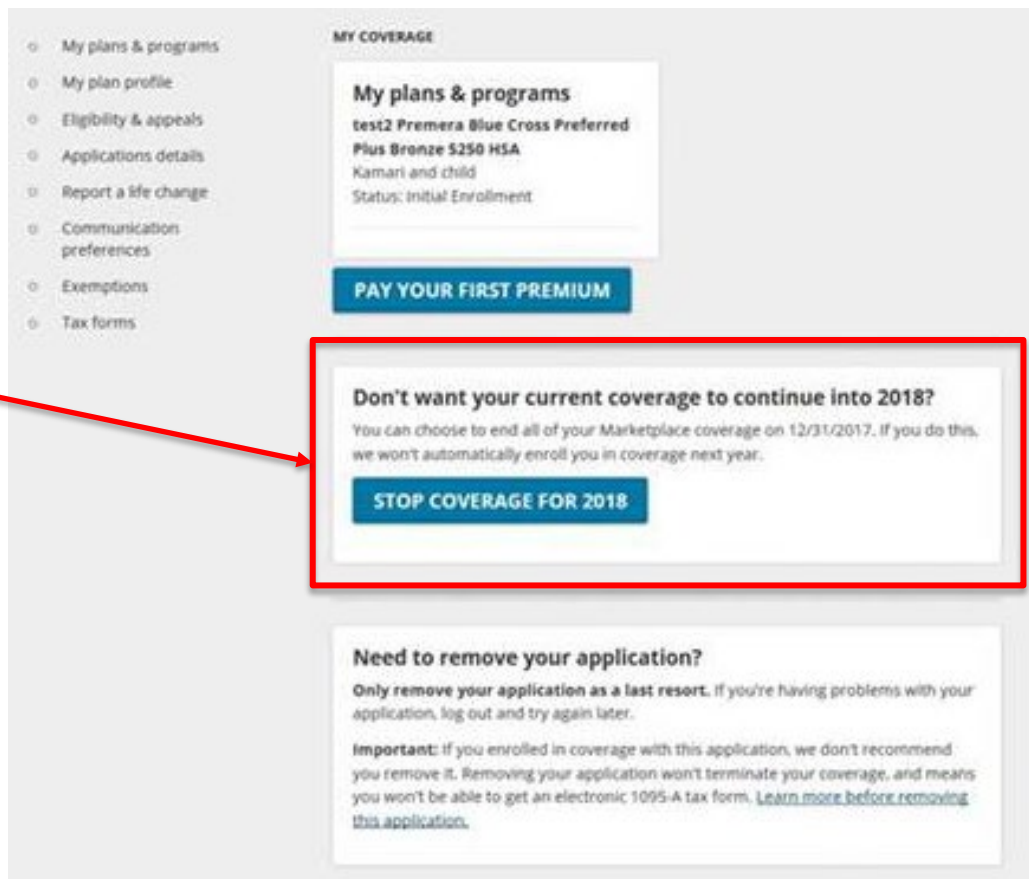
- Sent if enrollee has not returned to the Marketplace for an active plan selection by December 15
 - Eligibility determination for the upcoming plan year
 - Confirmation of plan name, plan ID, and financial assistance
- **Read closely!** Multiple versions of the Enrollment Confirmation:
 - Standard auto-renewal
 - Enrolled with another insurer
 - Enrolled without financial assistance
 - Enrolled but need to submit documents

You're automatically enrolled in the Marketplace plan(s) below for coverage beginning January 1, 2020.

Enrolled individuals	Now enrolled in this plan	Will I get financial help for this plan in 2020?
Susan Griffith	[Plan name] Plan ID: [Number] Effective January 1, 2020	Yes. This full amount of your premium tax credit will be applied to your monthly insurance premium: \$528.00. This plan has lower copayments, coinsurance, and deductibles (cost-sharing reductions).



- Enrollees have until December 31st to cancel 2021 coverage without incurring any premium cost for 2021
- They can **stop coverage for 2021** so the plan will end on December 31, 2020 and won't be auto-renewed
- If coverage isn't stopped, the enrollee may be responsible for a month's premium



MY COVERAGE

My plans & programs
test2 Premiera Blue Cross Preferred
Plus Bronze \$250 HSA
Kamari and child
Status: Initial Enrollment

PAY YOUR FIRST PREMIUM

Don't want your current coverage to continue into 2018?
You can choose to end all of your Marketplace coverage on 12/31/2017. If you do this, we won't automatically enroll you in coverage next year.

STOP COVERAGE FOR 2018

Need to remove your application?
Only remove your application as a last resort. If you're having problems with your application, log out and try again later.

Important: If you enrolled in coverage with this application, we don't recommend you remove it. Removing your application won't terminate your coverage, and means you won't be able to get an electronic 1095-A tax form. [Learn more before removing this application.](#)

- Emphasize the importance of updating information and shopping for plans!
 - Help people more accurately project 2021 income, especially if their circumstances fluctuate. Compare 2019 and 2020 projections with actual income to help facilitate more accurate income projections, but COVID will have a big impact.
 - In 2020, 79% of people shopping in the Marketplace had access to a plan for under \$75 a month after accounting for APTC.
- Remind people they only have until December 15th (the end of open enrollment) to change plans
 - *Look out for:* People eligible for cost-sharing reductions who are auto-enrolled into a non-silver plan; *and*
 - People who may be eligible for a special enrollment period (including those whose 2020 plans were discontinued)
- Educate consumers who received APTC in past years about the need to file a tax return and reconcile their APTC (refer to tax professionals, if possible)
- Remind people to cancel their plan if they don't wish to re-enroll

- Guidance on Annual Eligibility Redetermination and Re-Enrollment
 - [Guidance for Coverage Year 2019 and Beyond \(PDF\)](#)
 - [Guidance for Coverage Year 2018 \(PDF\)](#)
 - [Guidance for Coverage Year 2017 \(PDF\)](#)
- Notices:
 - [Insurer template notices](#): Coverage renewals or discontinuation
 - [Marketplace notices](#): See *Open Enrollment Notices*

Part VIII: Special Topics on Assisting Immigrant Communities

- Thursday, October 15 | 2 pm ET (11 am PT)

Part IX: Assisting People with Disabilities

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- Tara Straw, tstraw@cbpp.org
→ Twitter @TaraStraw
- General inquiries: beyondthebasics@cbpp.org

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