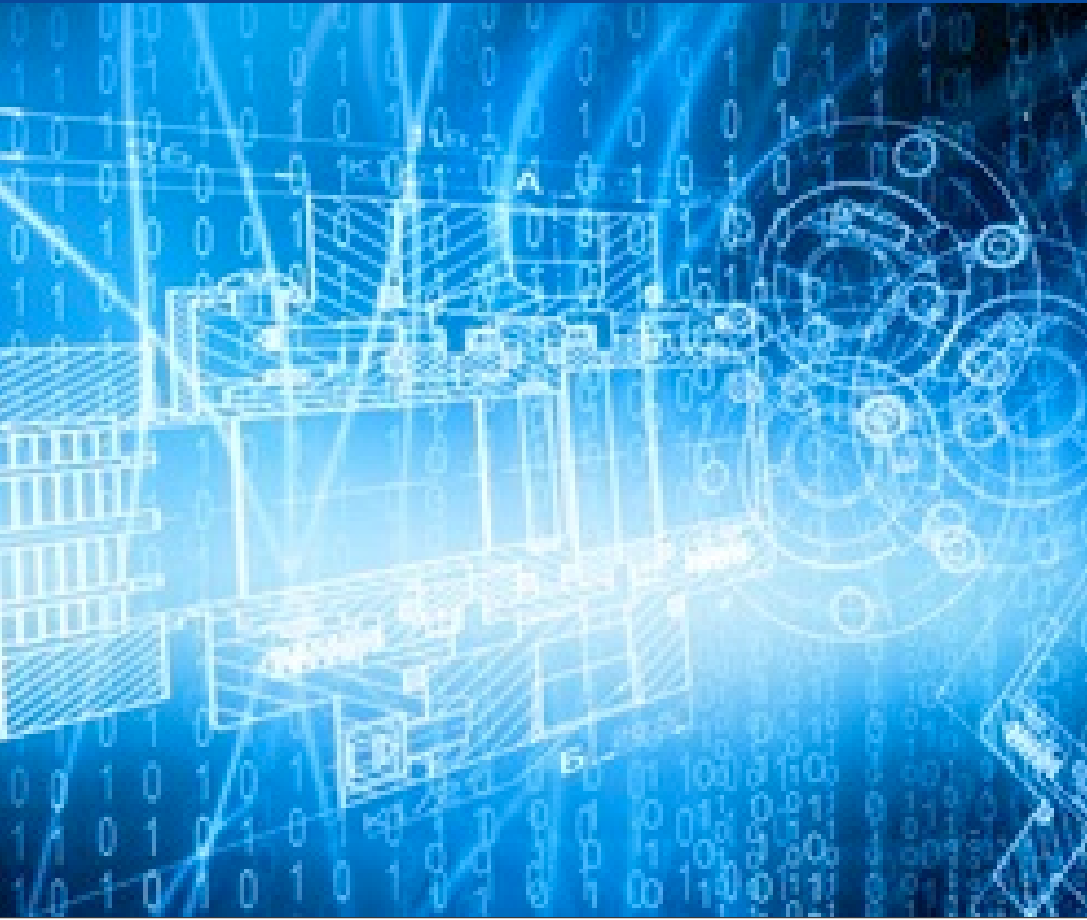




Periodic Data Matching (PDM)



Identifying and Notifying Consumers
Enrolled in Marketplace Coverage
with APTC or CSRs
and Medicaid or CHIP

October 2015

*Note: This presentation is geared toward assisters
(which includes Navigators, non-Navigator
personnel, agents, and brokers)*

Periodic Data Matching: Current Implementation Overview

- Periodic Data Matching (PDM) identifies consumers enrolled in Federally-facilitated Marketplace (Marketplace) coverage with advance payments of the premium tax credit (APTC) or cost-sharing reductions (CSRs) and minimum essential coverage (MEC)* Medicaid or CHIP (i.e., dually-enrolled)
- Why PDM is important for consumers
- What assisters should know, how they can help
- Resources

** Most Medicaid or CHIP is considered MEC; some forms of Medicaid or CHIP coverage (e.g., emergency or coverage for pregnancy-related services only) are not considered MEC.*

Periodic Data Matching: Background

Marketplaces must:

- Periodically examine available data sources to determine whether consumers who are enrolled in Marketplace coverage with APTC or CSRs have been determined eligible for Medicaid or CHIP (45 CFR 155.330(d))
- Notify these consumers, and if the consumer doesn't respond to the notice, end APTC/CSRs (45 CFR 155.330(e))

IMPORTANT: In 2015, the Marketplace will not take action to end consumers' APTC/CSRs as a result of Periodic Data Matching. Consumers will need to take action to end their Marketplace coverage with APTC/CSRs. If dually-enrolled consumers do not end their Marketplace coverage with APTC, the tax filer(s) will likely have to pay back all or some of the APTC received during the months the consumers are also eligible for Medicaid or CHIP (note: liability starts the first of the month following the Medicaid or CHIP eligibility determination).

Periodic Data Matching: Notifying Dually-Enrolled Consumers

CMS mailed paper notices* to the household contact for consumers who may be dually-enrolled, that included:

- Names of consumers who were found to be dually-enrolled;
- A warning that individuals who are eligible for Medicaid or CHIP are not eligible for financial assistance through the Marketplace, and about potential tax liability when a consumer is enrolled in Medicaid or CHIP and Marketplace coverage with APTC/CSRs;
- Instructions on how to end Marketplace coverage with APTC (for consumers enrolled in Medicaid or CHIP);
- A note that no action is needed at the Marketplace for consumers who aren't enrolled in Medicaid or CHIP; and
- Contact information for the state Medicaid or CHIP agency to confirm if enrolled or for any questions.

Not all dually-enrolled consumers in all states will receive notices because not all states were able to fully participate in this round of PDM for technical reasons. Consumers in the following states will not receive notices in this round of PDM: AK, DE, GA, ME, MI, NJ, OR, TN, SC, and WY.

** Only paper notices have been sent via mail. PDM notices will not be posted electronically to consumers' accounts.*

Periodic Data Matching: Sample Notice

9/18/2015

Application date: 3/1/2014

Application ID: 123456789

Dear J-Ohn:

You're getting this notice because some people in your household may be enrolled in both a Marketplace health plan and Medicaid or Children's Health Insurance Program (CHIP) and you may need to take action immediately to end Marketplace coverage with advance payments of the premium tax credit.

Consumers aren't eligible for a Marketplace plan with the premium tax credit if they were determined eligible for Medicaid or CHIP coverage that qualifies as minimum essential coverage. The Marketplace has information indicating that the following people are enrolled in a Marketplace plan with premium tax credits and Michigan Department of Community Health (Medicaid) or Michigan MICHild (CHIP):

- John Doe
- Jane Doe
- Mira Doe

If the people listed above are enrolled in Medicaid or CHIP benefits, they should immediately end their Marketplace coverage with premium tax credits. The tax filer(s) who claim these people as dependents on their income tax return will likely have to pay back all or some of the premium tax credits received for a Marketplace plan during the months the people listed above were also enrolled in Medicaid or CHIP.

Why Periodic Data Matching & Noticing is Important for Consumers

- Consumers determined eligible for MEC Medicaid or CHIP are not eligible for a Marketplace plan with APTC or CSRs and should end their Marketplace coverage with APTC/CSRs.*
- If consumers enrolled in MEC Medicaid or CHIP do not end their Marketplace coverage with APTC/CSRs, the tax filer(s) will likely have to pay back all or some of the APTC received for a Marketplace plan for the months following the consumers' eligibility determination for MEC Medicaid or CHIP when they file their tax return.

** Consumers enrolled in MEC Medicaid or CHIP who still want a Marketplace plan would have to pay the full price without a tax credit or cost-sharing reductions.*

What Assisters Should Know - How to Help

Consumers who receive the notice may contact assisters:

- For help understanding the notice
- For help ending Marketplace coverage with APTC/CSRs
 - See “Other Resources” slide for instructions on ending FFM coverage with APTC/CSRs.
- If they don't think they're enrolled in MEC Medicaid or CHIP
 - No further action is needed with the Marketplace, but consumers may opt to contact their state Medicaid or CHIP agency to confirm that they're not enrolled. Contact information for state Medicaid or CHIP agencies is available in the notice.

What Assisters Should Know - How to Help (continued)

- If they want more information about Medicaid or CHIP OR if they aren't sure if they're enrolled in or determined eligible for Medicaid or CHIP
 - Consumers may contact their state Medicaid or CHIP agency to confirm that they haven't been determined eligible for or are not enrolled in MEC Medicaid or CHIP. Contact information for state Medicaid or CHIP agencies is available in the notice.

No further action is needed with the Marketplace for consumers who have not been determined eligible for or are not enrolled in MEC Medicaid or CHIP.

- If they're enrolled in MEC Medicaid or CHIP but believe they are actually eligible to remain enrolled in Marketplace coverage with APTC/CSRs
 - Example: The consumer has experienced a family size or household income change that makes him or her ineligible for Medicaid/CHIP.

The consumer should contact his or her state Medicaid/CHIP agency to inform them of the change and receive a redetermination of eligibility for Medicaid/CHIP. If found no longer eligible for Medicaid/CHIP, his or her coverage will end. The consumer can remain in his or her Marketplace coverage with APTC/CSRs, if otherwise eligible.

Periodic Data Matching: Estimated Timeline

- **September 2015:** Notices sent to consumers who may be dually-enrolled, as identified through Periodic Data Matching
- **2016:** Additional Periodic Data Matching and notifying of consumers

** All dates subject to change*

Other Resources

- Process for Ending Coverage in a QHP through the Marketplace with APTC and CSRs: <https://marketplace.cms.gov/technical-assistance-resources/ending-coverage-in-a-qhp.pdf>
- HealthCare.gov instructions on ending Marketplace coverage when a consumer gets Medicaid or CHIP: <https://www.healthcare.gov/medicaid-chip/cancelling-marketplace-plan/>
- HealthCare.gov general instructions on ending Marketplace coverage: <https://www.healthcare.gov/keep-or-change-plan/cancel-plan/>
- Sample notices: <https://marketplace.cms.gov/applications-and-forms/notices.html>
- Periodic Data Matching in the Federally-facilitated Marketplaces (Marketplaces) FAQ: <https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/Downloads/Periodic-Data-Matching-FAQ-92815.pdf>