



# Maintenance Reason Codes for Stop APTC/QHP for Dual Enrollees in Medicare and the Exchange



*Consumer Information &  
Insurance Oversight (CCIIO)*

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*<https://www.regtap.info/FFENR.php>*

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# Medicare Periodic Data Matching (PDM) & Dual Terminations

## Background:

- Beginning in January 2019, the FFE now has the functionality in place to automatically end APTC/CSR for Exchange enrollees that are dually enrolled in Medicare and the Exchange.
- Additionally, the FFE will also end Exchange coverage for dual enrollees who permit the FFE to act on their behalf and end their coverage if they are found to be dually enrolled in Medicare and the Exchange at a later date.

# Medicare (PDM) & Dual Term Notices

The FFE sent initial warning notices in mid-February notifying these enrollees that our records show they are dually enrolled in Medicare and Exchange coverage and have 30 days to either end their APTC/CSRs or Exchange coverage if they do not want to pay full price for their Exchange plan.

If the consumer doesn't respond to the notice within 30 days, then the FFE will either end:

- APTC/CSRs (45 CFR 155.330(e)) or
- Exchange coverage if the consumer permitted the Exchange to act on their behalf to end coverage if later found to be dually enrolled in Medicare and the Exchange (45 CFR 155.430(b)(1)(ii)).

# Enrollee Options for Medicare (PDM) & Dual Term

## Enrollees have the option to either:

- Resubmit their application if they believe they are not enrolled in Medicare
  - Consumer(s) who return to their application and resubmit it with an attestation that they do not have Medicare will likely receive a Medicare data matching issue (DMI) and will have 90 days to resolve. After the 90 day window elapses, the FFE will then take action to end APTC, depending on consumer preference, if the consumer does not confirm that s/he is not eligible for MEC Medicare.
- Change their termination attestation response from agree to disagree.
  - For consumer(s) who previously granted but now revoke permission for the FFE to end QHP coverage on their behalf, the FFE will proceed to end APTC/CSR after the 30 days elapses.

For enrollees who do not take action by mid-March, the FFE will send final warning notices in early April explaining the upcoming change to enrollees' APTC or Exchange coverage, the date such change will become effective, and what they can do next.

# Medicare (PDM) & Dual Term Transactions

For dual enrollees who do not take action by mid-March, the FFE will send issuers the below transactions (as applicable) in April, effective May 1.

Action	Transaction	Maintenance Type Code	Maintenance Reason Code	Additional Maintenance Reason Code
STOPAPTC	M834	001	NULL	FINANCIAL CHANGE
STOPQHP	834	024	14	TERM-OTH-COVERAGE

# Resources

- Medicare Periodic Data Matching (PDM)  
Frequently Asked Questions –February 19, 2019
  - <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Downloads/Medicare-PDM-FAQ.pdf>
- Medicare PDM Notices (March 2019)
  - English: <https://marketplace.cms.gov/applications-and-forms/medicare-pdm.zip>
  - Spanish: <https://marketplace.cms.gov/applications-and-forms/medicare-pdm-spanish.zip>