

MARKETPLACE ASSISTER TOOLKIT

Standard Operating Procedures Manual for Assisters in the Individual Federally-facilitated Marketplaces

SOP 14—RENEW HEALTH COVERAGE



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SOP 14 – Renew Health Coverage

A. Introduction

As an assister, you can help consumers renew their enrollment in plans through the Marketplace. Each year, the Marketplace initiates the renewal process for consumers who were determined eligible to enroll in a Marketplace plan during the previous year by redetermining those consumers' eligibility for the upcoming year. All Marketplace enrollees are responsible for notifying the Marketplace of any changes in their application information within 30 days of the change. This helps ensure that the Marketplace will accurately redetermine their eligibility. Any changes in consumers' coverage or eligibility resulting from the annual eligibility redetermination process will be effective on January 1 of the next year.

In 2020, if enrollees requested help paying for health coverage and agreed to allow the Marketplace to re-check their tax return information on an annual basis, the Marketplace will check the enrollees' income data from the Internal Revenue Service (IRS) and use it to redetermine their eligibility for help paying for health coverage during 2021.

If consumers have Medicaid or the Children's Health Insurance Program (CHIP) coverage, state Medicaid or CHIP agencies will generally redetermine their eligibility for these programs on an annual basis.

Each year, the Marketplace sends a Marketplace Open Enrollment Notice (MOEN) to consumers before Open Enrollment. This notice encourages consumers to return to the Marketplace during the upcoming Open Enrollment Period (OEP) by logging into their account at [HealthCare.gov](https://www.healthcare.gov) so they can update their application information, compare plan options, and re-enroll in or change coverage. Current enrollees should also check whether they are getting the correct amount of help paying for coverage and make sure they will enroll in coverage that will work best for them during the upcoming coverage year. The MOEN contains specific messaging for consumers at risk for losing advance payments of the premium tax credit (APTC) and cost-sharing reductions (CSRs) in the upcoming plan year. Consumers are at risk if they:

1. Did not authorize the Marketplace to request updated tax return information for use in the auto-re-enrollment process.
2. Authorized the Marketplace to request updated tax return information for use in the auto-re-enrollment process, and:
 - IRS indicates in response to the Marketplace's request for updated tax return information that APTC was provided for the tax filer for a prior coverage year, but the tax filer did not comply with the requirement to file an income tax return for the year for which APTC was provided and reconcile associated APTC (this status is called failure to file and reconcile, or FTR); or
 - Tax data reflects household income over 500 percent of the federal poverty level (FPL); or
 - Enrollees were automatically re-enrolled with APTC/CSR for the two previous benefit years and no income data is available from IRS for the prior two tax years.

Most current Marketplace enrollees will be automatically enrolled in the same plan (or another plan intended to be similar if that one is unavailable) for the next benefit year under the re-enrollment guidelines established by



the Marketplace if they don't do anything. However, if consumers don't return to the Marketplace and select 2021 coverage by December 15, 2020, they could miss out on better deals and cost savings for coverage starting on January 1, 2021. CMS advises assisters to strongly encourage all consumers—even those who plan to re-enroll in their same plan—to come back to the Marketplace to review their plan options as well as their application information. New plans and prices may be available to them, and they may never know unless they log in, update their application, and compare plans.

In addition to the MOEN, all consumers enrolled in a Marketplace plan will get a notice from their health insurance company before Open Enrollment. This notice will either tell them that they can renew their coverage for 2021 (known as a renewal notice) or that their Marketplace coverage is being discontinued (known as a discontinuance notice). The renewal notice estimates the consumer's future APTC amount based on the current year's APTC amount; the *actual* amount will appear on the January bill as well as the consumer's eligibility determination notice (EDN) from the Marketplace.

If the insurance company will discontinue the Marketplace plan or will not renew coverage in that plan, the Marketplace will generally choose a "crosswalk plan" intended to have similar features to the consumers' current plan unless they return to the Marketplace and change plans. The Marketplace sends these consumers another notice beyond the MOEN that describes this different plan. Consumers should be encouraged to return to the Marketplace during the OEP to make sure the new plan will meet their needs or to determine if there is another plan that is a better fit.

The remainder of this Standard Operating Procedure (SOP) provides guidance on how to assist consumers with their annual eligibility redeterminations and completing their renewal process.

B. Procedures

- Step 1.** All consumers with a Marketplace plan through the Marketplace for Plan Year 2020 will receive a MOEN before Open Enrollment that contains the following information:
- A notification that the OEP begins November 1, 2020, and ends December 15, 2020
 - A description of the annual eligibility redetermination and renewal process
 - The requirements to report changes affecting eligibility and the timeframe and channels to report changes
 - The key dates for ensuring coverage is effective on January 1, 2021
 - A reminder that enrollees who had APTC paid on their behalf must file a federal income tax return for that year and reconcile the associated APTC to be eligible for APTC in future plan years.

For more information on special instructions for consumers receiving APTC and CSRs, refer to Step 4.

- Step 2.** Assist consumers with reviewing their MOEN.



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- Step 3.** Explain to consumers that they should update their eligibility application with any new or changed information about themselves or their households. If there are no changes, consumers should still return to their account at [HealthCare.gov](https://www.healthcare.gov) to review their application, confirm the information is correct, and review their financial assistance and plan options.
- Step 4.** Assist consumers with reporting any changes or new information (e.g., annual household income, household size) to the Marketplace. Exhibit 2 describes possible Marketplace actions and changes to APTC and CSR eligibility if consumers report changes or new information and what happens if they don't.

For more information on helping consumers with reconciling APTC when filing a federal tax return, refer to [SOP 12 – Reporting Minimum Essential Coverage and Reconciling Advance Payments of the Premium Tax Credit](#).

- Step 5.** If consumers are unsure whether they agreed to allow the Marketplace to re-check their tax return information on an annual basis, tell consumers that they can return to the Marketplace to give this authorization when they update their 2021 eligibility and plan selection.
- Step 6.** Assist consumers with enrollment. **Changes submitted on a 2021 application generally do not take effect unless consumers complete the process by continuing to enrollment and selecting a plan.** If returning consumers want to keep their Marketplace plan for next year and it remains available, they should select the plan labeled “Your selected plan” at the top of the plan results on the Select a Health Plan screen.

Even if consumers are satisfied with their 2020 plan, it is still a good idea for consumers to compare plans to see what’s covered; find out whether their current plan covers their desired providers, services, and prescription drugs; and compare costs.

Exhibit 1 – Impact of Consumer Changes on APTC and CSRs

2020 Consumer Scenario	If consumer actively updates their application during the OEP for 2021	If consumer DOESN'T actively update their application during the OEP for 2021 (gets auto-reenrolled)
<ul style="list-style-type: none"> Previously applied for but were determined ineligible for APTC and CSRs for 2020. 	<ul style="list-style-type: none"> Receives an updated EDN based on the updated household income and household size information they provide, as well as updated guidelines (e.g., FPLs for 2020). 2021 APTC and CSR eligibility will be based on the updated household income and size information entered on the application. 	<ul style="list-style-type: none"> The Marketplace will automatically re-enroll them in the same or similar Marketplace plan for 2021 <i>without</i> APTC/CSRs. Consumers will receive an EDN and another notice in late December showing the plan they were re-enrolled into for 2021 and that they are not receiving financial assistance.



2020 Consumer Scenario	If consumer actively updates their application during the OEP for 2021	If consumer DOESN'T actively update their application during the OEP for 2021 (gets auto-reenrolled)
<ul style="list-style-type: none"> • Have APTC and CSRs in 2020, and • Agreed to allow the Marketplace to re-check their tax return information on an annual basis, and • Had APTC in 2019, and • Filed a 2019 tax return and reconciled 2019 APTC. 	<ul style="list-style-type: none"> • Receives an updated EDN based on the updated household income and household size information they provide, as well as updated guidelines (e.g., FPLs for 2020). • 2021 APTC and CSR eligibility will be based on the updated household income and size information entered on the application. 	<ul style="list-style-type: none"> • The Marketplace will re-enroll them in the same or similar Marketplace plan for 2021. • APTC and CSRs eligibility will be updated based on the consumer's most recent verified household income, updated FPL tables, and plan premiums.^{1,2} • Consumers will receive an EDN and another notice in late December showing the plan they were re-enrolled into for 2021 and whether they are receiving financial assistance.
<ul style="list-style-type: none"> • Have APTC and CSRs in 2020, and • Did not agree to allow the Marketplace to re-check their tax return information on an annual basis. 	<ul style="list-style-type: none"> • Receives an updated EDN based on the updated household income and household size information they provide, as well as updated guidelines (e.g., FPLs) for 2020). • 2021 APTC and CSR eligibility will be based on the updated household income and size information entered on the application. 	<ul style="list-style-type: none"> • The Marketplace will automatically re-enroll them in the same or similar Marketplace plan for 2021 <i>without</i> APTC/CSRs. • Consumers will receive an EDN and another notice in late December showing the plan they were re-enrolled into for 2021 and that they are not receiving financial assistance.

¹ The amount of APTC consumers receive in the new plan year depends on their household income and the premium cost for the second-lowest-cost Silver plan available through the Marketplace in their service area.

² [Guidance on the annual eligibility redetermination and re-enrollment for Marketplace coverage for 2019 and later years.](#)

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2020 Consumer Scenario	If consumer actively updates their application during the OEP for 2021	If consumer DOESN'T actively update their application during the OEP for 2021 (gets auto-reenrolled)
<ul style="list-style-type: none"> • Have APTC and CSRs in 2020, and • Agreed to allow the Marketplace to re-check their tax return information on an annual basis, and • Had APTC in 2019, and • Filed a tax return for 2019 and reconciled 2019 APTC in October 2020. 	<ul style="list-style-type: none"> • Because the IRS may not yet have processed the consumer's tax return, consumers should attest on the application to having filed a tax return and reconciled past APTC. This will make them eligible for APTC in 2021, if otherwise eligible. • Receives an updated EDN based on the updated household income and household size information they provide, as well as updated guidelines (e.g., FPLs for 2020). 	<ul style="list-style-type: none"> • The Marketplace automatically re-enrolls them in the same or similar Marketplace plan for 2021. • The Marketplace will check IRS data in early December and restore APTC to consumers whom IRS no longer flags as FTR. <ul style="list-style-type: none"> ○ If IRS shows no FTR status, the consumer will be re-enrolled with APTC/CSR, if otherwise eligible. ○ If IRS still shows an FTR status, the consumer will be re-enrolled without APTC/CSR. They can appeal this eligibility determination. • Consumers will receive an EDN and another notice in late December showing the plan they were re-enrolled into for 2021 and whether they are receiving financial assistance.
<ul style="list-style-type: none"> • Have APTC and CSRs in 2020, and • Agreed to allow the Marketplace to re-check their tax return information on an annual basis, and • Had APTC in 2019, and • Did not file a tax return for 2019 or reconcile 2019 APTC. 	<ul style="list-style-type: none"> • Receives an updated EDN based on the updated household income and household size information they provide, as well as updated guidelines (e.g., FPLs for 2020). • Since they did not file/reconcile for 2019, they will not attest to having done so and will be determined ineligible for APTC/CSRs. 	<ul style="list-style-type: none"> • The Marketplace will automatically re-enroll them in the same or similar Marketplace plan for 2021 <i>without</i> APTC/CSRs. • Consumers will receive an EDN and another notice in late December showing the plan they were re-enrolled into for 2021 and that they are not receiving financial assistance.



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2020 Consumer Scenario	If consumer actively updates their application during the OEP for 2021	If consumer DOESN'T actively update their application during the OEP for 2021 (gets auto-reenrolled)
<ul style="list-style-type: none"> • Have APTC and CSRs in 2020, and • Agreed to allow the Marketplace to re-check their tax return information on an annual basis, and • Had APTC in 2019, and • Filed a 2019 tax return and reconciled 2019 APTC, and • IRS data shows income over 500 percent FPL. 	<ul style="list-style-type: none"> • Receives an updated EDN based on the updated household income and household size information they provide, as well as updated guidelines (e.g., FPLs for 2020). • 2021 APTC and CSR eligibility will be based on the updated household income and size information entered on the application. 	<ul style="list-style-type: none"> • The Marketplace will automatically re-enroll them in the same or similar Marketplace plan for 2021 <i>without</i> APTC/CSRs. • Consumers will receive an EDN and another notice in late December showing the plan they were re-enrolled into for 2021 and that they are not receiving financial assistance.
<ul style="list-style-type: none"> • Have APTC and CSRs in 2020, and • Agreed to allow the Marketplace to re-check their tax return information on an annual basis, and • Was automatically re-enrolled in both 2020 and 2019 coverage, and • No IRS tax data is available for 2019 or 2018. 	<ul style="list-style-type: none"> • Receives an updated EDN based on the updated household income and household size information they provide, as well as updated guidelines (e.g., FPLs for 2020). • 2021 APTC and CSR eligibility will be based on the updated household income and size information entered on the application. 	<ul style="list-style-type: none"> • The Marketplace will automatically re-enroll them in the same or similar Marketplace plan for 2021 <i>without</i> APTC/CSRs. • Consumers will receive an EDN and another notice in late December showing the plan they were re-enrolled into for 2021 and that they are not receiving financial assistance.

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C. Next Steps

1. If consumers receive updated eligibility notices, proceed to *SOP 6 – Review Eligibility Results*.
2. If consumers would like to file an appeals request, proceed to *SOP 10 – Request an Eligibility Appeal*.
3. If consumers would like more information on reconciling APTC when filing a federal income tax return, proceed to *SOP 12 – Reporting Minimum Essential Coverage and Reconciling Advance Payments of the Premium Tax Credit*.
4. For more help answering consumers' specific questions, refer to [Appendix A: Frequently Asked Questions \(FAQs\)](#).



Appendix A: Frequently Asked Questions (FAQs)

These FAQs help assisters answer consumers' specific questions on renewing their health coverage through the Individual Marketplace.

FAQ 1. How will I know if my current coverage is available for renewal?

- Answer: Consumers will get a notice from two different sources before Open Enrollment begins, from the Marketplace and their health insurance company. The Marketplace will send a MOEN, and the health insurance company will send a notice that will either tell consumers that they can renew their coverage for 2021 (known as a renewal notice) or that their Marketplace coverage is being discontinued (known as a discontinuance notice). Enrollees who will receive a discontinuance notice can generally expect to receive it by the beginning of Open Enrollment.

FAQ 2. What happens if my current coverage is discontinued for the upcoming benefit year?

- Answer: For the 2021 coverage year, if your plan is discontinued and if state law allows, you will be enrolled automatically into a different plan, possibly with a different insurance company, based on a set of established rules. The best route is to return to the Marketplace and select a new plan of your choosing.

FAQ 3. Why was I redetermined as ineligible for coverage through the Marketplace?

- Answers: There are several reasons why consumers who were previously eligible for Marketplace enrollment may no longer be eligible when the Marketplace redetermines their eligibility, including incarceration or moving outside the service area of the Marketplace.



Appendix B: Support Resources

If consumers require assistance that is outside of assister activities, refer consumers to other organizations and resources as appropriate. Exhibit 2 provides a list of external resources.

Exhibit 2 – External Resources

Resources	Contact Information	What does this resource do?	How should consumers use this resource?
HealthCare.gov	HealthCare.gov	This website allows consumers to access information about the Patient Protection and Affordable Care Act and to enroll in health coverage through the Federally-facilitated Marketplace (FFM).	<ul style="list-style-type: none"> • To find out about health coverage options available through the FFM. • To apply for health coverage online.
Medicaid	Medicaid.gov	This state-administered health insurance program is for low-income families and children, pregnant women, the elderly, people with disabilities, and, in many states, other adults. The Federal Government provides a portion of the funding for Medicaid and sets guidelines for the program. States also have choices in how they design their program, so Medicaid varies state by state and may have a different name in your state.	<ul style="list-style-type: none"> • To find answers to questions about health coverage through Medicaid or CHIP. • To get further information about their state's Medicaid program and agency contact information.