

Title	Tribal/Non-Tribal Household Applications
Last Revised	Aug 3, 2017
Status	Final
Contributors	Marney Gagnon, Steven O'Brien, Shaina Mittelstead, Mike Stanek, Jim Byers, James Manuel, and Carrie Wolfe
Approver(s)	Joanna Donbeck, Randi Schaff, and Deborah Sosa
Location	Training and Business Processes SharePoint Site
See Also	

Tribal/Non-Tribal Household Applications

REFERENCES:

- **Applicable Law**
 - [Populated by Policy](#)
 - [45 C.F.R. § 155.420](#)
 - [Affordable Care Act](#)
 - [REG-131491-10: Health Insurance Premium Tax Credits](#)

OVERVIEW:

The Affordable Care Act (ACA) includes regulations specific to American Indian and Alaska Native (AI/AN) customers. The Washington Health Benefit Exchange (WAHBE) adheres to these regulations and has specific policy and procedures for processing AI/AN tribal applications.

In the case of households that include at least one tribal member and one non-tribal member, customers are unable to enroll on the same application in *Washington Healthplanfinder* (HPF) without forfeiting certain tribal benefits (i.e. zero dollar cost sharing). In addition, these households are unable to apply their maximum advanced premium tax credit (APTC) on a single application. This can result in reduced tax credits and higher premiums.

The standard business process for households seeking coverage with at least one tribal and non-tribal member is to use separate, linked applications in HPF. This allows the correct tribal benefits to apply to the household. When the household is eligible for APTC, a manual adjustment must be processed in order to apply the full APTC amount to the linked applications. The following business process outlines the steps to follow for this situation.

PROCESS:

Actor	Step	Activity
Person/system/thing performing step	#	<i>Step being performed</i>
Customer	1	Contacts Customer Support Center to apply for coverage with a AI/AN household member and non-AI/AN household member; then
Customer Service Representative (CSR)	2	Transfers customer to the designated team that handles the Tribal Specialty customer service queue; and
Tribal Specialist Customer Service Representative (CSR)	3	Assists customer to fill out two separate applications with the same Primary Applicant (PA) and household information. The only difference is that the tribal member(s) are seeking coverage on one application and not seeking coverage on the other. Using the same PA on both applications ensures the applications will be linked in HPF:

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		<ul style="list-style-type: none"> a) Complete the first application for the AI/AN household member b) Member selects one of the AI/AN plans on the "Explore Your Options" screen and selects the plan c) Complete second application for the non-AI/AN household member(s) from the original PA's dashboard by selecting "Complete another Application" in Quick Links d) Use the same information on the second application as the first application except the tribal member(s) are not seeking coverage e) Non-tribal household members in the second application can select a plan; then
	4	Notifies the customer that their initial correspondence letter will indicate the APTC amount based on separate enrollment, but they will receive a follow up correspondence indicating the modified APTC amount once the manual adjustment is processed (typically same day); and
	5	Notifies the customer that reporting any change (other than disenrollment) on either application in the future will overwrite the APTC manual adjustment. If they contact the Customer Support Center, the change can be reported and the manual APTC adjustment can be processed again; and
	6	Submits a Zendesk ticket to L2 Operations using the "AI/AN Household Application – Eligibility Review" macro; then
L2 Operations Account Worker	7	Reviews Zendesk tickets daily for any "AI/AN Household Application – Eligibility Review" tickets; and (when found)
	8	Uses Self-Service Utility (SSU) tool and manual Excel spreadsheet to calculate the full APTC for the household and apply the amount to the linked applications (generally this means splitting the adjusted APTC amount to each application). This adjustment is made on the same day the application is processed according to the Enrollment Analysts Service Level Agreement; and
	9	Documents the manual process in the Application Notes (on Application Review screen); and
	10	Uploads the Excel spreadsheet with manual APTC calculation to the Document Center on both applications in HPF; and
	11	Uses the public reply from Zendesk to notify the customer that their APTC has been adjusted (using General Notice - Tribal Mixed Household Manual APTC template indicated in Step 14); and
	12	Sends e-mail to CSA 3 Operations Team (Customer Service Application Super Admin role for operations) and requests that a standard, blue static warning message be placed on the customer's account home dashboard in the Customer Service Application (CSA) tool; and
	13	Closes Zendesk ticket; and
	14	Uses HPF to send General Notice correspondence to the customer using the Tribal Mixed Household Manual APTC template (see template on Page 4); then

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CSA 3 Operations Team Member	Uses Customer Service Application (CSA) to place a standard, blue static warning message (see standard message on Page 5) on the dashboards of the customer applications (in CSA only) warning that manual APTC adjustments were made and any changes reported in the future (other than disenrollment) will require another manual adjustment process
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EXAMPLE SCENARIO:

John and Sue are married and have one child together named Mary. Sue and Mary are members of a federally recognized tribe. Sue contacts the Customer Support Center outside of the Open Enrollment Period to get assistance with filling out an online application. Since tribal customers may enroll throughout the year (monthly SEP), the Customer Service Representative (CSR) assists Sue with filling out an application with Sue as the Primary Applicant, John as spouse, and Mary as a dependent. Sue and Mary are marked as seeking coverage. Sue selects a plan for herself and Mary. The CSR assists Sue with filling out a second identical application except Sue and Mary are marked as not seeking coverage and John is marked as seeking coverage. Sue selects a plan for John. The household is eligible for APTC, but in order to apply the full APTC amount for the household, the CSR informs Sue about the manual adjustment necessary and explains the correspondences they will receive. The CSR submits a Zendesk ticket for the APTC manual adjustment and informs Sue that if she needs to report a change to either application in the future, the manual adjustment for the APTC will need to be applied again.

ADDITIONAL NOTE:

This APTC adjustment process can also be applied for tribal/non-tribal households that already have existing enrollment coverage.

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**Washington Healthplanfinder (HPF) General Notice Template
For Tribal Mixed Household Manual APTC**

There has been a change in the amount of health insurance premium tax credits you get for your Washington Healthplanfinder enrollment.

Due to system limitations, our customer support team has manually worked to make sure you have access to the full amount of tax credits you are eligible for, based on your household size and reported income. Changes reported to your application in the future will require additional support, in order for you to retain the full amount of tax credits. To prevent unexpected changes to your tax credits, please let us know about any changes you make to your application by contacting the Customer Support Center:

Toll-free support is available 8 a.m. - 6 p.m. Monday - Friday
1-855-923-4633; TTY: 1-855-627-9604

Below is your current health plan information, including your updated tax credit amount and new monthly premium:

Health Insurance Company: <<health plan name>>

Plan Metal Level: <<metal level>>

Monthly Plan Premium: <<\$\$>>

Applied Tax Credit: <<\$\$>>

Your Monthly Premium: <<\$\$>>

Coverage Start Date: <<mm/dd/yyyy>>

Coverage End Date: <<mm/dd/yyyy>>

Enrolled Members: <<individual names>>

These tax credits do not apply to any dental plan in which you may be enrolled.

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Standard Warning Message for CSA:

"A manual tax credit adjustment has been applied to this linked application for an AI/AN tribal/non-tribal household. Any future change reporting on either application, other than disenrollment, will override the tax credit adjustment. Another manual tax credit adjustment is required in order to maintain the full tax credit benefit for the AI/AN household."