Death Periodic Data Matching (PDM)

Identifying and Removing Deceased Enrollees Who Are Also Enrolled in Exchange Coverage

July 22, 2019

https://www.regtap.info/FFENR.php

Disclaimer

The information provided in this presentation is intended only as a general informal summary of technical legal standards. It is not intended to take the place of the statutes, regulations, and formal policy guidance that it is based upon. This presentation summarizes policy and operations current as of the date it was presented. Links to certain source documents have been provided for your reference. We encourage audience members to refer to the applicable statutes, regulations, and other interpretive materials for complete and current information about the requirements that apply to them.

Death Periodic Data Matching (PDM)

This presentation will cover:

- Why Death PDM is important for enrollees
- How you can help the estate of a deceased enrollee or enrollees erroneously identified as deceased respond to the Death PDM estate notice
- Where you can find additional resources about Death PDM

Death PDM: Background

- Exchanges must:
  - Periodically examine available data sources to determine whether enrollees who are enrolled in Exchange coverage have become deceased (45 CFR 155.330(d)(1)(i))
  - Notify these enrollees that our records show they are deceased, and if the consumer doesn't respond to the notice within 30 days, end Exchange coverage and financial assistance retroactively to their date of death (45 CFR 155.330(e)(2)(i)(D), 155.430(b)(2)(i), and 155.430(d)(7))

- Death PDM identifies enrollees who are both:
  - Enrolled in Federally-facilitated Exchange (Exchange) coverage, and
  - Recorded as deceased in the Social Security Administration's death master file

IMPORTANT: Currently, the Exchange is only conducting Death PDM for enrollees in single-member applications who are identified as deceased.

Why Death PDM & Noticing is Important for Consumers

- Deceased enrollees are not eligible for qualified health plan (QHP) coverage or advance payments of the premium tax credit (APTC) or cost-sharing reductions (CSR)

- Timely removal of deceased enrollees means that consumers aren't unnecessarily charged for premiums or receive excess APTC

Death PDM:

Notifying the Estate of Deceased Enrollees

- The Exchange mails paper Death PDM estate notices* addressed to the estate of the deceased enrollee
- If an enrollee has been correctly identified as deceased, no further action is required

Death PDM Estate Notices will Include:
• Name of the deceased enrollee
• Clarification that no action is required from the estate if the enrollee identified is indeed deceased
• Instructions on how to disagree with the determination if the identified enrollee has been erroneously identified as deceased
• The date by which the enrollee or their representative must respond to the notice
• The effective date to which coverage will be terminated, i.e., date of death

* *Note:* Death PDM estate notices will *only* be sent via the United States Postal Service and will *not* be posted electronically to consumers' Exchange accounts.

Death PDM: Sample Initial Notice

Health Insurance Marketplace

DEPARTMENT OF HEALTH AND HUMAN SERVICES
465 INDUSTRIAL BOULEVARD
LONDON, KENTUCKY 40750-0001

Jane Doe
1234 Montgomery Lane
Arlington, VA 22201

June 11, 2019

Marketplace coverage will end for Jane Doe.

Application Date: January 1, 2019
2019 Application ID: 1234567

To the Estate of Jane Doe:

You're getting this notice because our records show that Jane Doe is deceased. This person is still enrolled in a Marketplace plan, but their coverage will end on February 25, 2019.

What should I do next?

If this information is correct, you don't need to take any action at this time. We'll send you another notice after July 11, 2019 to confirm that the Marketplace coverage has ended.

If this information is incorrect because coverage for Jane Doe should end on a different date, call the Marketplace Call Center at 1-800-318-2596 (TTY: 1-855-889-4325).

What if this person isn't deceased?

Complete both of these actions:

1. Call the Marketplace's special support line at 1-833-889-8500 (TTY: 1-833-885-1855). You'll be instructed to leave a voicemail with your name, phone number, and this application ID: 1234567. The Marketplace will contact you for more information.

2. Contact Social Security to report that this person was identified as deceased by mistake. Visit socialsecurity.gov, go to your local Social Security office, or call Social Security at 1-800-772-1213 (TTY: 1-800-325-0778).

For help with these steps, visit HealthCare.gov/help/estate or call the Marketplace Call Center at 1-800-318-2596 (TTY: 1-855-889-4325).

Next Steps for Enrollees Who Are Deceased

- As a reminder, if an enrollee is correctly identified as deceased, **no further action is required from the deceased enrollee or their estate**
  - After 30 days, if there is no response to the Death PDM estate notice, the deceased enrollee's coverage will be terminated retroactively to the effective date listed on the notice, i.e., date of death
  - If the decedent received APTC/CSR to help pay for Exchange coverage, then early the following year the estate will receive the decedent's 1095-A form to use for their federal income tax return
- If the estate believes Exchange coverage should not end on the date provided in the Death PDM initial warning estate notice, the notice directs them to notify the Marketplace Call Center

Next Steps for Enrollees Identified as Deceased in Error

- Enrollees erroneously identified as deceased should take two actions within 30 days
    1. Call the Exchange's special support line at the number provided in the initial warning notice to disagree with the Exchange's notice, and
    2. Contact SSA to correct their data

- When the enrollee calls the Exchange's special support line, the enrollee's coverage will not be terminated

- Additionally, the enrollee will receive a response notice to notify them the Exchange may follow up for more information

What You Should Know and How to Help

- Enrollees who receive a Death PDM estate notice may contact you:
  - For help understanding the Death PDM estate notice
  - For help determining what actions are required of them
- If they are erroneously identified as deceased, enrollees should notify both the Exchange and the Social Security Administration
- If they are receiving the notice, but are no longer enrolled in Exchange coverage, they should contact the Exchange to confirm their Exchange coverage has been terminated
- For consumers requiring help ending Exchange coverage for a deceased enrollee in a multi-member application, see the later slide for instructions on updating their Exchange coverage

What You Should Know and How to Help (Continued)

If consumers contact you upon receiving a Death PDM estate notice…	…you should refer consumers to…
and want to change the termination date for a deceased enrollee's Exchange plan	the Marketplace Call Center.
because they are not deceased	the Exchange's special support line AND the Social Security Administration.

What You Should Know and How to Help (Continued)

- Exchange enrollees are required to report life changes, such as the death of an Exchange enrollee, to the Exchange within 30 days of the event
- Consumers with a deceased enrollee in a multi-member application are required to call the Marketplace Call Center to notify the Exchange of this change and update their application

If a consumer contacts you because someone on their multi-member application is deceased, you can direct them to terminate coverage for this enrollee by:

- Calling the Marketplace Call Center at **1-800-318-2596** (**TTY: 1-855-889-4325**) and telling the call center representative that an enrollee on their application is deceased.

Other Resources

- Death Periodic Data Matching Frequently Asked Questions (FAQ): link forthcoming
- Help page for consumers/estates receiving Death PDM warning notices: https://www.healthcare.gov/help/estate
- HealthCare.gov instructions on ending Exchange coverage: https://www.healthcare.gov/reporting-changes/cancel-plan/
- Sample Death PDM notices: https://marketplace.cms.gov/applications-and-forms/notices.html