

February 2024 Community Workgroup Q&A

Open Enrollment Period Update

- We have clients who are on Pennie and Medical Assistance (MA). Does the Pennie system catch that they are enrolled in MA and terminate their Pennie plan?
 - Brokers and Assisters should confirm with all clients that they are not enrolled in other coverage prior to enrolling them through Pennie. If you come across a client in this scenario, please help them terminate their Pennie coverage for any household member eligible for MA or other Minimum Essential Coverage (MEC). We rely on our Broker and Assister partners to ask these types of fact-finding questions when working with a new client to ensure someone does not have duplicative coverage.
 - Pennie periodically performs checks of all current Pennie enrollees to see if they are also enrolled in other coverage, including Medicaid/CHIP, through the Periodic Data Matching (PDM) process. If we find a customer we believe may be enrolled in Medicaid and Pennie coverage, we will send a letter notifying the customer and requesting that they contact us if they do not actually have other coverage. If they do nothing, their Pennie coverage will be terminated prospectively.
 - Reminder: Pennie can retroactively terminate Pennie coverage for customers who enroll in Medicaid as long as they make a timely request from when they were found eligible for Medicaid. Contact Pennie Customer Service for these requests.
 - There are time lags in certain instances, including scenarios where there is a pending appeal regarding Medicaid/CHIP coverage.
- After I update a customer's income and the system determines they are potentially MA-eligible, their subsidies are removed and they have to pay full premium. If they don't pay, their coverage will be terminated. Why are subsidies removed?
 - Pennie assesses each applicant applying for financial assistance for MA/CHIP eligibility before determining APTC/CSR eligibility. If their income falls within a certain threshold, they will be sent to DHS for a determination. During that time, individuals do not receive APTC or CSR.
- What should Assisters do if a customer never received a paper denial letter from the Department of Human Services regarding their MA coverage, but were told verbally they have been denied?
 - We would recommend that the Assister connect with the local County Assistance Office to try to gain either a paper or electronic confirmation.

Dental Plan Shopping

- Are brokers paid commissions for selling dental plans on Pennie?
 - Nearly all dental insurers on the Exchange offer commissions for selling their dental plans. The broker would first need to be appointed by the dental insurer in order to be eligible for those payments. Medical and Dental commissions information can be found here: <https://agency.Pennie.com/wp-content/uploads/2023/11/2024-Producer-Commissions-FINAL-10.26.23.pdf>

- When dental plans have waiting periods and/or tiering for benefits, can Pennie add information to the Plan Shopping page so we are more easily able to identify those?
 - Pennie can consider this for a potential future enhancement.
- Why are dental plans that do not include Basic or Major services available through Pennie?
 - Pediatric dental coverage is an Essential Health Benefit (EHB) and must be covered in full. Adult dental coverage is not an EHB and therefore can be covered at different levels. This is also why adult dental coverage may have an annual benefit dollar limit where pediatric does not.
- Is leftover APTC applied to the dental plan automatically, or do we have to do that manually?
 - If a customer has APTC leftover after picking a medical plan, the remaining APTC is automatically applied to any standalone dental plan selected. However, APTC is only available for *pediatric* dental coverage, meaning children under age 19. Leftover APTC cannot be used for adult dental coverage.

Immigration

- Is there a plan to offer DACA recipients healthcare through Pennie in the future?
 - Based on current federal law, DACA recipients are not considered lawfully present and therefore are not eligible for coverage through Pennie.
- If an immigrant is lawfully present and has a Visa, they wouldn't have an SSN. How can they file the tax return required in order to enroll and obtain APTC?
 - Many lawfully present individuals that do not have an SSN may still be eligible for coverage through Pennie. The lack of an SSN does not automatically mean a customer is ineligible for coverage through Pennie.
 - Individuals without an SSN may request an Individual Tax Identification Number (ITIN) from IRS for purposes of filing their tax return. Customers should not enter their ITIN in the SSN field on the Pennie application.
- How would an undocumented immigrant be able to get coverage?
 - Anyone who is undocumented can explore off-Exchange health insurance options .
- If an immigrant is here lawfully but not working yet, should we advise them to go directly to their County Assistance Office instead of applying through Pennie?
 - Lawfully present immigrants can still be eligible for coverage through Pennie. Additional information can be found here: <https://help.pennie.com/hc/en-us/articles/9346893936407-Coverage-for-lawfully-present-immigrants>

Income-related Data Matching Inconsistencies

- There is confusion about whether the Income Self-Attestation Form can be submitted as the first document to verify income. Can you clarify?
 - The income Self-Attestation Form can be accepted as the first form of documentation.
- Is there any leeway when providing income estimates? Most people are taking an educated guess as to what their incomes will be and may be off by a bit.
 - We do allow some flexibility if the income documentation does not match the income reported on the application exactly. For customers with fluctuating incomes, they are able to include an Income Self-Attestation Form along with their supporting income

- documentation to explain why the amount of income being reported is different from what is on the accompanying documentation.
- Some other tips for consumers with fluctuating income:
 - Ensure they update the income on their application throughout the year if they realize the original estimate is going to be different than their final annual income.
 - Consider taking less APTC per month. On the final enrollment page, customers can adjust the amount of APTC they receive each month. If their income is the same or less than expected, they will receive more premium tax credits at tax time. If their income is higher than expected, they may owe less or none of their APTC back at tax time.
 - Having a different income on the application than what is reported at tax time may result in the customer needing to pay back some or all of the APTC they received. It is important that customers take the steps above to prevent that from happening.