

Redeterminations and Reenrollment Procedures for Plan Year 2025

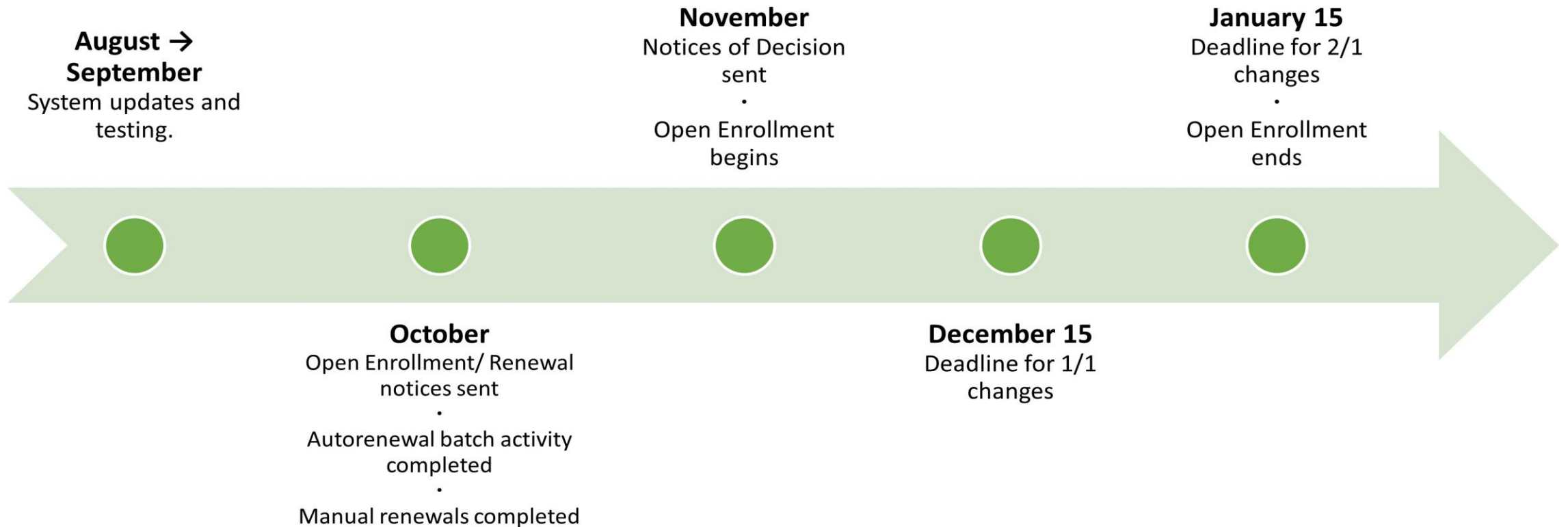
September 2024

- APTC: Advance premium tax credit
- CMS: Centers for Medicare and Medicaid Services
- DACA: Deferred Action for Childhood Arrivals
- EHB: Essential Health Benefits
- FPL: Federal Poverty Limit
- FTR: Failure to Reconcile
- GMCB: Green Mountain Care Board
- IRS: Internal Revenue Service
- QHP: Qualified Health Plan
- RRV: Renewal and Redetermination Verification Service
- SOV: State of Vermont
- VHC: Vermont Health Connect

- Annual Open Enrollment Period for 2025 QHP enrollment
- Open Enrollment runs November 1 – January 15
 - Dec 15 deadline for 1/1 changes
 - Jan 15 deadline for 2/1 changes

Timeline

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- DACA individuals will be able to apply for and enroll in QHP coverage with subsidies
- Silver loading/targeted gold mapping
- Processes that were not in effect during Medicaid renewal restart(“unwind”) will resume this year (FTR and verifications)

Significant changes to reenrollment:

- Certain enrollees in silver plans will be auto-enrolled to more generous, less expensive gold plans (see next slide on “targeted gold mapping”)
- Customers aging off a catastrophic plan will be auto-enrolled into a Bronze level plan
- New non-standard gold plan, MVP VT Plus Gold 4, to replace existing non-standard MVP VT Plus Gold 2 plan.

- Background
 - GMCB “silver loading” guidance makes silver premiums higher than gold premiums for 2025
 - Communications campaign to highlight increased buying power and encourage plan shopping
- Mapping criteria
 - More generous (higher AV) plan
 - Identical benefits (with lower cost-share)
 - Lower premium
- Mapping population
 - Enrolled in any silver 73 or silver 77 variant
 - Enrolled in base silver and APTC eligible <400% FPL

Targeted Gold Mapping

BCBSVT	
2024 Silver Plan (77% and 73% CSR, 300% -400% FPL)	2025 Mapped Gold Plan
Standard Silver Plan	Standard Gold Plan
Standard Silver CDHP Plan	Select Gold CDHP
Preferred Silver	Preferred Gold
Select Silver CDHP	Select Gold CDHP
MVP	
2024 Silver Plan (77% and 73% CSR, 300%-400% FPL)	2025 Mapped Gold Plan
Silver 3	Gold 1
Silver 4 HDHP	Plus Gold 3 HDHP
Plus Silver 1	Gold 1
Plus Silver 2 HDHP	Plus Gold 3 HDHP

- August: outreach to QHP enrollees to request updated information including tax authorization
- August-September: testing for autorenewal process (passive file) and eligibility system updates
- October: Autorenewal batch activity updates portal with projected eligibility and default plan selection
- October: Manual (eligibility staff) renewal for subpopulations including age-offs and missing data cases
- November 1: Open enrollment, Notices of decision
- December 15: Deadline for 1/1 changes

- Updates to FPL tables, applicable benchmark plan, EHB percentage, applicable percentage, required contribution
- Federal data services hub (“hub”) renewal and redetermination verification (RRV) service, including IRS
 - Vermont Department of Labor is secondary data source for income
- Autorenewal batch activity:
 - Projected eligibility
 - Verification statuses refreshed to inform outreach during plan year

2025 Income Thresholds

Vermont Household Income Thresholds for Cost Sharing Reductions (CSR), Vermont Premium Assistance (VPA), and Premium Tax Credits (PTC)										
Eligibility for 2025 Benefits Determined Based on 2024 Federal Poverty Level (FPL)										
Upper FPL% and <i>annual</i> income limits for:		Silver 94 (94% AV) CSR Tier I	Silver 87 (87% AV) CSR Tier II	Silver 77 ++ (77% AV) CSR Tier III	VPA & Silver 73 ++ (73% AV) CSR Tier IV	PTC - typical threshold	PTC - expanded through 2025 by Inflation Reduction Act			
Household Size**	100% (for reference)	150%	200%	250%	300%	400%	N/A	N/A	N/A	N/A
Coverage Tier		All	All	All	All	All	Single	Couple	Parent and Child(ren)	Family
1	\$15,060	\$22,590	\$30,120	\$37,650	\$45,180	\$60,240	\$180,216	N/A	N/A	N/A
2	\$20,440	\$30,660	\$40,880	\$51,100	\$61,320	\$81,760	\$180,216	\$360,432	\$347,816	N/A
3	\$25,820	\$38,730	\$51,640	\$64,550	\$77,460	\$103,280	\$180,216	\$360,432	\$347,816	\$506,407
4	\$31,200	\$46,800	\$62,400	\$78,000	\$93,600	\$124,800	\$180,216	\$360,432	\$347,816	\$506,407
5	\$36,580	\$54,870	\$73,160	\$91,450	\$109,740	\$146,320	\$180,216	\$360,432	\$347,816	\$506,407
6	\$41,960	\$62,940	\$83,920	\$104,900	\$125,880	\$167,840	\$180,216	\$360,432	\$347,816	\$506,407
7	\$47,340	\$71,010	\$94,680	\$118,350	\$142,020	\$189,360	\$185,107***	\$360,432	\$347,816	\$506,407
8	\$52,720	\$79,080	\$105,440	\$131,800	\$158,160	\$210,880	\$196,242***	\$360,432	\$347,816	\$506,407
For each additional person add	\$5,380	\$8,070	\$10,760	\$13,450	\$16,140	\$21,520	N/A			

**Household size = tax filer + spouse (even if they live apart) + tax filer's dependents. Married couples must file jointly to be eligible for APTC and CSR.
 ***At this income level, you will qualify for PTC if you enroll in a Couple, Parent and Child(ren), or Family plan, but not a Single plan.
 ++ Enrollment in these tiers is blocked. The exchange encourages customers to shop for other plans as there is better value in Gold level plans



- Testing for autorenewal process (passive file) allows for population refinement
- Manual renewal populations processed separately:
 - Age-offs
 - Cases with missing data
- Anticipate 99% autorenewal rate
- Default passive reenrollment critical to Vermont's high insured rate

- QHP rate review and certification complete by early September
- Issuer review of plan data loaded on exchange
- Default plan mapping through autorenewal process
- 1:1 plan crosswalk:
 - Equivalent 2025 QHP (default)
 - New MVP gold plan
 - Targeted Gold Mapping
 - Catastrophic age off to bronze plan designated by each issuer (manual)
- Transmission of batch reenrollment file to QHP issuers
- New QHP selection requires binder payment to issuer

Failure to Reconcile (FTR)

- FTR codes consumed by eligibility system triggering loss of APTC for upcoming plan year
 - IRS FTR code 011 indicates lack of reconciliation for 2 consecutive years
- Customer attestation of filing compliance overrides FTR on a prospective basis
- Outreach during plan year to enrollees with one year FTR indicator

Inconsistencies

- Inconsistencies for income and other eligibility factors addressed through outreach during the plan year

- August: “Zero Authorization” notice
 - Describes steps to provide updated authorization to obtain tax information for renewal
 - ~800
- September and during Open Enrollment
 - Planned targeted outreach using multiple modalities to encourage customers to report changes
- October: Open Enrollment/Renewal notice
 - Explains OE dates and deadlines
 - ~22,000
- November: Uninsured Vermonters notice
 - Sent to those who don’t have minimum essential coverage based on past year tax information and explains coverage options
 - ~25,000
- October: Issuer Renewal notices
 - Includes premiums, subsidies, and default plan selection for 2025
 - ~22,000
- November: Renewal Notice of Decision
 - Describes eligibility determination for upcoming plan year
 - ~22,000

- Plan Comparison Tool launches in October to allow for plan shopping
 - Will be updated consistent with targeted gold mapping
- Annual Assister training
 - 122 Assisters spread among Vermont's 14 counties
- Other:
 - Website updates, online stakeholder toolkit
 - Social media campaigns
 - Informational e-mails, texting to specific populations
 - Stakeholder newsletters
 - Public virtual town halls

- Integrated marketplace
- Vermont Health Connect serves approximately 5,000 mixed households (households containing both QHP and Medicaid enrollees)
- Medicaid members in mixed households will be renewed through a separate process and receive Medicaid specific renewal notices.

- The State's approach to annual redetermination meets federal standards for approval of an alternative procedure by:
 - Facilitating continued enrollment in coverage,
 - Providing clear information about the process to the qualified individual or enrollee (including regarding any action by the qualified individual or enrollee necessary to obtain the most accurate redetermination of eligibility), and
 - Providing adequate program integrity protections

45 CFR 155.335(a)(2)(iii)