



# BOARD ADVISORY GROUP

April 26, 2017

# VERIFICATIONS

# Background

- Various events may require a customer to provide documents to verify their eligibility for the Advance Premium Tax Credit (APTC) or Qualified Health Plan (QHP).
- 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).
- If the customer does not provide the requested verification within the 90-day ROP, their APTC or QHP is removed, depending on the type of verification required.

# Verifications - How Failure to Verify Can Affect Customers

## **Failure to Provide Income Verification Documents**

- Loss of eligibility for APTC/CSR is reflected in the month following expiration of the 90-day period.
- Loss of eligibility for APTC/CSR triggers a Special Enrollment Period which gives the customer 60 days to shop for a different plan without APTC/CSR. The new plan is effective on the first of the month following selection of a plan.
- If the customer does not shop for a different plan or cancel the plan, the customer's existing plan continues without APTC/CSR.

## **Failure to Provide Documents Related to Eligibility for QHP Enrollment**

- Termination of the customer's QHP is effective the month following expiration of the 90-day period.
- The customer is not allowed to shop for another plan unless the customer experiences a Qualifying Life Change Event (QLCE) that independently allows them to shop for a plan.
- Acquiring a new plan is conditioned on the customer providing the missing verification documents.

# CMS Guidance

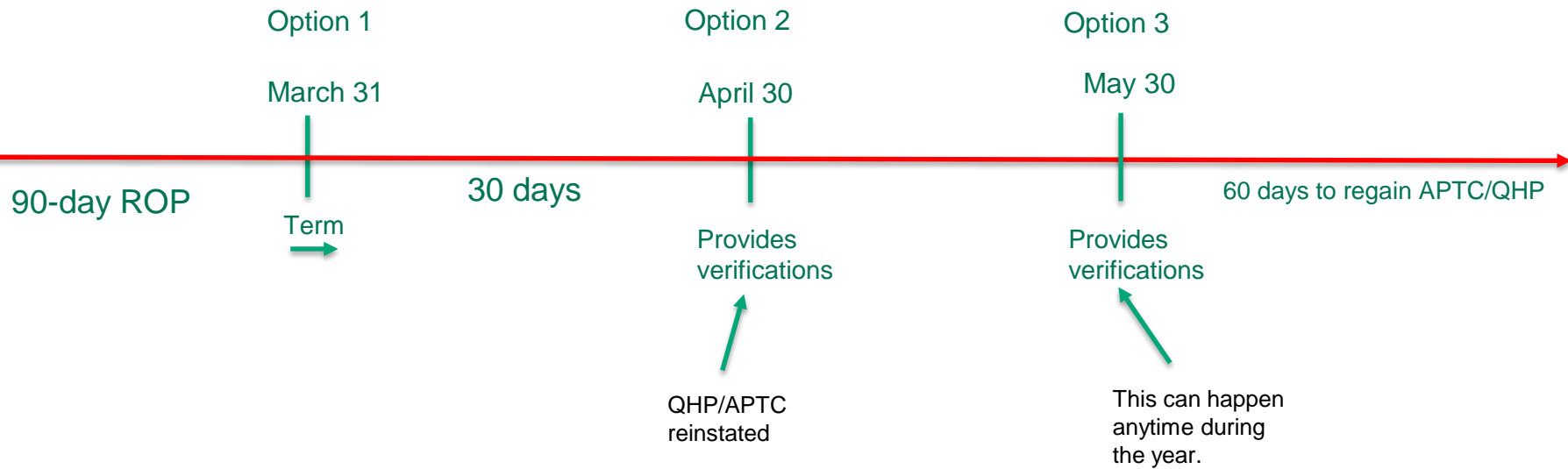
- Recent CMS regulation allows state exchanges the option of creating a Special Enrollment Period (SEP) for customers who lost APTC or coverage due to failure to provide verification of income, identity, or other items by the time of ROP expiration.
- Connect for Health Colorado is currently evaluating options for implementation.

# Options Considered

Connect for Health Colorado is considering the following options:

1. Do not implement the Optional SEP applicable following a customer's failure to provide documentation within the required 90 days.
2. Adopt the Optional SEP in the Federal rule providing customers the ability to trigger a 60-day period to regain APTC/CSR by submitting the required documents following loss of APTC/CSR.
3. Adopt a Reinstatement process that allows enrollees to provide documentation within the 30 days following loss of APTC/QHP in order to maintain their APTC/QHP without coverage gaps.

# Sample timeline for options



# DISCUSSION