



Rock Enroll!

Ready to Enroll and Renew PY 2024



October 2023

This information is intended only for the use of entities and individuals serving as Navigators, certified application counselors, or non-Navigator assistance personnel in a Federally-facilitated Marketplace. The terms "Federally-facilitated Marketplace" and "FFM," as used in this document, include FFMs where the state performs plan management functions. Some information in this presentation may also be of interest to individuals helping consumers in State-based Marketplaces and State-based Marketplaces using the Federal Platform. This material was produced and disseminated at U.S. taxpayer expense.

Agenda

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Reminders

Enhanced Premium Tax Credits Still in Effect

- The Inflation Reduction Act (IRA) was signed into law on August 16, 2022.
- This law extended through Plan Year (PY) 2025 the enhanced premium tax credits initiated under the American Rescue Plan Act of 2021 (ARP).
- This means that for 2024, many Marketplace consumers will have available to them \$0 premium plans when using their premium tax credits. And consumers with household income above 400 percent of the federal poverty line may qualify for premium tax credits as well.
- Whether each consumer qualifies for a premium tax credit depends on how their household income compares to the costs of plans in their area. There is not one set household income limit that applies to everyone, but consumers can check [Healthcare.gov/see-plans/#/](https://www.healthcare.gov/see-plans/#/) to test outcomes for household income levels in their area.

Reminder: Issuers will send consumers renewal notices which generally provide an estimate of APTC for the next plan year based on the previous plan year. The consumer's actual APTC will appear on their eligibility determination notice (EDN) from the Marketplace as well as on their January bill.

SEPs During Open Enrollment

- Remember that consumers you see during OE may be seeking coverage for the remainder of PY 2023 in addition to enrolling for 2024. Below are some scenarios you may encounter:
 - A consumer is losing employer-based coverage on November 30 and wants coverage for December
 - A consumer recently had a baby and wants to add the child to their existing policy
 - A consumer recently moved from another state
- Review the resources on SEPs at [CMS.gov/marketplace](https://www.cms.gov/marketplace) to ensure you are ready to help consumers in these common situations.



Medicaid Unwinding SEP

- Marketplace-eligible consumers on the federal platform who submit a new application or update an existing application between March 31, 2023, and July 31, 2024, and attest to a last date of Medicaid or CHIP coverage within the same time period, are eligible for an Unwinding SEP.
- For consumers who attest to a loss of Medicaid or CHIP coverage in the past, Marketplace coverage will start the first of the month following plan selection. For example, if a consumer selects a plan on August 25, coverage will start September 1.
- For consumers who attest to a future loss of Medicaid or CHIP coverage, Marketplace coverage will start the first day of the month after their last day of Medicaid coverage.

Medicaid/CHIP Coverage End Date	Date of Marketplace Plan Selection	Marketplace Plan Effective Date
July 31, 2023	November 20, 2023	December 1, 2023*
December 31, 2023	December 20, 2023	January 1, 2024

*In this situation, you would help the consumer complete applications for both PY2023 and PY2024.

150 Percent of the FPL SEP

- APTC-eligible consumers in the Marketplaces on the federal platform with a projected annual household income at or below 150 percent of the FPL are eligible for a monthly SEP to enroll in a qualified health plan (QHP) or change from one QHP to another.
- This SEP will continue to be available until December 31, 2025.



Updated Policies/Guidance

Job-based Coverage Affordability Rules

- Before Plan Year 2023, a job-based plan was considered affordable for all family members to whom an employer's offer extends if the premium for the employee's self-only coverage was affordable. The premium required to cover any family members was not taken into account.
- The Internal Revenue Service (IRS) issued new regulations that applied starting in Plan Year 2023. If a consumer has an offer of employer coverage that extends to their family members, the affordability of employer coverage for those family members will be based on the family premium amount, not the self-only employee premium cost.
- For 2024, a plan is considered "affordable" if the plan's premiums do not exceed 8.39 percent of the employee's household income.
- This lower percentage (8.39 percent for 2024 vs. 9.12 percent for 2023) means that some consumers who have offers of employer coverage may be newly eligible for APTC.



Income DMI 60-day Extension

- Effective June 18, 2023, consumers have an additional 60 days (for a total of 150 days) to resolve an income-related Data Matching Issue (DMI), at the option of the Exchange.
- If a consumer receives a notice asking for additional supporting documents to resolve a DMI, the notice will indicate how long the consumer has to submit them and receive a final eligibility determination.



Failure to File and Reconcile (FTR)

The 2024 Payment Notice revised the FTR policy to terminate APTC when enrollees fail to file taxes and reconcile APTC for two consecutive tax years, rather than one tax year, beginning with re-enrollment for PY2025.

- Consumers will not lose APTC for PY2024 for failure to file and reconcile
- Consumers are still required to file and reconcile taxes for any year in which they receive APTC and should be encouraged to file their taxes as soon as possible if they haven't already
- When a consumer reenrolls for PY2025, if data from IRS indicates the consumer did not file and reconcile for tax years 2022 and 2023, the consumer will lose APTC



Unsolicited Door-to-Door Application and Enrollment Assistance

The 2024 Payment Notice changed regulations regarding outreach activities. You may now conduct outreach and education activities as well as application and enrollment assistance by going door-to-door or through other unsolicited means of direct-contact, like direct phone calls to consumers' homes. Direct contact activities may include:

- Providing brochures and informational materials about the FFMs.
- Providing information on the annual FFM redetermination process.
- Informing consumers of application and enrollment assistance provided by your organization.
- Providing application or enrollment assistance.



However, you must make sure that you're complying with any other federal, state, or local laws that may apply to these interactions. Also, for safety purposes, we recommend assisters conduct door-to-door activities in groups of two or more.

Q&A

