

Open Enrollment is the time of year when anyone can newly apply for coverage, current members' coverage is renewed for the upcoming year, and everyone can shop and change plans for the new coverage year.

The Health Connector's Redetermination and Renewal Processes are activities that occur each year, over several months, before and during the Open Enrollment Period.



Many of the processes and timelines for Open Enrollment 2022 will be the same as previous years. However, this year there will be some operational changes in consideration of the ongoing Federal Public Health Emergency and CMS guidance

Special Considerations for Coverage Year 2022:

Loss of Subsidies

- More individuals than usual may see an “unknown” income for 2022, which results in loss of Health Connector subsidies.
- This is due to more individuals having amended 2020 tax returns, which causes the income to reflect as “unknown” when the Health Connector performs a data check.
- If you are working with a member whose account shows “unknown” income, edit their application and walk through the income section to confirm everything is up to date, then resubmit the application.
- These members will likely receive a request for income verification after you submit the application. Please remind members to send this proof as soon as possible to ensure they maintain their subsidies into 2022.

Failure to Reconcile Changes

- Members that fail to reconcile (FTR), will not lose tax credits in 2022.
- The IRS has instructed taxpayers who would have owed excess APTC to not include Form 8962 with their income tax filing for 2020, which would normally result in FTR being reported to the Health Connector.

- This year, the IRS will not send FTR indicators and the Health Connector will not use FTR as part of its renewal process.
- Members and applicants should file Form 8962 with their taxes for 2020 if they believe they should receive additional premium tax credits beyond what they received in advance.
- Relief from tax credit reconciliation was limited to the 2020 tax year only, so they should plan to file Form 8962 with their 2021 taxes in the spring.
- To read more about guidance recently issued by CMS regarding healthcare.gov's approach to FTR, please visit <https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/FTR-flexibilities-2021-and-2022.pdf>

Mixed Households

- This year, members who are part of mixed households (households with both Health Connector & MassHealth members) will receive a preliminary eligibility notice from the Health Connector and may receive a renewal form from MassHealth.
- MassHealth will maintain coverage for individuals during the COVID-19 **federal public health emergency**, and through the end of the month in which such federal public health emergency period ends, as defined by current federal guidance. (*Review federal guidance and MassHealth Tiers.*)
- However, members with time limited HSN, HSN Dental only, CMSP only, and CHIP aged-out individuals will not be eligible for continuous coverage through the public health emergency. These members will downgrade or terminate based on regular program determination rules.
- Encourage members to update their applications for 2021 and 2022 and return or respond to any notice received from the Health Connector or MassHealth.

American Rescue Plan Unemployment Benefits

- Due to the American Rescue Plan, \$0 ConnectorCare plans are available through end of 2021 for those who've received unemployment income during 2021 when they get their coverage through the Health Connector.
- Those currently receiving unemployment benefits or who received benefits in 2021 who were enrolled in a no- or low-monthly cost ConnectorCare plan may see a preliminary eligibility notice for an unsubsidized plan in 2022. This is due to the expiration of help provided through the American Rescue Plan at the end of 2021.
- Enhanced subsidies for all enrollees, including those over 400% FPL will continue through 2022.

Income

- Over the last couple of years, many in Massachusetts experienced job loss or reduction of hours due to the pandemic.

- A number of these people filed for unemployment and completed an application for health insurance benefits, or they updated their application with their new income information.
- Many people have had income changes and still need assistance making corrections to their applications.
- When helping consumers apply for coverage or update their accounts during this time, you may see different types of income that came from the Federal government's response to the pandemic:
 - Unemployment Income
 - "Recovery rebates" or "Stimulus payments"
 - Federal Pandemic Unemployment Compensation \$300 unemployment "bumps" that ended in September (see sample benefit statement)
- As always, unemployment income must be included on the online application for coverage.
- Any "Recovery rebates" or "Stimulus payments" received do not count for income purposes and do not need to be included in the online application.
- However, MassHealth and the Health Connector count the Federal Pandemic Unemployment Compensation \$300 unemployment "bump" differently.

Requests for Information

- Starting the first week of July, the Health Connector began closing out approximately 90K requests for information (RFIs).
- Individuals with older RFIs outstanding received a reminder letter in early June, and many individuals received RFIs when the system redetermined their new tax credit amounts under the ARP this Spring.
- As a reminder, applicants and members have 90 days to respond to an RFI and submit eligibility verifications.
- Members can see what documents they owe on the application summary screen in HIX. For more information on how to help applicants and member submit RFI's go to: <https://www.mahealthconnector.org/verification-documents>

Health Connector Redeterminations and Renewals Review:

- In August and September, the Health Connector makes a preliminary eligibility determination for actively enrolled Health Connector members and Health Connector members who are part of mixed households.
 - Mixed households are households that have both Health Connector members and MassHealth members.
- Available federal and state data sources are used to check for income and other factors.
- If a member has income that **was verified with documents provided by the member within the last year**, that income will be used to determine eligibility for 2022 coverage.

- If the household **has not verified their income in the last year** and data sources are incompatible, Health Connector will make the determination using available electronic data sources.
- If household has not verified their income in the last year and data sources are **compatible with the income we are using**, we will continue to use the current (attested) income to determine eligibility for 2022.
- If there is no available data about a member, we will not be able to determine eligibility for MassHealth or Health Connector.
- If someone is projected to lose subsidies for 2022, edit their application and walk through the income section to confirm everything is up to date, then resubmit the application.
- Members who have **outstanding verifications** should send them as soon as possible, as the verified information will help create the most accurate 2022 eligibility.
- Members who owe verifications when their preliminary eligibility is determined may see **changes on their 2022 eligibility** online and in their notice.
- **Notices** with the results of the preliminary eligibility determination are **sent in August and September** to all Health Connector enrollees that applied for financial assistance.
 - Households with only Health Connector members will get:
 - Health Connector Preliminary Eligibility notice
 - Mixed Households will receive either a:
 - Health Connector Preliminary Eligibility notice (for Mixed Households who can be auto-renewed); or a
 - Combined (co-branded) Health Connector and MassHealth notice for Mixed Households with a MassHealth pre-populated form (for those Mixed Households who cannot be auto-renewed).
 - Remember, as the Public Health Emergency continues, current MassHealth members will not be downgraded; however, they may be asked to complete a renewal online or return a renewal form.
 - Encourage all members to update their applications for 2021 and 2022, and return or respond to any notice received from the Health Connector or MassHealth
 - Depending on the type of household you are working with, the review period is between 30 – 45 days.
- **In October a Final Eligibility and Renewal notice is sent to All households** with at least one eligible and enrolled Health Connector health plan member that continues to be eligible for a Health Connector plan the following year.
 - This notice will include the health plan name and premium for the upcoming year, and their APTC amount.
 - Those who were determined eligible but not enrolled and got a 2022 application will get a 2022 eligibility notice during this timeframe. It will not include any renewal information.
- **Open Enrollment begins on November 1st.** The Health Connector follows guidelines to place members into their dental and medical plans each year.
- For coverage effective January 1, 2022, payment is due on December 23, 2021.

Open Enrollment 2022 Talking Points for Certified Assisters



Medicare Reminders: Health Connector members who are **identified as Medicare eligible** in their 2022 application will lose access to State and Federal subsidies.

- They can remain in an unsubsidized Health Connector plan through the end of the calendar year.
- These individuals will not be renewed for the upcoming year (they will lose their Health Connector health plan at the end of the calendar year).
If they are enrolled in a Health Connector Dental plan, they will be eligible to stay enrolled in Dental for the next year.