



CSR SILVER-LOADING UPDATE

Board Advisory Group
July 25, 2018

DOI Bulletin (for PY2019)

- Moving from “Broad Load” to “Silver Switch”
- DOI finalized Bulletin No. B-4.100 on June 8, 2018
 - No changes from draft Bulletin
- Directs issuers to:
 1. Load the rate increase necessary to cover the cost of providing the CSR benefit onto Silver-level plans (this includes the off-exchange mirror of the on-exchange Silver level plan)
 2. Create a “substantially similar” Silver-level plan, without the CSR load, for those off-exchange consumers who do not qualify for advanced premium tax credits (APTC) or CSRs

Consumer Impacts

Subsidized Consumers

- Increase in APTC will protect them from premium increases
- Still have to purchase on-exchange Silver to get CSR reductions
- Should consider Gold or Bronze

Unsubsidized Consumers

- Could purchase other metal levels on-exchange to avoid CSR load
- Could purchase Silver off-exchange to avoid CSR load

New Consumers

- More consumers may qualify for APTC because Silver benchmark will be higher-priced

Recommended Strategies

- Discussing communication plans with issuers
- Targeted outreach to unsubsidized consumers who are enrolled in Silver level plans:
 - Suggest they look at Bronze or Gold
 - Or if they still want Silver, go off-exchange

Example:

If your suggested plan is a Silver plan, your premium increase may be significant this year. We strongly encourage you to consider other options such as switching to a Gold or Bronze plan. If you want to stay in a Silver plan, you may find lower-cost options if you purchase directly through your insurance company instead of through Connect for Health Colorado

- Stressing the importance of actively shopping
- Providing additional training and resources for brokers and assisters