



SBE Redeterminations Template

September 2, 2025

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Background

Regulations under 45 CFR §155.335 require that Exchanges redetermine the eligibility of a qualified individual annually. The Exchange must conduct annual redeterminations using one of the following methods:

- Option 1: The procedures described in §155.335(a)(2)(i).
- Option 2: Alternative procedures specified by the Secretary for the applicable benefit year §155.335(a)(2)(ii); or
- Option 3: Alternative procedures to be approved by the Secretary under §155.335 (a)(2)(iii). Under this section, Exchanges have the flexibility to submit alternative procedures to be approved by the Secretary. The alternative procedures must:
 - Demonstrate that Exchange would facilitate continued enrollment in coverage for which the enrollee remains eligible.
 - Provide clear information about the process to the qualified individual or enrollee (including regarding any action by the qualified individual or enrollee necessary to obtain the most accurate redetermination of eligibility).
 - Provide adequate program integrity protections.

Review and Approval for SBE Redetermination and Re-Enrollment Plans

All states newly electing to be State-based Exchanges (SBEs) must submit their redetermination and re-enrollment plans to the Centers for Medicare & Medicaid Services (CMS) for review as part of the Blueprint Application approval process. Subsequently, SBEs must submit their redetermination and re-enrollment plans for the upcoming Open Enrollment through the annual State-based Marketplace Annual Reporting Tool (SMART) submission, and identify any changes from their previously reviewed plan. States must submit the plans on the following template. CMS reviews each SBE redetermination plan in accordance with CFR 155.335 and conducts any necessary follow up during the SBE's Open Enrollment Readiness Review (OERR). CMS addresses any non-compliance issues through the SMART.

SBE Redeterminations and Re-enrollment Procedures for Plan Year [XXXX]

Exhibit 1: Identify Changes.

Identify Changes	SBE Response
1. Have there been any updates or operational changes to this year's alternative redeterminations plan from the year prior? Please describe any major programmatic, policy, or operational changes that impact the eligibility redetermination process that your Exchange will implement for this plan year.	

Exhibit 2: Eligibility Redeterminations

Eligibility Redeterminations	SBE Response
1. Provide a description of the SBE's process for conducting eligibility redeterminations, including: <ol style="list-style-type: none"> Dates for conducting the redeterminations (specific date or date range). Type of consumers who receive a redetermination (e.g., only existing enrolled consumers or all consumers who were previously determined eligible). Steps for handling consumers without an active authorization to obtain tax information for use in annual redetermination. 	

Eligibility Redeterminations	SBE Response
<p>2. Provide an overview of how consumer eligibility is determined, including:</p> <ul style="list-style-type: none"> a. Eligibility verifications that the Exchange will conduct via the Federal Data Services Hub (FDSH). b. Eligibility verifications that the Exchange conducts through data sources other than the FDSH. <ul style="list-style-type: none"> i. If the Exchange uses non-FDSH data sources, what are they and for what type of eligibility verification? c. Confirmation that eligibility will be redetermined using updated eligibility data (i.e., the updated Federal Poverty Level [FPL] tables, the applicable benchmark plan, and premium and affordability percentage adjustments). d. Whether the Exchange will conduct income verifications using the FDSH Renewal and Redetermination Verification (RRV) service, or the FDSH Income and Family Size Verification (IFSV) synchronous service for eligibility redeterminations. e. What kind of income values returned from the FDSH (e.g. adjusted gross income [AGI], modified adjusted gross income [MAGI], or both) is the SBE able to use in eligibility redeterminations? How does the Exchange use these income values in eligibility redeterminations? 	
<p>3. Are there any anticipated changes in FDSH utilization, particularly any anticipated increased usage of FDSH, from previous years?</p>	

Exhibit 3: Re-enrollment Process.

Re-Enrollment Process	SBE Response
<p>1. Describe the populations or groups who will be eligible for automatic re-enrollment, including:</p> <ul style="list-style-type: none"> a. Type of groups who will not be eligible for automatic re-enrollment and any income thresholds applied. b. Percentage of consumers the Exchange expects to be eligible for auto-renewals. 	

Re-Enrollment Process	SBE Response
2. Describe the procedures for mapping consumers to another plan, if the Exchange is no longer offering their plan. a. If using a plan crosswalk, please provide details.	
3. Does the Exchange map consumers to another plan under circumstances other than instances where their plan is no longer offered? a. If yes, please describe the circumstances and provide supplemental information on the process for identifying these cases and crosswalk used.	
4. Provide a timeline for sending re-enrollment transactions to carriers, including: a. Date/date range when auto-renewals will be reflected in plan selections.	
5. Does the Exchange conduct re-enrollments at the same time as redeterminations or do consumers have the opportunity to view and shop for plans prior to being auto-renewed?	
6. Describe any major policy or operational changes to this year's annual redetermination process that the Exchange will implement for the upcoming plan year.	

Exhibit 4: Program Integrity Updates

Program Integrity Updates	SBE Response
1. Confirm the SBE's processes and procedures regarding the "Failure to Reconcile" (FTR) tax filing requirements are in compliance with CFR 155.305(f)(4) for the coming plan year, including: a. FTR codes that will be returned from the FDSH (i.e., 007, 009, 010, 011). b. Timing to conduct initial FTR check. c. Confirmation of whether the Exchange will allow consumers to self-attest to meeting their tax filing and reconciliation requirement to override the FTR data flag from the Internal Revenue Service (IRS). i. If so, confirm whether the Exchange will recheck consumer attestations against IRS data at a later date; and ii. Confirm the date/timeframe when the Exchange will recheck consumer attestations against IRS data.	

Program Integrity Updates	SBE Response
2. Describe the actions the Exchange will take (e.g., removal of Advance Premium Tax Credit [APTC]) as a result of FTR flags indicating consumers have not met their tax filing and reconciliation requirements, including: <ol style="list-style-type: none"> Approach and timelines for sending notices. 	
3. Please describe the SBE's functionality with regards to maintaining and sharing consumers' protected Federal Tax Information (FTI) and data. <ol style="list-style-type: none"> Is the SBE able to retain FTI as part of data collection efforts and track different FTR codes returned from the FDSH? Is the SBE able to send consumer FTI as part of its education and approach to providing notice? 	
4. If the SBE is limited with regards to use and dissemination of consumer FTI, please describe the obfuscation approach used both in consumer outreach and notifications as well as in back-end eligibility logic and data collection.	

Exhibit 5: Customer Outreach and Education Program

Consumer Outreach and Education Program	SBE Response
1. Describe the SBE's consumer outreach and education procedures regarding redeterminations and renewals during open enrollment, including: <ol style="list-style-type: none"> Number and type of notices. Timeframe for sending redetermination notices and timeframe for sending re-enrollment notices. Content for each population/group of consumers. Whether actual or projected premium rates are included in the notice(s). Whether actual or projected APTC amounts are included in consumer notice(s). 	
2. Describe the Exchange's QHP issuers' consumer outreach and notification approach regarding Open Enrollment and renewals, include: <ol style="list-style-type: none"> Description of the content that the Exchange will include in consumer notices from QHP issuers. Description of the timeline issuers use to send Open Enrollment and renewal activities to consumers. 	

Consumer Outreach and Education Program	SBE Response
<p>3. Are there any other outreach activities outside of SBE notifications and QHP issuer notifications that the SBE engages in to educate consumers on their eligibility redeterminations and re-enrollments? (e.g., call center activities, or advertisements targeted to current enrollees)?</p>	

PRA Disclosure Statement

According to the Paperwork Reduction Act of 1995 (PRA), no persons are required to respond to a collection of information unless it displays a valid Office of Management and Budget (OMB) control number. The valid OMB control number for this information collection is 0938-1244. This information collection is required for states electing to operate a State Exchange. CMS will use information provided by states collected through the SBE Redeterminations Template tool to evaluate compliance with Exchange regulatory requirements and standards. This report includes attestations of compliance with Affordable Care Act (ACA) requirements, attestations of compliance with eligibility and enrollment requirements, performance monitoring data, and the annual financial statement and external financial and programmatic audit report. The time required to complete this information collection is estimated to average 210 hours per response for SBEs and 191 for State-based Exchanges on the Federal Platform (SBE-FPs), including the time to review instructions, search existing data resources, gather the data needed, to review and complete the information collection. This information collection is required for states wanting to operate a State Exchange pursuant to 45 CFR §§ 155.1200 and 155.1210 and is private/confidential to the extent permitted by law. If you have comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to:

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