

Phase 3 EDE partner Multi-Tax Household Guidance

Most financial assistance applications for health coverage include one tax filer or two married tax filers filing jointly. However, there are less common applications scenarios in which a household may file more than one tax return (examples: domestic partners, parents with adult children who file taxes and are not claimed as dependents). We call these cases “multi-tax households.” These applications can be successfully submitted from an EDE partner to Submit App, but the Submit Enrollment API will return an error if there are multiple households within one enrollment request. The API error message will appear as “UserNotAuthorized”.

Phase 3 EDE partners may take the following steps to help prevent the receipt of this Submit Enrollment error:

- Provide educational content prior to application creation about who should apply together on one application. Information about who to include in a household is available at <https://www.healthcare.gov/income-and-household-information/household-size/>. In many cases, each tax filer should complete a separate application while listing any household members outside their tax household as non-applicants. For reference and examples see:
 - o <https://marketplace.cms.gov/technical-assistance-resources/best-practices-for-assisting-consumers.pdf>;
 - o https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Downloads/Complex_Sits_Webinar_FINAL.pdf.
 - o <https://marketplace.cms.gov/technical-assistance-resources/training-materials/advanced-issues-and-technical-support.pdf>
 - o <https://marketplace.cms.gov/technical-assistance-resources/family-household-composition-section.pdf>
- Program logic into the EDE partner’s UI to identify multi-tax household situations. After consumers have completed the household composition section of the application (where tax filing status has been collected), the EDE partner will be able to identify a multi-tax household following the Update App API call by determining if there are multiple instances of a “yes” response for the “taxHouseHoldStatus” indicator. In cases where more than one “yes” response is identified, messaging may be displayed to direct one of the application’s tax filers to submit a separate application.

Beginning on May 10, 2019, in UAT0, and on July 26, 2019, in production, a new indicator will be available in the Update App, Add Member, Get App, Submit App API responses called the multiTaxHouseholdIndicator. This is an optional indicator intended to help EDE partners more easily identify multi-tax households for consumer warning messaging and eligibility results page messaging. When the multiTaxHouseholdIndicator is set to true, it means that there are multiple tax filers who are not filing jointly, and who are not claimed as dependents.

Sample consumer messaging:

It looks like there are multiple tax filers on this application that file separate tax returns. You may need to have one of the tax filers submit their own application for anyone on their tax return who needs health

coverage. *Click here to change your answer about who is seeking coverage on this application. If you need assistance creating a separate application, please call our call center at XXX-XXX-XXXX or contact the Marketplace Call Center at 1-800-318-2596.*

Guidelines on implementing consumer messaging and content around multi-tax household applications:

- 1) EDE partners are not permitted at this time from blocking submission or progression of multi tax household applications. If a consumer chooses to continue their application with the multi-tax household present, then the eligibility results displayed to the consumer must include information about how the consumer can get help from DE Partner help channels or the Marketplace Call Center in order to file separate applications for each tax filer (see screenshot below). In the Fetch Eligibility response, a partner can identify multiple tax households by checking the InsuranceApplicationMultipleTaxHouseholdIndicator.

Required action: View your eligibility notice

Your "Eligibility Results" contain important information about your Marketplace coverage, including your eligibility for coverage, costs, deadlines, and next steps.

Important: If you're eligible for coverage through a Marketplace plan, call the Marketplace Call Center at 1-800-318-2596 (TTY: 1-855-889-4325). We'll help you get everyone enrolled, since your household files more than one federal income tax return.

VIEW ELIGIBILITY NOTICE (PDF)

The DE partner can choose whether to direct consumers to the Marketplace call center or to train their own call center to assist consumers in this scenario. Here is the basic script that Marketplace call center representatives begin with for consumers who call after receiving the message above:

It looks like your application includes household members who file a separate tax return. They must complete a separate application for coverage if they want financial help with their premium. I can help you in removing anyone on your application who files their own tax return. We can then complete a separate application for them.

If you don't want to be considered for financial help or don't believe you're eligible for a premium tax credit, you can put everyone on one application.

- 2) EDE partners should note that there are many complex tax and household scenarios in which consumers are able to successfully progress through the application and enrollment process. These include situations when a tax filer's dependent(s) also file their own tax return, when household members are present who neither file taxes nor are claimed as a dependent, and situations when non-applicants fall into separate tax households or when all application members are eligible for Medicaid/CHIP. In all these situations, consumers are able to successfully progress through the application and enrollment process, and Phase 3 EDE partners must ensure they have a pathway to do so.