

# Proposed Affordability Schedule for Calendar Year 2018 (VOTE)

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### **Today's Focus**



- Background on the affordability schedule
- Analysis of specific proposed approach to 2018 affordability schedule
  - For 2018, we propose minimal changes to the affordability standards
    - For individuals up to 400% of the Federal Poverty Level (FPL), we propose to update the federal poverty standards with only minor technical modifications to the affordability standards associated with some income brackets
    - For individuals over 400% FPL, we propose a small decrease in the affordability standard to maintain parity with the affordability standard used by the federal individual mandate
- Staff recommendation to be discussed:
  - That the Board vote to issue for public comment the draft 2018 affordability schedules for individuals, couples and families

### **Background**



# Massachusetts law includes an "individual mandate" that requires adults to enroll in health insurance or face potential financial penalties.

- The individual mandate involves three key policy elements, set in statute or determined by the Health Connector, with the Department of Revenue (DOR) managing administration of the mandate through the tax filing process
- Penalties arise if an individual forgoes enrollment in an available plan meeting both Minimum Creditable
   Coverage (MCC) and affordability standards
- The Health Connector sets affordability and coverage standards and manages appeals (the penalty formula is set in statute);
- The Affordable Care Act (ACA) includes an individual mandate that relies on similar principles but differs in its details
- The state and federal mandates exist independently of each other



# The Affordability Schedule in Context



# The affordability schedule determines whether an individual must pay a penalty for not having Minimum Creditable Coverage (MCC).

 Supports consumers as they make choices about coverage and their household budgets by defining the maximum amount they would be expected to contribute toward coverage or face a penalty

# It is independent of other aspects of state and federal health care reform, but it is an important component of the coverage landscape.

- Does not require employers, issuers or other coverage providers to offer plans deemed affordable by the schedule or subject them to penalties if individuals fail to enroll in the affordable coverage they offered
- The Health Connector has historically aligned base enrollee premiums for subsidized individuals up to 300% FPL with the state's affordability schedule, such that the ConnectorCare program is considered affordable, but it is not required to do so under the law
- Does not affect the assessment of a federal penalty for failing to enroll in coverage

# **Application of the State Affordability Schedule**



The affordability schedule is most relevant for the relatively small portion of Massachusetts residents who are without MCC and therefore potentially subject to a state penalty.

- Those who are completely uninsured
  - The most recent Center for Health Information and Analysis (CHIA) Health Insurance
     Survey estimates ~97% of Massachusetts residents have health insurance
- Those with coverage that does not meet MCC standards
  - In Tax Year 2015, 93% of tax filers completing a Schedule HC reported having MCC for the entire year

#### 2018 Schedule: Context



## The affordability schedule has undergone a series of modifications over the last five years in response to changes accompanying the ACA

- Capped schedule at 8% federal standard
- Recalibrated standards between 300 and 400% FPL to be above ConnectorCare standards but below 8%

- Updated standards for up to 300%
   FPL based on last Commonwealth
   Care premium updates
- Technical modifications to other income brackets to preserve schedule trend

 2013
 2014
 2015
 2016
 2017

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- Introduced a 10% cap at highest income level
- Began lowering standards toward 8% federal standard

- Shifted to percentage-based standards instead of fixeddollar standards
- Considered policy adjustments to incorporate cost-sharing requirements and automatic indexing methodologies (ultimately not adopted)

### 2018 Schedule: Proposed Approach



To maintain the goals of the affordability schedule, including simplicity and progressivity, we recommend stability in the 2018 schedule without modification to the core approach.

- Apply the 2017 affordability standards to updated FPL standards
  - Results in \$1 increase to dollar-based premium amounts considered affordable for the 150-250% FPL range and \$2 increase for 250-350% FPL bracket, which we would recommend to carry over to ConnectorCare premium schedule
- Make minor technical adjustments to the affordability standards as needed to preserve affordability of ConnectorCare plans across family sizes as well as to maintain progressivity through the schedule
  - Increases were .05% of income and produced minimal change in the dollar amount of a premium considered affordable for a given household
- Slightly decrease the affordability standard for households over 400% FPL from 8.16% to 8.05% to match the 2018 federal affordability standard

#### **2018 Schedule Modifications**



	2017 Schedule: INDIVIDUALS								
Income Bracket				Monthly Dollar Amous					
% of FPL	Bottom	Тор	Affordability Standard	В	ottom		Тор		
0 - 100%	\$0	\$11,880	0%		7/1				
100.1 - 150%	\$11,881	\$17,820	0%			<u> </u>			
150.1 - 200%	\$17,821	\$23,760	2.90%	\$	43	s	57		
200.1 - 250%	\$23,761	\$29,700	4.20%	S	83	S	104		
250.1 - 300%	\$29,701	\$35,640	5.00%	S	124	\$	149		
300.1 - 350%	\$35,641	\$41,580	7.40%	\$	220	\$	256		
350.1 - 400%	\$41,581	\$47,520	7.60%	\$	263	s	301		
Above 400%	\$47,521		8.16%	\$	323				

2017 Schedule: COUPLES									
Income Bracket				Monthly Dollar Amount					
% of FPL	Bottom	Тор	Affordability Standard	Во	ottom		Тор		
0 - 100%	\$0	\$16,020	0%						
100.1 - 150%	\$16,021	\$24,030	0%						
150.1 - 200%	\$24,031	\$32,040	4.30%	\$	86	\$	115		
200.1 - 250%	\$32,041	\$40,050	6.20%	\$	166	\$	207		
250.1 - 300%	\$40,051	\$48,060	7.40%	\$	247	S	296		
300.1 - 350%	\$48,061	\$56,070	7.40%	S	296	\$	346		
350.1 - 400%	\$56,071	\$64,080	7.60%	\$	355	\$	406		
Above 400%	\$64,081		8.16%	\$	436				

2017 Schedule: FAMILIES								
Income Bracket				Monthly Dollar Amount				
% of FPL	Bottom	Тор	Affordability Standard	Во	ottom		Тор	
0 - 100%	\$0	\$20,160	0%					
100.1 - 150%	\$20,161	\$30,240	0%					
150.1 - 200%	\$30,241	\$40,320	3.45%	\$	87	\$	116	
200.1 - 250%	\$40,321	\$50,400	4.90%	\$	165	\$	206	
250.1 - 300%	\$50,401	\$60,480	5.90%	\$	248	\$	297	
300.1 - 350%	\$60,481	\$70,560	7.40%	\$	373	\$	435	
350.1 - 400%	\$70,561	\$80,640	7.60%	\$	447	\$	511	
Above 400%	\$80,641		8.16%	\$	548			

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Income Bracket			A # set o	Monthly Dollar Amount				
% of FPL	Bottom	Тор	Affordab <sub>lin.</sub> Standard	1	n_		Тор	
0 - 100%	\$0	\$12,060	0%					
100.1 - 150%	\$12,061	\$18,090	0%					
150.1 - 200%	\$18,091	\$24,120	2.90%	\$	44	\$	58	
200.1 - 250%	\$24,121	\$30,150	4.20%	S	84	S	106	
250.1 - 300%	\$30,151	\$36,180	5.00%	S	126	\$	151	
300.1 - 350%	\$36,181	\$42,210	7.45%	\$	225	\$	262	
350.1 - 400%	\$42,211	\$48,240	7.60%	s	267	s	306	
Above 400%	\$48,241		8.05%	\$	324			

2018 Proposal: COUPLES									
Income Bracket				Monthly Dollar Amount					
% of FPL	Bottom	Тор	Affordability Standard	В	ottom		Тор		
0 - 100%	\$0	\$16,240	0%						
100.1 - 150%	\$16,241	\$24,360	0%						
150.1 - 200%	\$24,361	\$32,480	4.35%	\$	88	\$	118		
200.1 - 250%	\$32,481	\$40,600	6.25%	\$	169	\$	211		
250.1 - 300%	\$40,601	\$48,720	7.45%	\$	252	\$	302		
300.1 - 350%	\$48,721	\$56,840	7.45%	\$	302	S	353		
350.1 - 400%	\$56,841	\$64,960	7.60%	\$	360	\$	411		
Above 400%	\$64.961		8.05%	\$	436				

	2018 Proposal: FAMILIES								
Inc	Income Bracket			Monthly Dollar Amount					
% of FPL	Bottom	Тор	Affordability Standard	В	ottom		Тор		
0 - 100%	\$0	\$20,420	0%						
100.1 - 150%	\$20,421	\$30,630	0%						
150.1 - 200%	\$30,631	\$40,840	3.45%	\$	88	\$	117		
200.1 - 250%	\$40,841	\$51,050	4.95%	\$	168	\$	211		
250.1 - 300%	\$51,051	\$61,260	5.95%	\$	253	\$	304		
300.1 - 350%	\$61,261	\$71,470	7.45%	\$	380	\$	444		
350.1 - 400%	\$71,471	\$81,680	7.60%	\$	453	\$	517		
Above 400%	\$81,681		8.05%	\$	548				

- Updated FPL standards shown in green
- Resulting changes to ConnectorCare base enrollee premiums shown in yellow
- Affordability standards that were modified shown in orange

### **Next Steps**



- Request Board vote to approve proposed CY 2018 Affordability Schedules for public comment
- At an upcoming Board meeting, summarize public comments and revisit vote on final CY 2018 Affordability Schedules

# 2018 Proposed Schedule: Individuals



#### **CY 2018 Affordability Schedule: INDIVIDUALS**

Income Bracket				Monthly Dollar Amount		
% of FPL	Bottom	Тор	Monthly Affordability Standard	Bottom	Тор	
0 - 150%	\$0	\$18,090	0%			
150.1 - 200%	\$18,091	\$24,120	2.90%	\$44	\$58	
200.1 - 250%	\$24,121	\$30,150	4.20%	\$84	\$106	
250.1 - 300%	\$30,151	\$36,180	5.00%	\$126	\$151	
300.1 - 350%	\$36,181	\$42,210	7.45%	\$225	\$262	
350.1 - 400%	\$42,211	\$48,240	7.60%	\$267	\$306	
Above 400%	\$48,241		8.05%	\$324		

## 2018 Proposed Schedule: Couples



#### **CY 2018 Affordability Schedule: COUPLES**

	Income Bracket			Monthly Dollar Amount		
% of FPL	Bottom	Тор	Monthly Affordability Standard	Bottom	Тор	
0 - 150%	\$0	\$24,360	0%			
150.1 - 200%	\$24,361	\$32,480	4.35%	\$88	\$118	
200.1 - 250%	\$32,481	\$40,600	6.25%	\$169	\$211	
250.1 - 300%	\$40,601	\$48,720	7.45%	\$252	\$302	
300.1 - 350%	\$48,721	\$56,840	7.45%	\$302	\$353	
350.1 - 400%	\$56,841	\$64,960	7.60%	\$360	\$411	
Above 400%	\$64,961		8.05%	\$436		

## 2018 Proposed Schedule: Families



#### **CY 2018 Affordability Schedule: FAMILIES**

	Income Bracket			Monthly Dollar Amount		
% of FPL	Bottom	Тор	Monthly Affordability Standard	Bottom	Тор	
0 - 150%	\$0	\$30,630	0%			
150.1 - 200%	\$30,631	\$40,840	3.45%	\$88	\$117	
200.1 - 250%	\$40,841	\$51,050	4.95%	\$168	\$211	
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Above 400%	\$81,681		8.05%	\$548		





Move that the Board approve the issuance for public comment of the Draft Affordability Schedules for Individuals, Couples and Families for Calendar Year 2018, as set forth in the staff proposal.

# **Appendix: CY2017 Affordability Schedule**

#### 2017 Schedule: Individuals



#### **CY 2017 Affordability Schedule: INDIVIDUALS**

	Income Bracket			Monthly Dollar Amount		
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## 2017 Schedule: Couples



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#### 2017 Schedule: Families



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