

Medicaid/CHIP Periodic Data Matching (PDM): Final Notices



*Financial Help is Ending for
Consumers Enrolled in
Marketplace Coverage with APTC
or CSRs and Medicaid or CHIP*

*Center for Consumer
Information and Insurance
Oversight (CCIIO)*

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Medicaid/CHIP PDM: Final Notices

This presentation will cover:

- A refresher on what's new for Medicaid/CHIP PDM
- How the Medicaid/CHIP PDM final notice affects consumers
- How issuers can help consumers who receive the final notice
- Where issuers can find additional resources

Medicaid/CHIP PDM: Background

- If consumers have been determined eligible for or are enrolled in minimum essential coverage (MEC)* Medicaid or CHIP, they are NOT eligible to receive advance payments of the premium tax credit (APTC) or income-based cost-sharing reductions (CSRs) to help pay for a Marketplace plan premium and covered services.**
- Marketplaces **must**:
 - Periodically examine available data sources to determine whether consumers who are enrolled in Marketplace coverage with APTC or CSRs have been determined eligible for Medicaid or CHIP (45 CFR 155.330(d))***
 - Notify these consumers, and if the consumer doesn't respond to the notice, end APTC/CSRs (45 CFR 155.330(e))
- Medicaid/CHIP PDM identifies consumers enrolled in BOTH Marketplace coverage with APTC or income-based CSRs AND MEC Medicaid or CHIP

**Most Medicaid or CHIP is considered MEC; some forms of Medicaid cover limited benefits (like Medicaid that only covers emergency care, family planning or pregnancy-related services) and are not considered MEC.*

***Note: A consumer who is eligible for income-based CSRs will also be eligible for APTC. However, not all consumers who are eligible for APTC will be eligible for income-based CSRs; income-based CSRs are only available to consumers with household incomes between 100% and 250% of the Federal Poverty Level (FPL), whereas consumers with household incomes between 100% and 400% of FPL may be eligible for APTC. If a consumer still wants a Marketplace plan after having been determined eligible for MEC Medicaid or CHIP, he or she will have to pay full cost for his or her share of the Marketplace plan premium and covered services, if otherwise eligible.*

****Current functionality checks whether a consumer enrolled in Marketplace coverage with APTC/CSRs is enrolled in Medicaid or CHIP. References to the Marketplace refer throughout to the Federally-facilitated Marketplaces (including State Partnership Marketplaces) and State-based Marketplaces using the federal platform.*

Medicaid/CHIP PDM: New Functionality

- In this round of Medicaid/CHIP PDM, the Marketplace is ending APTC/CSRs for consumers* found to be enrolled in Marketplace coverage with APTC/CSRs *and* MEC Medicaid or CHIP, who didn't respond by the date specified in an initial warning notice.
- In August 2016, the household contact for dually-enrolled consumers was sent an **initial warning notice**, requesting that they take action by the date listed in the notice to end Marketplace coverage with APTC/CSRs, or update their application to tell the Marketplace that they're not enrolled in Medicaid or CHIP.
- This month, a **final notice** is being sent to the household contact for consumers who did not respond by the date specified in the initial warning notice, to inform affected consumers that the Marketplace has ended any APTC/CSRs being paid on their behalf. Their Marketplace coverage will continue without financial help, and eligibility for APTC/CSRs has been redetermined for anyone else on the Marketplace plan, if applicable. The final notice provides the date that these changes become effective. An updated Eligibility Determination Notice (EDN) has also been sent for all consumers in the household.
- All notices are mailed/posted to consumers' online Marketplace accounts, depending on what the consumer selected as his or her communication preference.

**Due to technical limitations, dually-enrolled consumers in the following Marketplace states will not receive notices in the Summer 2016 round of Medicaid/CHIP PDM: GA, NH, NJ, and WY. Consumers in these states will not be affected by this round of Medicaid/CHIP PDM.*

Medicaid/CHIP PDM:

Final Notice

- This month, the Marketplace is sending a **final notice** to the household contact for consumers who did not take action by the date in the initial warning notice, to inform him or her that the Marketplace has ended financial help being paid on the consumer's behalf, alert the household contact of the date on which Marketplace coverage without financial assistance will become effective, and provide instructions for next steps, such as ending Marketplace coverage, confirming whether or not the consumer is enrolled in Medicaid/CHIP, and appealing the Marketplace's decision.
- The dually-enrolled consumers will remain enrolled in Marketplace coverage at full cost.

IMPORTANT: If consumers don't want to pay full cost for their share of the Marketplace plan premium and covered services, they'll need to end their Marketplace coverage **immediately**.

- For any other household members on the application who were not found to be dually-enrolled, Marketplace coverage will continue. The Marketplace has redetermined their eligibility for APTC/CSRs, if applicable.
- The Marketplace is also sending an updated EDN to inform the household of the change in financial help.

Medicaid/CHIP PDM: Final Notice Sample

August 16, 2016

Application date: December 5, 2015

Application ID: 123456789

Dear Mary:

IMPORTANT: People in your household are still enrolled in a Marketplace plan but will no longer receive financial help for their coverage.

You're getting this notice because the people listed below will no longer get advance payments of the premium tax credit and income-based cost-sharing reductions, if applicable, to help pay for their coverage through a Marketplace health plan. They will still have a Marketplace health plan, but financial help will not be paid for their share of the Marketplace plan premium.

- John Doe
- Jane Doe
- Jimmy Doe

This change will be effective on October 1, 2016. **If you don't want to pay full cost for their share of the Marketplace plan premium and covered services, you'll need to end their coverage immediately. See "Next steps" below.**

For anyone on the Marketplace plan who isn't listed above, their Marketplace plan will continue and their eligibility for advance payments of the premium tax credit and cost-sharing reductions, if applicable, is redetermined. Your tax household is eligible for a tax credit of \$0 each month, which is \$0 for the year. Contact your plan to find out your share of the total premium amount, after this tax credit.

What Issuers Should Know: How to Help

Consumers who receive the Medicaid/CHIP PDM final notice may contact issuers:

- For help understanding the notice
- For help ending Marketplace coverage
 - See “Other Resources” slide for instructions on ending Marketplace coverage when a consumer gets Medicaid or CHIP
- If they don’t think they’re enrolled in Medicaid or CHIP; aren’t sure they’ve been determined eligible for or they’re enrolled in Medicaid or CHIP; OR aren’t sure if their Medicaid/CHIP qualifies as MEC
 - Consumers may wish to contact their state Medicaid/CHIP agency to confirm their eligibility/enrollment status (instructions in notice); consumers can then take action based on their Medicaid/CHIP eligibility/enrollment status (e.g. ending Marketplace coverage; appealing the Marketplace’s decision)
- If they disagree with the Marketplace’s decision
 - Information about appeals is in the notice

Medicaid/CHIP PDM: Estimated Timeline*

- **Early August 2016:** Initial warning notices sent to consumers who may be dually-enrolled, as identified through Medicaid/CHIP PDM.
- **Early September 2016:** Marketplace ends APTC/CSRs for consumers who did not take action by the date specified in the initial warning notice; final notices sent to affected consumers to inform them of the change in their financial assistance. Updated EDN also sent to these households.
- **October 1, 2016:** Marketplace coverage without financial assistance becomes effective for affected consumers.

**All dates subject to change*

Other Resources

- Sample Initial Warning Notice
 - English: <https://marketplace.cms.gov/applications-and-forms/pdm-initial-warning.pdf>
 - Spanish: <https://marketplace.cms.gov/applications-and-forms/pdm-initial-warning-spanish.PDF>
- Sample Final Notice
 - English: <https://marketplace.cms.gov/applications-and-forms/pdm-ending-financial-help.pdf>
 - Spanish: <https://marketplace.cms.gov/applications-and-forms/pdm-ending-financial-help-spanish.pdf>
- HealthCare.gov instructions on ending Marketplace coverage when a consumer gets Medicaid or CHIP: <https://www.healthcare.gov/medicaid-chip/cancelling-marketplace-plan/>
- HealthCare.gov general instructions on ending Marketplace coverage: <https://www.healthcare.gov/reporting-changes/cancel-plan/>
- List of Medicaid programs that aren't considered MEC: <https://www.healthcare.gov/medicaid-limited-benefits/>