



90-DAY VERIFICATIONS UPDATE FINANCE AND OPERATIONS COMMITTEE

March 27, 2017

Verifications Project - Background

- Various events may result in a system request that members provide documents to verify their eligibility for APTC or QHP:
 - New FA enrollment
 - Change to existing eligibility
 - Systematic update to all accounts (e.g., Cost of Living Adjustments (COLA))
- These customers are given a 90-day Reasonable Opportunity Period (ROP) to provide the documents (counted from the date of the new enrollment, change, or systematic update).
- After the 90-day period, the system sends a data “payload” from CBMS that removes the customer’s plan or APTC, depending on the type of verification required.
- With implementation of the FDSH project, these payloads resulted in losses of APTC/QHP for persons with failures to notify as far back as 2012.
- The Verifications project was created following the FDSH implementation to make sure loss of APTC/QHP only occurs when justified by the case.

Failure to Provide Verification - Implementation Plan

1. Proactive, manual clean up of historical cases to get close to a “clean start” for the 2017 plan year.
2. Prepare affected Operational departments to communicate and manage the process.
3. Communicate to channels and partners about what is going on, how customers may be impacted, and recourse available to them.
4. Start Business Process Phase In – Take required action following manual validation that the removal of APTC/QHP is warranted for small set of cases daily. End-to-End process check.
5. Once items 1-4 are completed to our satisfaction, restart full automated removals.

Customers Potentially at Risk of Losing APTC/QHP

Customers at risk of losing APTC are those who:

1. Had effectuated plans on the Financial Assistance path for the 2017 plan year.
2. Received the notice to provide verification documents, but failed to do so within the allowed 90-days and did not request an extension prior to 90 days.
3. Received all four notices provided to affected customers.
4. Are shown as having lost APTC/QHP in the customers PEAK account.

* C4HCO is developing a report of failed verifications for the period 2/5 to 3/11 to give us an idea of the volume to prepare for. The report will be filtered to exclude:

- Anyone who does not have a C4HCO account
- Anyone who did not have an effectuated QHP during the period.