

June 2023 Community Workgroup Q&A

Medical Assistance Unwinding Update

- Can you go over the process of how to enroll in retroactive coverage? I have clients who are having issues enrolling in retro coverage due to loss of MA.
 - Please refer to walkthroughs from previous Pennie Community Workgroup meetings in Feb, March, and April <https://agency.pennie.com/pennie-community-workgroup/>.

Upcoming System Enhancements (end of June 2023)

- Is there a certain way to disenroll a member that moves out of state?
 - The customer can disenroll through the online portal or they can call Pennie to disenroll.

New Data Matching Issue (DMI) Policies

- Will the Income Attestation Form be available as an option in the dropdown when selecting what documents to upload?
 - We are working on adding "Self-Attestation Form" to the document type drop-down menu. In the interim, you can use any other document type when uploading an Income Attestation Form.
- When I called the broker line yesterday, I was advised that my clients who missed the deadline for submitting their income documents would lose their coverage. My understanding was that the members would only lose their tax credit. The extended ROP is very confusing and two of my clients were not notified of the extension. Are there any options for these individuals to still submit their documents?
 - They should submit their income documents immediately. If documentation is not submitted promptly, they risk losing their financial assistance (APTC/CSR) at the end of the month.
- Can you revisit acceptable income documentation with the team that reviews DMIs? I include all anticipated income only to have it rejected by Pennie CSRs because it's not an "official document." For example, if it's April, but my client expects to collect Social Security in October, that SSI should be included in their expected income calculation even though they haven't received the official document yet.
 - In these cases, you can use the current attestation form by submitting any documents you have in addition to the attestation form, which should include an explanation that you are including SS income in the calculation.
 - Starting in July 2023 when the new Income Attestation policy is implemented, you will be able to submit the attestation form by itself to resolve the DMI even without the additional SS documentation.

- If someone lost their coverage earlier this month due to not submitting their proof of income, can they request to reinstate their coverage and then submit their proof of income? I had a few people that lost or will lose their coverage because they did not submit proof of income earlier this month.
 - You should submit documentation right away. If the due date for the Income DMI just passed, they may still have time to provide documentation before the adverse action occurs (i.e. the loss of financial assistance).

How to Calculate Income

- Is the Adjusted Gross Income the final income number on the tax return?
 - There is a line on a customer tax return for AGI. We recommend talking to a tax professional for questions regarding tax returns.
- Is private, long-term disability income counted as income? This is not an employer-provided benefit. A client of mine was told by their accountant this income is not taxable.
 - If it is not considered taxable income, then you would not include it as income on the application.
- The gross Social Security income amount is entered on line 6A of the income tax form. However, only a certain, much smaller portion of this is taxed and counted on line 6B, which contributes to the AGI. On the Pennie application, what amount of SS income should be included: the gross amount or the taxable amount?
 - You would use the AGI number. Please refer to [Pennie FAQ: What to include as income](#) for more information, including clarity on the different types of social security-related income and whether to include or not include it.

Privacy & Security

- Does Pennie provide an alert that your password needs to be changed within the next [X] days? I have been surprised when I start an application with a client that suddenly I have to change my password when I didn't realize that was coming up.
 - Thanks for the suggestion. We can look into that as a potential future enhancement.

Changes in Circumstances: Impact to Premium Tax Credits & Advance Premium Tax Credits

- Can a person have their financial assistance retroactively applied for June 2023 if they call Pennie on July 1st?
 - Eligibility determinations are prospective only. An application submitted between 7/1-7/31 will result in eligibility effective 8/1.

- I've had some instances where a change of income has resulted in the client not being able to afford their plan anymore. If their income goes up dramatically, will they have an option to shop for a lower cost plan again?
 - Customers can shop for a health plan outside of Open Enrollment only when they qualify for a Special Enrollment Period. There are some SEPs that are triggered by changes in eligibility, but those are only when someone is "Newly Eligible For APTC/CSR" or "Newly Ineligible for APTC/CSR." If the only change is the amount of APTC (regardless of whether the amount of APTC goes up or down), that does not qualify for an SEP. Please see Pennie's SEP Quick Reference Guide on the [Resources page](#) for more information.

- Is there the potential of a tax penalty for underestimation of household income?
 - Yes, if you underestimate household income, the customer will have received more APTC than the PTC they will be eligible for at tax time, which means the customer will have to pay back some or all of the excess APTC they received during the year. That is why it's so important to estimate household income as accurately as possible, and to update household income whenever there is a change.
 - Instructions on reconciliation of APTC & PTC are available on the IRS tax forms or you can refer to [IRS Publication 974](#) for more information.

- Can we adjust a customer's subsidy so they are paying more instead of changing their income? They will know that they might owe money at tax time, but they will be able to stay within their budget and still retain health insurance. I have people dropping their insurance when they have a dramatic increase.
 - Customers should always update their income on their Pennie application to ensure that they are receiving the right eligibility for APTC, CSR, or Medicaid/CHIP. Just reducing the amount of APTC that the consumer is taking still risks that the customer is receiving too much APTC or receiving CSR benefits they are no longer eligible for.
 - Customers do not need to use the full amount of APTC they are determined eligible for. They can either increase the estimated income on their application, or they can use the APTC Slider to apply only a portion of the maximum APTC they are eligible for to their enrollment. If a customer receives *less* APTC than PTC they are eligible for, they will always receive the remaining PTC on their tax return. This can be a helpful tool for customers with a high level of uncertainty about their projected income.

Miscellaneous

- Two questions: 1) Is there a way to add an option for brokers to deselect a beneficiary as the servicing broker of record? 2) Is there a way to identify if a beneficiary who may contact a broker/myself asking for help when they should be contacting the current broker of record that is on file?
 - Brokers can end the relationship with a customer, just like the customer can end the relationship with the customer. You can "de-designate" yourself from a customer through your broker portal.

- Whenever a broker designation changes, the customer receives a notice indicating who initiated the change.
- CMS covered some new rules regarding documentation of consent for marketplace applications and enrollments during the CMS Summit for Agents and Brokers on 5/24. These changes and new requirements are to go into effect on 6/18 and build upon the existing rules from 2022. This has been communicated for the FFM. Is there any guidance on how (if at all) this will affect us in PA? Any guidance from Pennie for brokers and assisters?
 - The recent changes CMS issued about requirements for brokers participating on HealthCare.gov do not automatically apply to brokers participating on state-based marketplaces like Pennie. Pennie will notify you if there are changes to requirements for Pennie-certified brokers.