

2016 Process for Renewing Enrollees with Hardship Exemptions



*Center for Consumer
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In the 2016 Plan Year, the Marketplace will use the same auto-reenrollment rules for catastrophic enrollees with an exemption as 2015:

- Enrollees who are enrolled in catastrophic coverage, who are age 30 or over by 1/1/16 (or are part of an enrollment group that includes someone who is age 30+) will be auto-reenrolled into the “Age Off” plan indicated by the issuer in the Plan ID Crosswalk Template
- Enrollees who are under age 30 on 1/1/16 will be auto-reenrolled in the catastrophic plan

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- Accordingly, issuers should indicate the age off plan in the 2016 reenrollment notice for catastrophic enrollments with a member age 30+ as of 1/1/16
 - Enrollment groups under the age of 30 on 1/1/16, should have the catastrophic plan indicated as the renewal plan
 - Existing Guidance: “In addition to providing the renewal notice, issuers are encouraged to include a cover note indicating that consumers may return to the Marketplace to apply for a new hardship exemption and enroll in catastrophic coverage if eligible.”

https://www.regtap.info/uploads/library/ENR_AutoRenewCatastrophic_100114_5CR_100614.pdf

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Enrollees who are enrolled in a catastrophic plan, age 30+ with an ECN can actively reenroll in a catastrophic plan:

- Catastrophic enrollees 30+ who want to reenroll in a catastrophic plan must actively return to Healthcare.gov or the Call Center to enter a valid Exemption Certificate Number (ECN) , apply & enroll
- Most 2015 ECNs expire 12/31/15, so eligible enrollees may need to re-apply for an exemption and enter the ECN they receive in the Exemptions section of their Marketplace Account (see <https://www.healthcare.gov/fees-exemptions/exemptions-from-the-fee/#hardshipexemptions>)
 - Secretary’s Hardship Exemption (enrollees in coverage gap) can be determined in real-time on Healthcare.gov, with the ECN indicated in the Eligibility Determination Notice and catastrophic plans available
- Functionality constraints prevent enrollees, age 30+ who are enrolled in a catastrophic plan, with multi-year ECNs from being auto-reenrolled into catastrophic; they must actively return to the Marketplace reenroll in a catastrophic plan.

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Exemptions in Marketplace Account

The screenshot shows a user interface for a Marketplace Account. At the top, there is a dark blue header with a back arrow, the text "2015 application for Individuals & Families (ID#: 121751980)", and a link "View all applications". On the left side, there is a navigation menu with several options: "My plans & programs", "Eligibility & appeals", "Applications details", "Report a life change", "Communication preferences", "Authorized users", "Exemptions" (which is highlighted with a blue bar), and "Tax forms". The main content area is titled "Exemptions" and contains a paragraph explaining that if you applied for an exemption that may qualify you for Catastrophic coverage, you can report your exemption certificate number. Below this is a section titled "Report an exemption" with a green button labeled "ADD EXEMPTION". Underneath, there is a section titled "My Exemptions" which contains a table with one row of data and a "REMOVE" button.

2015 application for Individuals & Families (ID#: 121751980) View all applications

- My plans & programs
- Eligibility & appeals
- Applications details
- Report a life change
- Communication preferences
- Authorized users
- Exemptions**
- Tax forms

Exemptions

If you applied for an exemption that may qualify you for Catastrophic coverage, you can report your exemption certificate number which will allow you to shop for and enroll in Catastrophic plans.

Report an exemption

If you received a notice for a hardship exemption that may qualify you for catastrophic coverage, you can enter the Exemption Certificate Number from your notice for each person with an exemption. For each person that qualifies, the Exemption Certificate Number is located in the "Eligibility Results" column of your notice. After you add an exemption(s) and complete your application, you can shop for Catastrophic plans for the people who qualify.

ADD EXEMPTION

My Exemptions

Person	Date of birth	Type	Effective dates	
John Carson	06/19/1961	Hardship	01/01/2015 - 12/31/2015	REMOVE

Partial Months of Coverage Policy Examples

Example 2: -Removal-

- Policy effective 1/1/2015; Full month total premium of \$300 (\$10.50 user fee), APTC of \$200, and advance CSR of \$50 was sent by the FFM to FFM issuer on the initial 834.
- Enrollment group terminates effective 3/12/2015; FFM sends termination 834 ending coverage effective 3/12/2015.
- FFM issuer calculates the partial month amount of premium, APTC, advance CSR, and user fee using the end dates contained in the 834 transaction. For March, the partial month payment amounts should be:
 - Premium ($\$300/31 \text{ days}$) * 12 days of coverage = \$116.13
 - APTC ($\$200/31 \text{ days}$) * 12 days of coverage = \$77.42
 - Advance CSR ($\$50/31 \text{ days}$) * 12 days of coverage = \$19.35
 - User fee ($\$10.50/31 \text{ days}$) * 12 days of coverage = \$4.06