



Options to Reduce Burden for Easy Enrollment Customers

Easy Enrollment Burden Reduction Opportunities

	Preliminary eligibility assessment with savings info sent to customers	Application pre-population	Full auto-enrollment
Summary	Tax information used to generate a potential savings figure for customer, which they receive as part of their noticing	C4HCO application pre-populated with data from tax form	Customer enrolled into coverage option based upon tax information
Operational Considerations	Requires building a new eligibility system to generate potential savings amounts; XL build	Create new accounts and link customer-specific information with account; XL build	Mechanisms for eligibility assessment, plan selection and enrollment; XL build
ROI	Additional enrollments resulting from savings info, minus cost of building new eligibility system	Additional enrollments resulting from pre-population, minus cost of pre-populating effort	Potential for new enrollments may outweigh costs of implementation
Pros	Provides additional savings information to customer	Saves customer time when completing an application	Uninsured rate reduction
Cons	Savings information will not be accurate, limited evidence that savings information will have large impact on customer enrollments	Limited information from DOR can be used to pre-populate application	Potential tax liability for customers, challenges communicating tax reconciliation requirements

Limited information for pre-population

- **Last Name**
- **First Name**
- **Middle Initial**
- **Phone Number**
- **Email Address**
- **Mailing Address**
- **City**
- **State**
- **Zip**
- **Year**
- Taxpayer Key
- Paper, ROL, E-file indicator
- Filed by the deadline indicator
- ***Adjusted Gross Income***
- **Household size**
- **Date of Birth**
- **SSN or ITIN**

Data necessary for Marketplace auto-enrollment

- All income information and deductions
- Citizenship or immigration status
- Tax filing information (filing status, marital status and tax relationships)
- Other insurance information (access to or enrollment in coverage for all members, including costs)
- Non-financial factors such as residential address, incarceration status, AI/AN status, smoker designation

Legal guardrails

- “Declarations and Signatures”
 - The Affordable Care Act requires recipients of APTC to agree to a series of attestations regarding their obligations as recipients of APTC.
- Receipt of APTC carries a tax reconciliation risk
 - For households with \$0 premiums, this could mean thousands of dollars in reconciliation liability. Recipients must be clearly informed of this risk, and of their obligation to timely report any changes.
- Consent
 - Consent should be clear, unambiguous, well-informed, and ideally an opt-in.
 - We need consent to use this information in an application for insurance affordability programs and need consent to match information in an application against federal data sources.

Experience in Maryland

- As part of their Easy Enrollment legislation, Maryland is conducting a feasibility assessment to determine ability to enroll customers into Medicaid
- Challenges included:
 - Lack of needed fields in tax filing forms
 - Concern with tax liability for APTC
 - Inability to gain signature from tax filer, a final step in enrollment process
 - Concerns about preparers being liable if they didn't ask clients to check the box.
- C4HCO will work with MD to identify implementation lift and enrollment impact of pre-population