

CMS Questions on Iowa's State Innovation Waiver Application  
October 5, 2017

IID Response – 10.6.17

1. Please send a final version of the new supplement so CMS can post it on our website so stakeholders are aware of the change. In addition, please post the supplement on Iowa's site to ensure the public is aware of the changes to the waiver application.
  - a. *Please see the attached. The final version of the supplement should be posted on our page today.*
  
2. Please provide a full schedule of premiums, premium credits, cost-sharing reductions, and after-credit premium amounts by income band and age. Please show all income levels for which an individual may be eligible for a premium credit.
  - a. *We are working to develop new schedules based on the revised supplement.*
  - b. *All individuals who have been determined eligible will receive a premium credit. However, individuals whose income is greater than 400% of the FPL will receive a premium credit based solely on age.*
  - c. *Premium credit amounts are available at: <https://stopgap.iowa.gov/>*
    - i. *Per our conversation on October 4, 2017, premium and cost sharing credits will be available to those who have income below 133%FPL. The premium credit chart in the link above will be updated to reflect as much.*
  
3. Please confirm that no applicants would be found ineligible for a premium credit due to income being too low.
  - a. *Total income is not an eligibility factor – no individuals will be denied based on their income level. Income will be used to determine the valuation of premium credit, but have no impact on eligibility determinations.*
  - b. *We will update all income references of '133-150%'FPL to 'up to 150%'FPL.'*
  
4. Please specify what notice regarding potential Medicaid or CHIP eligibility will be provided to applicants for premium credits. Please specify what, if any, income thresholds or other criteria will determine whether an applicant receives such notice.
  - a. *We will provide language on stopgap.iowa.gov regarding potential Medicaid and/or CHIP eligibility. This language will provide an overview of what factors may qualify an individual for Medicaid and/or CHIP, and direct the individuals to the Iowa DHS website to go through that eligibility process.*
  - b. *We anticipate that agents who are helping individuals to enroll will be able to advise individuals that they may be eligible for Medicaid based on their income level.*
  - c. *The eligibility application states, "This application does NOT assess your eligibility for Medicare, Medicaid or CHIP. If you believe you (or someone for whom you're applying for coverage) may be eligible for any of these programs, you will need to fill out an application directly through that particular program."*

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5. Please specify Iowa's contingency plans for delays in eligibility and enrollment processing. Please include:

- a. When will individuals be able to enroll in coverage and when will that coverage be effective if their eligibility for a premium credit is delayed beyond Dec. 15? Beyond Jan. 1?
  - i. *Eligibility is not conditioned on premium credit amounts. Any individual who completes the eligibility application by the end of open enrollment will be eligible to sign up with a carrier.*
- b. If an individual enrolls in coverage with no premium credit due to a delayed eligibility determination and is later determined eligible for a premium credit, will the premium credit amount be adjusted, either prospectively or through retroactive payments, to account for months during which the individual was enrolled without a credit?
  - i. *All individuals will receive a premium credit, although those whose income cannot be initially verified will receive a premium credit based solely on age, (as if their income was above 400%FPL). Any updates to premium credit allocation will be made prospectively only. This is why we will encourage individuals to apply as soon as open enrollment opens, in order to address any eligibility questions or concerns during this process. We will not be making any retrospective changes to premium credit allocations.*
- c. If individuals are unable to effectuate coverage by Jan. 1, how will they access necessary health services?
  - i. *Individuals will need to enroll in the Iowa Stopgap Measure during open enrollment or through a special enrollment period, if applicable. Those who do not enroll and who need services will need to work with their provider (which may be a safety net provider) to receive and pay for services. Iowa has an extensive network of safety net providers including community health centers, rural health clinics, free clinics, maternal and child health centers, local boards of health that provide direct services, Iowa family planning network agencies, and child health specialty clinics available to assist uninsured Iowans.*