

TRIBAL MEMBER WORKAROUND PROPOSAL

Issue: Households with at least one tribal member and one non-tribal member are unable to enroll on the same application without forfeiting tribal benefits (i.e. zero dollar cost sharing). In addition, these households are unable to calculate and apply their max advanced premium tax credit (APTC) on a single application. Generally, this results in reduced tax credits and higher premiums; although, the difference in tax credit may be collected upon reconciliation with the IRS.

Proposed Workaround:

1. Household enrolls on separate applications,
 - a. applies the correct CSR tier per FPL
 - b. ensures access to plans with 02 variants.
2. Primary Applicant in household contacts HBE designated point of contact (HBE Account Worker).
3. As of April 17, we have new system functionality that will allow an HBE Account Worker to manually calculate the appropriate APTC based on all members enrolling on the same application and apply that APTC across the multiple applications.
4. If report a change, APTC calculated and applied by account worker will be overridden. This will require training and outreach. Therefore, we would like your input on how best to proceed:
 - a. Set a flag to remind individuals to contact the HBE POC for changes (flag will prevent them from reporting any changes)
 - b. HBE Account Worker must be contacted if household wants to report changes at a later date, including access to monthly SEP.
5. Target Date: propose to begin training as of July 1 (navigators, CSRs, and tribal assisters)