

Open Enrollment 2022 Readiness

MARISSA WOLTMANN
Senior Director of Policy and Applied Research

Board of Directors Meeting, October 14, 2021

Open Enrollment 2022

The Health Connector is ready to support members and applicants during Open Enrollment for 2022 plans, which begins November 1, 2021 and ends January 23, 2022.

- Open Enrollment (OE) is the time of year when Massachusetts residents can enroll in or change health or dental plans for any reason
- Today's presentation will outline the redetermination and renewal process and the special considerations of note for this Open Enrollment period:
 - Higher than usual movement to unsubsidized coverage
 - Ongoing enhanced subsidies under the American Rescue Plan (ARP) as well as phase out of the ARP's benefits for unemployment recipients
 - Outreach and education during the second OE of the pandemic
 - Potential end of the federal Public Health Emergency and subsequent transition of many individuals out of Medicaid coverage



Open Enrollment 2022 Timeline

Open Enrollment activities began in August and have been progressing according to schedule.



August-October

Members review preliminary notices and update accounts



November

Carriers receive 2022 enrollment transactions and shopping begins



August-September

HIX generates
preliminary 2022
eligibility
determinations, and
members receive
notification of this
projection and
instructions on next
steps



October

HIX uses latest 2022 application to calculate subsidies and renewal plans, and members receive eligibility and renewal notices



December

Premiums for January 1 coverage are due by December 23



Timelines and Hours

Open enrollment will run from November 1, 2021 to January 23, 2022 for non-group coverage on- and off-Exchange.

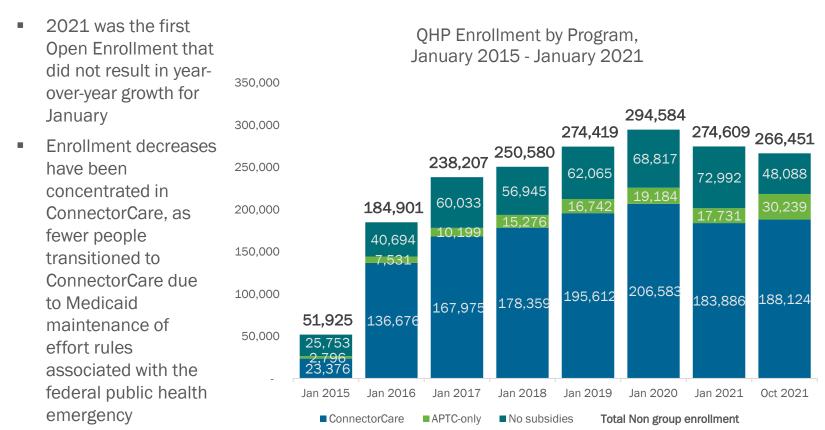
- The Division of Insurance will be issuing a bulletin to indicate that Open Enrollment for non-group plans offered directly by carriers will follow the same timeline as the Health Connector's Open Enrollment
- 2022 Open Enrollment Contact Center hours will include extended weekday hours and weekend hours on peak days surrounding December and January deadlines

Contact Center Hours of Operation	Open Enrollment 2022	Closed Enrollment
Monday – Friday	8 AM - 6 PM	8 AM - 6 PM
Extended Weekday Hours	8 AM - 8 PM Dec. 22, Dec. 23, Jan 20, & Jan. 21	N/A
Special Weekend Hours	10 AM - 4 PM Dec. 18, Jan 22, & Jan. 23	N/A



High Level Expectations

Medicaid protections and shifting labor market dynamics have reduced Health Connector enrollment and may put downward pressure on new member numbers during Open Enrollment.





Special Considerations for OE2022

Subsidy Loss for 2022

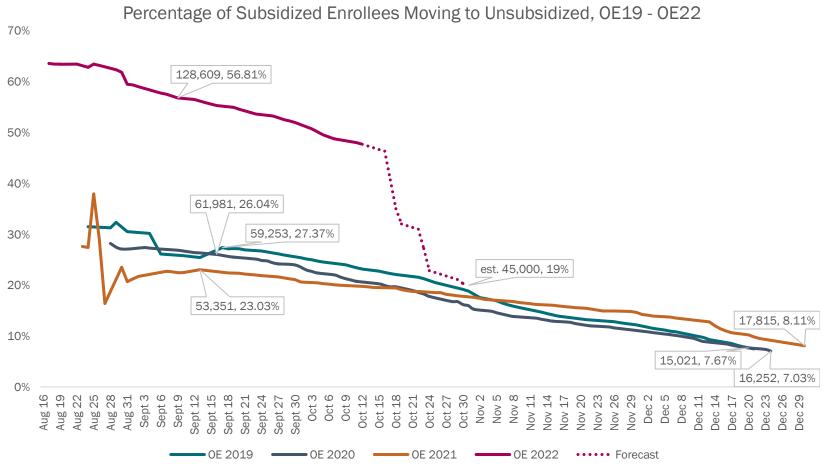
A higher number of amended 2020 tax returns has resulted in the Health Connector not receiving necessary data to verify members' attested income amounts.

- The American Rescue Plan's provisions to exclude the first \$10,200 of unemployment income from taxable income and to forgive excess APTC received resulted in IRS automatically amending many 2020 tax returns
- IRS returns a different set of income data to the Health Connector in the event of an amended return, which technical guidance directed the Health Connector to treat as "null" income data
- Unable to electronically verify income for many members, as of 10/12, approximately 48 percent of members currently receiving subsidies were projected to move to unsubsidized coverage, much higher than the roughly 20 percent at this time in prior years
- Communications will encourage and support members in making updates to the income section of their application, which will restore subsidies as appropriate
- Additionally, the Health Connector has recently received approval from CMS to use the income data received to verify subsidy eligibility through a workaround that will be executed as part of the process to "finalize" 2022 eligibilities in October, which will restore subsidy eligibility for as many as roughly 50,000 enrollees



Subsidy Loss for 2022, cont'd

As the Health Connector is able to verify individuals' income with alternate IRS data later this month, the rate of subsidy loss will begin to reduce to more typical levels by the start of OE.





Data as of 10/12.

8

Planned Activity to Mitigate Risk of Subsidy Loss

September	October	November	December
1-15 th : Prelim notices hit mailboxes	10/3-11/7: Final Eligibili	ty	1 st : January bill run
Mid-late Sept: Memb call or update applications; RFIs	pers Mid-Oct - sys	tem process to verify income with	AGI where possible Dec 8-10 th : robo calls
generated	10/11-11/15: Fina renewal notices hit		Mid-Dec: Members call or update applications; RFIs
	Mid-Oct- mid-l update applic generated	Nov: Members call or ations; RFIs	generated
	11-12 th : email to the subsidies	nose losing 10-12 th : robo ca	Ils 27 th : email to those losing subsidies
Late Se to those subsidie	e losing to thos	aper mailer (in 18h: email to the se losing losing losing subsidies)	
			due; last day to update eligibility for 1/1



American Rescue Plan Impacts

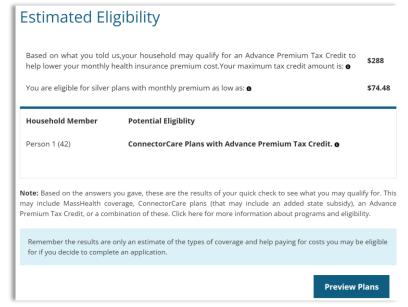
ARP subsidy enhancements continue to make coverage more affordable than ever in 2022.

- Some individuals may have chosen not to switch to the Health Connector mid-year but will at renewal
- The "Get an Estimate" tool quickly shows monthly premium estimates that reflect subsidy amounts, hopefully dispelling perceived affordability barriers

Those receiving rich benefits based on unemployment income in 2021 may see higher costs in 2022.

- Although subsidies for UI recipients may be extended, 2021 recipients will not qualify for extended tax credit enhancements unless they continue to collect in 2022
- Impacted members will receive special communications explaining the expiration of these benefits
- Staff will closely track member movement and shopping activity among this population and will report back to the Board

Sample 2021 results from www.MAhealthconnector.org/get-an-estimate





Outreach and Education

Open Enrollment 2022 activities will be fueled by a return to community-based, in-person events.

- Priority populations include the chronically uninsured, and those newly eligible for ARP subsidy
- Activities start this week, with a mix of opportunities in communities across the state
 - Community-based events promoting Open Enrollment and available Navigator assistance
 - Participation in public events, consistent with public health precautions
 - Creation of Health Connector-sponsored events
 - Signage in up to 2,000 businesses
 - Social media content-driven visits to Navigators and other community groups



Outreach and Education

Messaging will rely on multiple platforms, with two main target populations.

- Messaging focuses on the state's uninsured, and people who are newly-eligible for premium support due to expanded ARP subsidy
 - Encourage a first, or second, look at "better than ever" subsidy
 - Reinforce need for coverage during a pandemic
 - Feature Navigators as effective and available assisters
 - Build community support through #coveredtogether
- Video, digital, radio and print outlets will all be used for messaging
 - Ethnic media remains a key partner, including radio and TV programming that features call-in information requests
 - Visibility opportunities at club nights, holiday events, concerts and other community engagements



Outreach and Education, Navigators

The Health Connector's Navigator network includes 19 agencies, with 128 people providing assistance in 35 locations across the state.

- New for this Open Enrollment is a new organization, the Lowell Community Health Center
- Navigators provide assistance in 22 languages, with 16 organizations providing assistance in Spanish
- Navigator training and recertification is ongoing. Organizations must have Navigators recertified by October 31, but with many already certified they are ready to support new and existing clients



Potential End of the Public Health Emergency

The Health Connector is closely monitoring developments around the ongoing federal Public Health Emergency (PHE).

- Currently, about 480,000 individuals are being maintained in Medicaid benefits based on requirements in the Families First Coronavirus Relief Act, including over 200,000 individuals who have a QHP eligibility "underneath" their protected MassHealth benefit
 - This is not to say staff expect 200,000 enrollments next year, as the circumstances of protected individuals vary widely, and some may no longer need coverage or may continue to qualify for MassHealth
- While a PHE end date has not been announced, the Health Connector and MassHealth are working to align enrollment assumptions, operational activities, and communications to best serve the varying and complex needs of members
 - Staff will also coordinate on the use of AGI data by Medicaid programs and its impact on eligibility determinations; additional guidance from CMS on this front is expected
- Once the PHE ends, CMS guidance requires that Medicaid agencies conduct a complete renewal process before releasing protections and provides 12 months for agencies to do so
- Additional guidance from CMS regarding both the timing and process of unwinding the PHE is expected this fall
- While no impact to Health Connector membership is expected during Open Enrollment as a result of any potential PHE end, staff will be working to ensure a smooth transition for a presumed end date in 2022





Next Steps

Key Activities in the Months Ahead

October	Batches to use alternate data for subsidy eligibility verification
	 Using 2022 plans and rates, we will complete determining APTC amounts, mapping members to a 2022 plan, and sending renewal notices containing this information
	Members will continue making updates to their 2022 applications
November	Shopping begins November 1
	 Auto renewal transactions will be sent to carriers in late November for members who have not shopped
December	 Payments made by December 23 will be applied for January 1, 2022 coverage
January and beyond	 Communications, including tax forms and associated guidance, outreach to members who drop coverage for 2022, paperless communication and payment options, and continued reminders about the importance of keeping information up to date
	 Implementation of plans to help transition members from Medicaid to QHPs after the PHE ends

January 23, 2022-last day of Open Enrollment!



Our Focus Moving Forward

The Health Connector's key priorities for Open Enrollment 2022 are to provide clear pathways to renewal for existing members and to effectively reach and enroll new members in need of coverage.

- Our focus continues to be on ensuring a smooth renewal process for our existing membership (presently roughly 270,000 residents in individual market health coverage). Our priorities are ensuring that all those eligible for subsidies retain and/or obtain subsidies, particularly in light of the expanded benefits made possible through the American Rescue Plan (ARP)
- We are seeking to ensure that we find ever-new ways to reach and enroll the Commonwealth's remaining uninsured (still estimated to be roughly 3% of the population) through innovative, adaptive, equity-focused outreach and enrollment efforts, leveraging our own resources and our array of community partners
- We continue to be focused on using the visibility and energy naturally associated with Open Enrollment to highlight and bolster awareness among the Massachusetts public about the critical health and economic security benefits enabled by comprehensive health coverage, and the role that the state's marketplace plays in the broader continuum of coverage
- Staff will provide regular updates to the Board as Open Enrollment continues

