



# PY2024 Auto Re-Enrollment: Bronze to Silver Crosswalk for Assisters



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# Bronze to Silver Crosswalk Policy

The 2024 Payment Notice allows Exchanges to auto re-enroll existing enrollees from a bronze plan into a silver plan (unless they return to the Exchange and actively select a plan) **if**:

1. They are eligible for income-based cost-sharing reductions (CSRs), are currently enrolled in a bronze level qualified health plan (QHP), and would otherwise be automatically re-enrolled in a bronze-level QHP; AND
2. The silver-level QHP (with CSRs) is in the **same product** with the **same provider network** as the bronze level QHP into which they would have otherwise been re-enrolled; AND
3. The silver-level QHP has a **premium** after the application of Advance Payments of the Premium Tax Credit (APTC) that is **lower than or equivalent to** the premium of the bronze level QHP into which they would have otherwise been re-enrolled.

# Example 1

- Carla is currently enrolled in a bronze level QHP in Florida.
- For PY2024, her projected household income of \$15,000 is below 250 percent of the federal poverty level (FPL), and she is otherwise eligible for APTC, making her eligible for CSRs.
- Her issuer, ABC Insurance, offers a silver level QHP for PY2024 in the same product with the same provider network as the bronze level QHP into which she would be auto re-enrolled for PY2024.
- The premium, after APTC, for the bronze level QHP will be \$0/month.
- The premium, after APTC, for the silver level QHP will be \$0/month.
- Carla will be crosswalked to the silver level QHP for PY2024.



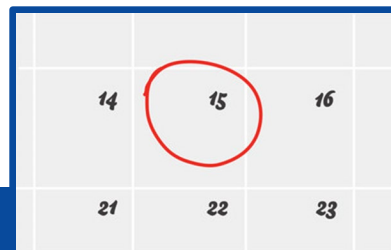
# Example 2

- Jared is currently enrolled in a bronze level QHP in Texas.
- For PY2024, his projected household income of \$17,000 is below 250 percent of the FPL, and he is otherwise eligible for APTC, making him eligible for CSRs.
- His issuer, XYZ Insurance, does not have a silver level QHP for PY2024 in the same product with the same provider network as the bronze level QHP into which he would be auto re-enrolled.
- Jared will NOT be crosswalked into a silver level QHP for PY2024; he will be auto re-enrolled into his bronze level QHP, if he does not return to the Exchange and choose a different plan.



# Bronze to Silver Crosswalk: Enrollee Experience

- Enrollees in Federally-facilitated Exchanges (FEEs) and State-based Exchanges on the Federal platform (SBE-FPs) who may be auto re-enrolled to a silver plan because of the new bronze to silver crosswalk policy will receive a notice from the Exchange advising them that they will be re-enrolled into a silver plan if they do not make an active selection on or before December 15. They will also receive a similar notice from their issuer.
- These enrollees will also see the silver plan highlighted in the online shopping experience if they return on or before December 15 to review their options.



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# Bronze to Silver Crosswalk: Enrollee Experience (Cont.)

Enrollees in FFEs and SBE-FPs who (1) are crosswalked from a bronze plan to a silver plan because of the new policy, and (2) do not make an active selection on or before December 15:

- Will receive an additional communication from the Exchange after December 15 reminding them of their new plan enrollment for January 1, and that they can select a different plan by January 15 that would be effective starting February 1 (unless eligible for a Special Enrollment Period (SEP)).
- This communication will tell enrollees whose current product is no longer available for renewal that they qualify for a loss of Minimum Essential Coverage (MEC) SEP.

For examples of Exchange Notices, visit: [CMS.gov/marketplace/in-person-assisters/applications-forms-notices](https://www.cms.gov/marketplace/in-person-assisters/applications-forms-notices).

# Bronze to Silver Crosswalk Policy: Timing

- CMS will implement this policy for PY2024 for:
  - FFEs;
  - FFEs where States perform Plan Management Functions; and
  - SBE-FPs.
- State-based Exchanges have the option to implement this policy beginning with PY2024.



# Similar Network Policy

- Rules already require Exchanges to reenroll enrollees whose current plan will no longer be available into a plan that is similar based on product type and, generally, metal level.
- The 2024 Payment Notice also requires that all Exchanges (Exchanges on the Federal platform and State-based Exchanges) incorporate network similarity into the auto re-enrollment criteria for PY2024.





# Similar Network Policy (Cont.)

- CMS will implement this policy in the FFEs and SBE-FPs by incorporating plan network ID into the auto re-enrollment process, while continuing to take into account enrollees' current year product.
- However, CMS will permit issuers to submit justifications if they believe a different network ID in the following plan year is better suited as a crosswalk option for enrollees in a particular plan.



# Bronze to Silver Crosswalk: Cross-Issuer Re-enrollments

Enrollees for whom no QHPs from the same issuer are available through the Exchange may be enrolled in a QHP issued by a different issuer, to the extent permitted by applicable State law.

State regulatory authorities and Exchanges have the option to apply the bronze to silver crosswalk policy to the approach that they use for cross-issuer re-enrollments.



# Bronze to Silver Crosswalk: Cross-Issuer Re-enrollments (Cont.)

In Exchanges on the Federal platform:

- When a State defers to the Exchange, CMS will apply the bronze to silver crosswalk policy in cases that meet all three criteria discussed earlier.
- When the State regulatory authority conducts the cross-issuer enrollment process, CMS will defer to that State regulatory authority with regard to whether to incorporate the bronze to silver crosswalk policy into cross-issuer auto re-enrollment.



# Summary

- Consumers who are in a bronze QHP for PY2023 may come to you with a notice showing that they are being crosswalked into a silver QHP for PY2024 because their plan availability met the criteria discussed above.
- You can help these consumers by explaining:
  - Why they were crosswalked into a silver QHP, and that this silver QHP covers the same benefits and health care providers that their 2024 bronze plan would cover;
  - That the crosswalk was done based on previously verified income or information from the Exchange's trusted data sources and that changes in their household income could impact their premiums and eligibility for CSRs; and
  - That they can accept the new plan or return to the Exchange to choose a different plan.
- CMS will implement this policy in all Exchanges on the federal platform for PY2024.
- State-based Exchanges will have the option to implement this policy beginning with PY2024.

**Note: You should always encourage consumers to return to the Exchange each year to update their information and select the plan that best meets their needs.**