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2016 Reenrollment Bulletin Highlights

August 31, 2015

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Bulletin 16: Guidance for Issuers on 2016 Reenrollment in the Federally-facilitated Marketplace (FFM) is available here: https://www.regtap.info/uploads/library/ENR_2016AutoReenrollmentBulletin16_v2_5CR_082515.pdf.

Highlights:

1. **Establishing eligibility for 2016 advance payments of the premium tax credit (APTC) and income-based cost-sharing reductions (CSRs) using the most recent family income data available and updated 2016 Qualified Health Plan (QHP) prices**
   - In the 2015 plan year, 2014 APTC and CSRs were generally carried forward
   - Eligibility criteria is discussed in the April 22nd Guidance, available at: http://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/annual-redeterminations-for-coverage-42215.pdf

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2. **Discontinuing APTC and income-based CSRs for enrollees who do not comply with the requirement to file a tax return and reconcile APTC for tax year 2014**
   - Failure to Reconcile is a new group in 2016
   - Last year, FFMs sent outreach files for people in the Opt-Out and Special Notice Groups
   - This year, FFMs will send issuers outreach files identifying consumers who fall into the Opt-Out, Special Notice, or Failure to Reconcile groups. It will come in one combined file and will not identify which consumer falls into which group
   - Similar to last year, outreach files are for optional outreach so issuers can help their enrollees maintain financial assistance in 2016
     - The files will be sent via the DATAM file function code.
     - The file layout is available on CMSzONE here: https://zone.cms.gov/document/inconsistency-data-file-layout.

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3. **Sending the first group of passive reenrollment transactions to issuers before the start of the 2016 Open Enrollment Period (OEP)**
   - FFMs expect to send passive reenrollments in two waves—the first wave is scheduled to begin on October 15, 2015, and the second wave is scheduled to begin on December 16, 2015
   - Passive enrollments will contain updated APTC/CSR eligibility based on the April 22nd Guidance
   - The June 12th Guidance (available at: http://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Guidance-on-Distribution-of-Information-Regarding-APTC-and-CSR-061215.pdf) provides instructions on the APTC/CSR information that should be included in renewal notices if the passive enrollment is not received before the renewal notice deadline
     - If the 2016 renewal notice includes estimated APTC/CSR, final 2016 APTC/CSR should be stated in the January bill and/or a supplementary notice
   - The January bill should use the same estimated APTC/CSR from the renewal notice if the issuer has not received the passive or active reenrollment

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4. **Maintaining 2015 enrollees' effectuation status in 2016 passive reenrollment transactions**
   - FFMs are carrying forward the policy status of the previous enrollment (effectuated or initial)
   - Issuers do not need to send FFMs an effectuation transaction for the same FFM-assigned Subscriber ID passively or actively reenrolling in coverage with the same issuer
   - Similarly, issuers need not send effectuations when a current-year-effectuated enrollee selects the same issuer in an enrollment update reported through a Change in Circumstance (CiC)
   - The Centers for Medicare & Medicaid Services (CMS) requires that issuers collect a binder payment for new enrollments and active reenrollments into new products

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5. **Re-running Batch Auto-Reenrollment (BAR) for consumers who report life changes on their 2015 enrollment but do not update their 2016 application and enrollment**
   - Life changes reported after the enrollee was passively reenrolled will be reflected in the second wave of passive reenrollments that begins on December 16, 2015