



First Friday Forum

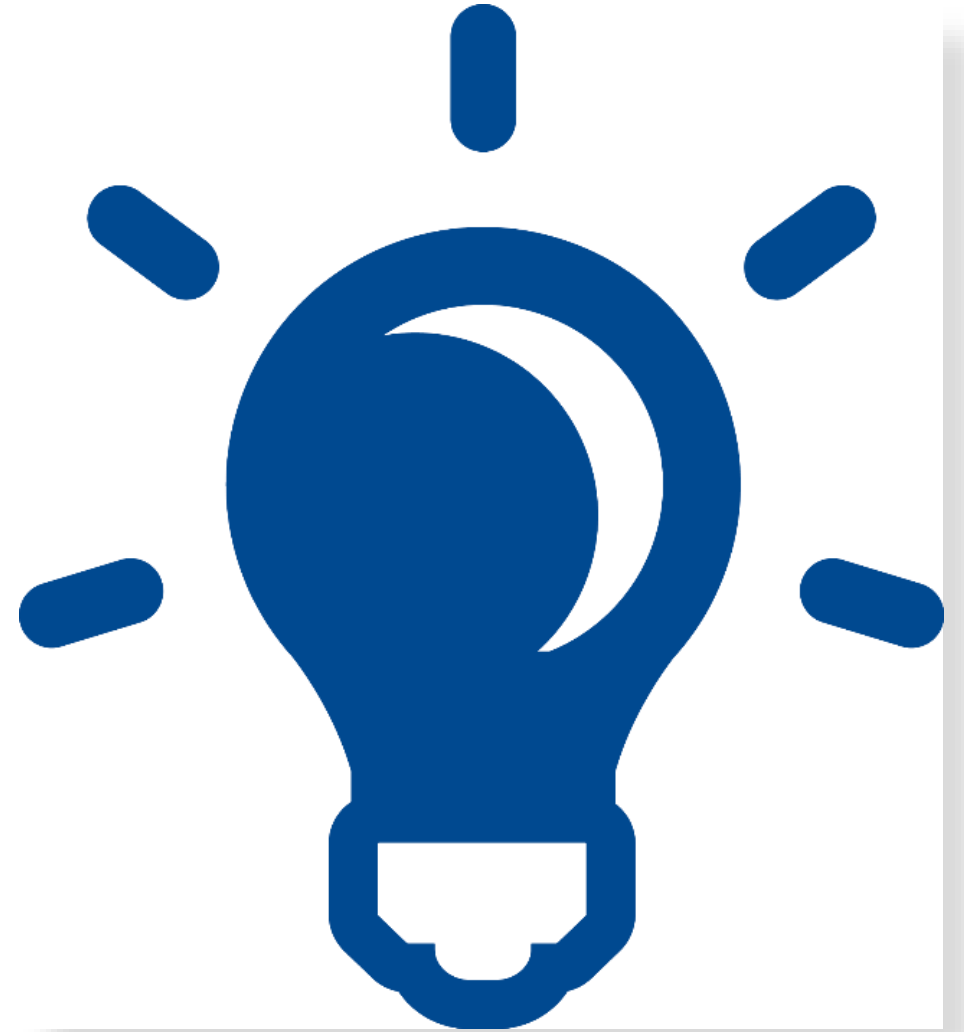
May 7, 2021

Christine Brown (she/her)
Navigator Resource Manager

Question for the Month

You are working with a client who did receive unemployment income in 2021. They are currently working.

What criteria do they have to meet to be eligible for those maximum tax credits and cost sharing reductions afforded to them by the American Rescue Plan?



Molina Update

- Qualified Health Plans

Wednesday, May 5th, “Insufficient Documentation” notices were sent to any perspective member that enrolled for coverage beginning 05/01/2021. These messages/requests were triggered in error as a result of our enrollment and billing transition over to WIPRO (HPS).

Per WAHBE guidelines, Molina Healthcare of WA will not be requiring any Qualifying Life Event (QLE) validation documentation for the duration of the Public Health Emergency SEP, running until August 15, 2021.

We apologize for any concern or confusion these communications created. No action is required of you or your client(s) to provide any documentation supporting a QLE at this time.



ARPA – enhanced and extended federal subsidies

- Higher Advanced Premium Tax Credits (APTC) = Lower premiums for those who enroll in Exchange coverage through Washington Healthplanfinder
 - Reduces the share of income customers are expected to contribute towards the premium
- Expands APTC for those currently receiving subsidies and extends APTC to those over **400% who have not** been receiving subsidies. Customers must report their income to receive this assistance (2021 & 2022)
- People who report getting UI benefits for at least 1 week in 2021, will receive maximum available federal premium and cost-sharing assistance, regardless of projected or actual annual income (2021 only)
- People who would typically owe money to IRS when they file their 2020 taxes for an APTC overpayment in 2020 are receiving payment forgiveness from IRS (2021 only)

Opportunities for Customers

Washington Healthplanfinder Currently Enrolled	<ul style="list-style-type: none"> • May be eligible for new or larger tax credits. • May be eligible to switch plans to take advantage of increased tax credits. • Those with unemployment income have access to increased tax credits and cost-sharing reductions.
COBRA Enrollees	<ul style="list-style-type: none"> • COBRA Premiums should drop to zero through September 2021. • Past employer administers
*Uninsured	<ul style="list-style-type: none"> • May be eligible for subsidies. • May also be eligible for COBRA subsidies. • If eligible for both should compare premiums and cost-sharing and consider continuity with current coverage and post-September.
*Off Exchange Enrollees	<ul style="list-style-type: none"> • May be eligible for large (or full) subsidies for similar coverage on Exchange.

*Must be enrolled through *Washington Healthplanfinder* to receive expanded tax credits, and each month spent uninsured or insured through the commercial market is a month that will never be subsidized.

Special Enrollment Period (SEP) Guidance

Client reports a qualifying life event (QLE) or experiences a QLE (example: cost-sharing reductions tier change) when they receive their updated tax credit amount.

- In most cases, a SEP will automatically open that will allow the client to shop. Some QLEs will have metal level restrictions when shopping, though nearly all will allow your client to shop silver plans.
 - Some households may not have the SEP automatically opened based on their unique circumstances or application updates. **This is especially true for the over 400% FPL who are becoming newly eligible for tax credits.**
 - For these clients, clicking the “Shop Plans” button will open up the special enrollment questionnaire. Make sure to check the box for “Someone in my household is now eligible for tax credits and has had coverage within the last 60 days”.

Special Enrollment Period Guidance (con't)

Changes in circumstance:

- ☐ Denied Washington Apple Health (Medicaid)
- ☐ Gained citizenship or lawful presence in the U.S.
- ☐ Is a survivor or victim of domestic violence or spousal abandonment, or is a dependent of one, and had coverage in the last 60 days
- ☐ Someone in my household is now eligible for tax credits and has had coverage within the last 60 days.

Changes in income or taxes:

- ☐ Added or removed a member from the tax filing household

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Special Enrollment Period Guidance (con't)

Client's tax credits are updated due to the American Rescue Plan Act. Client wants to change their plan within the same carrier. Client does not have a SEP or the SEP has metal level restrictions.

- Follow your line of support to request a ticket.
 - Include the full plan name your client would like to enroll in. Use the "Browse and Compare Plans" tool on Washington Healthplanfinder's homepage to review available plans.
 - Include preferred enrollment start date for new plan. Requested start dates approved on a case-by-case basis.

Invoices, Payments and Out of Pocket Expenses

- Tax Credit redeterminations will be completed by May 15th
- Invoices will go out before the redeterminations are complete
- For payment questions customers should contact their carrier
- For accumulators (deductibles and out of pocket expenses) to transfer to new plan, contact their carrier
- See American Rescue Plan Act Carrier Practices handout



Answer to Question of the Month

You are working with a client who did receive unemployment income in 2021. They are currently working.

What criteria do they have to meet to be eligible for those maximum tax credits and cost sharing reductions afforded to them by the American Rescue Plan?

As long as an individual meets all criteria to receive tax credits (legal presence, if married they file taxes jointly, have not been offered or receive affordable ESI) they will receive APTCs and CSRs. If affordable for the employee and ESI is offered to family members, they are not eligible for this subsidy.



Appendix



Additional Resources for Income Support

- Coronavirus FAQs:
 - <https://www.wahbexchange.org/new-customers/coverage-basics/coronavirus-faqs/>
- American Rescue Act Plan FAQs:
 - <https://www.wahbexchange.org/new-customers/coverage-basics/american-rescue-plan-faqs/>
- Reporting Unemployment Income:
 - <https://www.wahbexchange.org/reporting-unemployment/>
- KFF calculator for 2021 APTC and net premiums under the American Rescue Plan:
 - <https://www.kff.org/interactive/subsidy-calculator/>
- KFF calculator for 2021 APTC and net premiums before the American Rescue Plan:
 - <https://www.kff.org/interactive/subsidy-calculator-2021-before-covid-relief/>
- GetInsured calculator for the impact of the broad-based PTC increase:
 - <https://mypremiumsubsidy.com/screener/american-rescue-plan.html#/>

If I am eligible for employer-sponsored insurance, am I eligible for the new premium savings under ARPA?

- If you are eligible for employer-sponsored health insurance with a premium that costs less than 9.83% or less of your household income, then you will not be eligible for premium tax credits (Note: ARPA did not fix the 'family glitch').
- If you are eligible for employer-sponsored health insurance that is more expensive, you may be eligible for enhanced tax credits under the American Rescue Plan

How does COBRA coverage compare to *Washington Healthplanfinder* coverage?

- The biggest drawback with COBRA is usually the cost for laid-off workers, which can be thousands of dollars a month. ARPA addresses this through September.
 - More information at: <https://www.dol.gov/agencies/ebsa/laws-and-regulations/laws/cobra/premium-subsidy>
- Those who lose their employer sponsored coverage can keep their current doctors and health-care providers through COBRA. If someone has already met their deductible for the year, maintaining workplace insurance could be an affordable option.
 - When your COBRA assistance runs out, you may be eligible for a special enrollment period to enroll in coverage through *Washington Healthplanfinder*.
- Those who lose employer coverage can also find a plan on *Washington Healthplanfinder*
 - Will likely qualify for free or very low-cost coverage through *Washington Healthplanfinder* **especially if they** collected unemployment insurance during at least 1 week in 2021.
 - Can search available plans by preferred health care provider.
 - Can enroll in silver plan – with minimal premium and low out-of-pocket expenses.
 - As a result, options through *Washington Healthplanfinder* plan may be a better deal



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