



Health Care Reform in Indian Country

Self-Governance Communication & Education

Self-Governance Tribes Striving Towards Excellence in Health Care

American Indian and Alaska Native (AI/AN) Marketplace Enrollment and Cost-Sharing Payments, as of November 2017¹

January 23, 2018

This brief provides data to Tribes on the number of AI/ANs enrolled in health insurance coverage through a Marketplace in 2017, enrollment trends among AI/ANs over the past two years, and the average amount of cost-sharing payments made on behalf of AI/AN enrollees who receive Indian-specific cost-sharing protections.

Background

Health Insurance Marketplaces, established by the Affordable Care Act (ACA), allow consumers to compare available health plans, determine eligibility for federal financial assistance (such as premium tax credits), and enroll in comprehensive health insurance coverage. To assist AI/ANs in accessing health care services when enrolled in Marketplace coverage, the ACA established Indian-specific cost-sharing protections, under which AI/ANs who meet the ACA definition of Indian pay no deductibles, coinsurance, or copayments when receiving essential health benefits.^{2,3} AI/ANs meeting the ACA's definition of Indian can enroll in either a zero or limited cost-sharing plan, depending on their income level.

The Centers for Medicare and Medicaid Services (CMS) has provided reports for 2015, 2016, and now 2017 on enrollment of AI/ANs through the Federally-Facilitated Marketplace (FFM). For the first time, CMS has provided data (for 2017) on enrollment of AI/ANs through State-Based Marketplaces (SBMs).⁴

AI/AN Marketplace Enrollment

Attachment A below provides data on AI/AN Marketplace enrollment in the 39 states with an FFM.⁵ The table shows, by state, the number of AI/ANs meeting the ACA's definition of Indian enrolled through the Marketplace in states with an FFM, as well as the number of others eligible for services through the Indian

¹ This brief is for informational purposes only and is not intended as legal advice. For questions on this brief, please contact Doneg McDonough, TSGAC Technical Advisor, at DonegMcD@Outlook.com.

² The definition of Indian under the ACA is a member of an Indian Tribe or shareholder in an Alaska Native regional or village corporation. In addition, data are provided in this brief on enrollment of IHS-eligible individuals who are non-enrolled members of a Tribe.

³ The ACA also prohibits health insurers from reducing payments to Indian health care providers (IHCPs) by the amount of any cost-sharing that AI/ANs would have owed without these protections.

⁴ For the data on enrollment through SBMs, only data on AI/ANs meeting the ACA's definition of Indian were provided, and not data on other (non-enrolled) IHS-eligible individuals.

⁵ The data in Attachments A, B, and D include figures for states with an FFM, State-Based Marketplace on the Federal Platform, or State-Partnership Marketplace (all states using the HealthCare.gov platform).

Health Service (IHS)⁶ who enrolled in a plan, in 2016 and 2017. The table also shows the change in enrollment of AI/ANs in Marketplace coverage in states with an FFM, by state, from 2016 to 2017.

- **As of November 2017, a total of 59,405 AI/ANs (including AI/ANs meeting the ACA’s definition of Indian (32,778) and other IHS-eligible individuals (26,841)) were enrolled in Marketplace coverage in states with an FFM.**
- **Nationwide, overall enrollment of AI/ANs in Marketplace coverage in states with an FFM increased by 3,834, or 6.8%, from 2016 to 2017.**

The change in overall enrollment of AI/ANs through the FFM masks significant differences in the year-to-year enrollment between the two groups of AI/AN comprising the total.

- **For AI/ANs meeting the ACA’s definition of Indian (who are eligible for comprehensive cost-sharing protections under Marketplace coverage), enrollment through the FFM grew by 20.7% from 2016 to 2017.**
- **For other IHS-eligible individuals, enrollment through the FFM declined by 6.2% from 2016 to 2017.**

Figure 1 of Attachment B below includes a graph on AI/AN Marketplace enrollment in states with an FFM for 2015, 2016, and 2017, with enrollment levels (and year-to-year percentage changes) shown for the two categories of AI/ANs.

In Table 2 of Attachment C below, data are provided on AI/AN Marketplace enrollment in the 12 states with an SBM. The table shows, by state, the number of AI/ANs who enrolled in a zero or limited cost-sharing plan through the Marketplace in states with an SBM in 2017.

- In 2017, 6,107 AI/ANs enrolled through a SBM and secured one of the two types of Indian-specific cost-sharing reductions (CSRs).⁷

In Figure 2 of Attachment C, available data for 2017 are provided for each enrollment category.

- In 2017, AI/ANs enrolled in Marketplace coverage (through an FFM or SBM) who meet the ACA’s definition of Indian totaled 38,885.
- When enrolled Tribal members (in FFM and SBM states) are combined with other IHS eligible individuals (in FFM states), AI/AN enrollment totaled 65,726 in 2017.

Cost-Sharing Payments Made on Behalf of AI/AN Marketplace Enrollees

Attachment D, Table 3 below provides data on average cost-sharing payments made to health plans by the federal government on behalf of AI/ANs who enrolled in a zero or limited cost-sharing plan through the Marketplace in states with an FFM. Nationwide, these payments averaged \$1,988 per health insurance

⁶ These AI/ANs do not meet the ACA definition of Indian and thus do not qualify for the Indian-specific cost-sharing protections.

⁷ Data on enrollment of other IHS eligible individuals in SBM states was not provided by CMS.

policy per year, or \$166 per enrollee per month, in 2016. Data on average cost-sharing payments for 2017 is not yet available.

Additional Information on AI/AN Enrollment Through the FFM and SBM

In Attachment E, the full CMS report is provided on AI/AN enrollment through the FFM in 2017. The table is labeled “*Table 4: American Indian and Alaska Native Applicants and Enrollees (Active) in the Federally-Facilitated Marketplace.*”

The table provides information on enrollment through the FFM by the following factors:

- By age group;
- By metal level;
- By gender;
- By special enrollment period (SEP) code;
- By cost-sharing reduction type; and
- By state.

A number of policy and operational issues come into question from a review of these data. For example:

- A sizable number of AI/ANs took the time to begin an application to enroll in the FFM but ultimately did not enroll.
 - 48,838 individuals identified as meeting the ACA’s definition of Indian were determined to be eligible for qualified health plan (QHP) enrollment through the FFM. Of this total, only 32,778 (67%) actually selected and enrolled in a health plan.
 - With regard to other IHS-eligible individuals, the difference in the number being determined eligible for QHP enrollment through the FFM and the number actually enrolling in a plan were even starker. 74,940 IHS-eligible individuals were determined eligible for QHP enrollment through the FFM, but only 26,841 (or 36%) actually enrolled.

These percentages might (or might not) mirror experiences with the general population, but they also might indicate an interest and opportunity to increase AI/AN enrollment in Marketplace coverage.

- With regard to CSR type, for enrollees who meet the ACA’s definition of Indian and, as such, are eligible for the comprehensive Indian-specific CSRs as long as other conditions are met, not all received the comprehensive Indian-specific CSRs.
 - Of the 32,778 AI/ANs meeting the ACA’s definition of Indian enrolled in Marketplace coverage through the FFM, only 28,213 (86%) received the comprehensive Indian-specific CSRs.
 - Nearly 9% (2,819) of these enrollees received the much less comprehensive CSRs that are available to the general population.
 - More than 5% of these enrollees (1,746) received no CSRs.

More effective outreach to AI/AN Marketplace enrollees might be required to prevent, for instance, enrollment of eligible and non-eligible family members in the same health plan, as this will block eligibility for the Indian-specific cost-sharing protections.

- The data provided on plan “metal level” of AI/AN Marketplace enrollees might indicate an additional opportunity for improving education of AI/AN enrollees.
 - 77% of Tribal member enrollees enrolled in bronze-level Marketplace coverage, 20% in silver-level coverage, and 2% in platinum- or gold-level coverage.
 - Given the availability of the comprehensive Indian-specific cost-sharing protections for these individuals, the extra premium costs for the 23% of enrollees with Marketplace coverage above the bronze metal level might not be necessary or beneficial. The above-bronze metal level coverage could be beneficial, though, in instances where an AI/AN is eligible for the limited CSR but does not have access to referrals for cost-sharing from an Indian health care program.⁸

⁸ For AI/ANs enrolled in Marketplace coverage who qualify for the limited CSR, to secure the cost-sharing protections when seeing non-Indian health care providers, a referral for cost-sharing is needed from an Indian health care program.

Attachment A

Table 1: Enrolled Tribal Members ¹ and IHS Eligibles with Coverage through the Federally-Facilitated Marketplace (FFM), 2016 and 2017 ^{2,3}								
State	Enrolled Tribal Members ⁴			Other IHS Eligibles ⁴			All	
	2016	2017	% Change	2016	2017	% Change	2017 vs. 2016	% Change
Alabama	435	651	49.7%	1,053	1,216	15.5%	379	25.5%
Alaska	638	679	6.4%	146	122	-16.4%	17	2.2%
Arizona	946	831	-12.2%	766	615	-19.7%	-266	-15.5%
Arkansas	480	542	12.9%	306	297	-2.9%	53	6.7%
Delaware	17	24	41.2%	102	93	-8.8%	-2	-1.7%
Florida	963	1,081	12.3%	2,923	2,856	-2.3%	51	1.3%
Georgia	296	327	10.5%	1,469	1,442	-1.8%	4	0.2%
Hawaii	26	51	96.2%	83	121	45.8%	63	57.8%
Illinois	295	303	2.7%	984	811	-17.6%	-165	-12.9%
Indiana	147	160	8.8%	521	428	-17.9%	-80	-12.0%
Iowa	86	94	9.3%	119	108	-9.2%	-3	-1.5%
Kansas	740	835	12.8%	529	468	-11.5%	34	2.7%
Kentucky ⁵	--	69	--	--	161	--	230	--
Louisiana	292	226	-22.6%	773	462	-40.2%	-377	-35.4%
Maine	177	188	6.2%	254	259	2.0%	16	3.7%
Michigan	1,013	1,011	-0.2%	950	817	-14.0%	-135	-6.9%
Mississippi	47	80	70.2%	136	136	0.0%	33	18.0%
Missouri	712	758	6.5%	1,096	948	-13.5%	-102	-5.6%
Montana	797	1,085	36.1%	291	251	-13.7%	248	22.8%
Nebraska	362	416	14.9%	218	190	-12.8%	26	4.5%
Nevada	289	321	11.1%	270	324	20.0%	86	15.4%
New Hampshire	34	30	-11.8%	157	137	-12.7%	-24	-12.6%
New Jersey	52	55	5.8%	699	702	0.4%	6	0.8%
New Mexico	731	631	-13.7%	254	201	-20.9%	-153	-15.5%
North Carolina	639	688	7.7%	2,853	2,849	-0.1%	45	1.3%
North Dakota	653	614	-6.0%	95	107	12.6%	-27	-3.6%
Ohio	146	160	9.6%	780	674	-13.6%	-92	-9.9%
Oklahoma	8,986	13,005	44.7%	967	832	-14.0%	3,884	39.0%
Oregon	646	884	36.8%	592	658	11.1%	304	24.6%
Pennsylvania	167	147	-12.0%	1,063	983	-7.5%	-100	-8.1%
South Carolina	171	236	38.0%	594	617	3.9%	88	11.5%
South Dakota	642	794	23.7%	105	93	-11.4%	140	18.7%
Tennessee	296	325	9.8%	739	742	0.4%	32	3.1%
Texas	2,824	2,964	5.0%	4,011	3,388	-15.5%	-483	-7.1%
Utah	809	851	5.2%	438	446	1.8%	50	4.0%
Virginia	278	330	18.7%	1,499	1,501	0.1%	54	3.0%
West Virginia	21	22	4.8%	99	96	-3.0%	-2	-1.7%
Wisconsin	1,053	1,009	-4.2%	503	492	-2.2%	-55	-3.5%
Wyoming	211	217	2.8%	116	106	-8.6%	-4	-1.2%
All States	27,158	32,778	20.7%	28,627	26,841	-6.2%	3,773	6.8%

¹ An enrolled Tribal member is an individual who meets the definition of Indian under the Affordable Care Act as a member of an Indian Tribe or shareholder in an Alaska Native regional or village corporation.

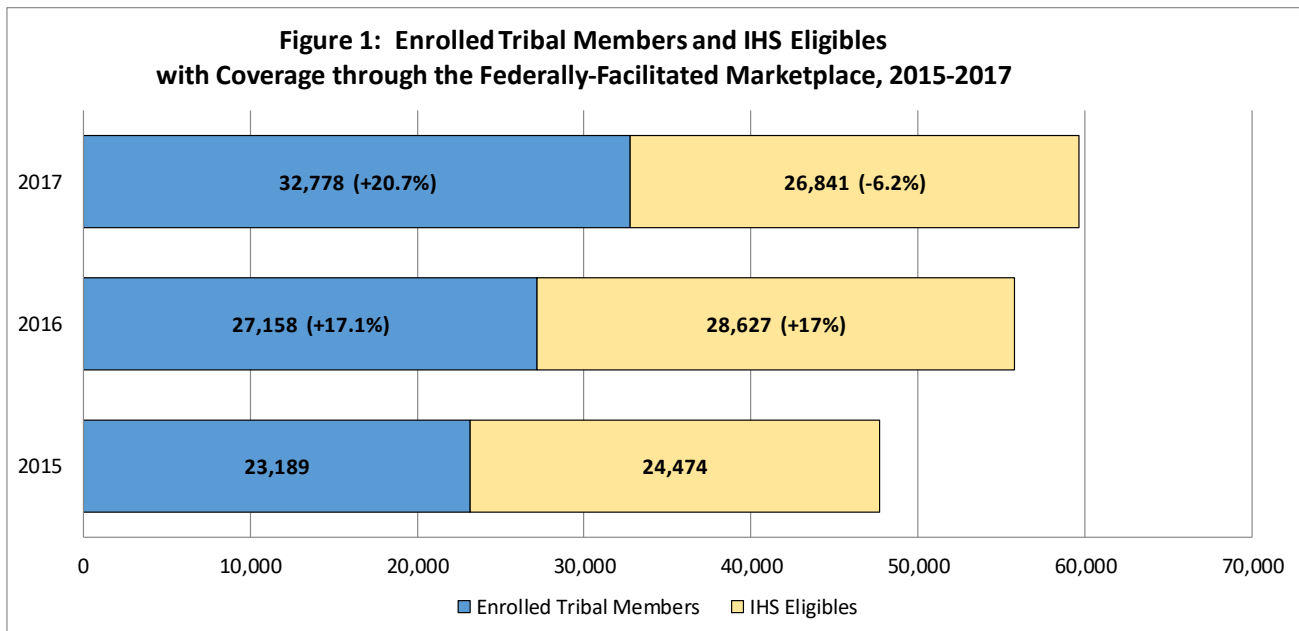
² Figures are for May 2016 and November 2017. Totals include values in suppressed cells.

³ The FFM includes State-Based Marketplaces on the Federal Platform and State-Partnership Marketplaces.

⁴ Enrolled Tribal members are eligible for comprehensive Indian-specific cost-sharing protections; "other IHS eligibles" are not.

⁵ Kentucky moved from a State-Based Marketplace to a State-Based Marketplace on the Federal Platform in late 2016.

Attachment B

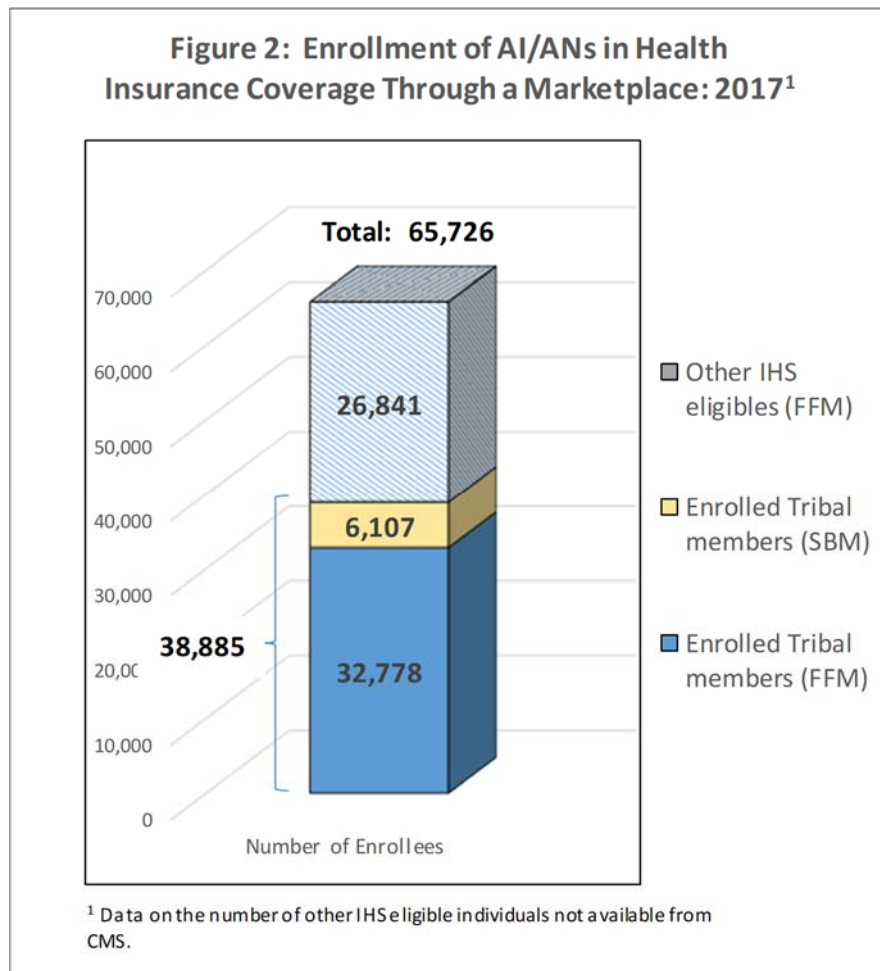


Attachment C

Table 2: Enrolled Tribal Members ¹ with Zero or Limited Cost-Sharing Reductions (CSRs) in State-Based Marketplaces, 2017 ² (Suppress Cells <=11)			
State	Tribal Members with Zero CSRs	Tribal Members with Limited CSRs	Totals
California	2,791	891	3,682
Colorado	319	101	420
Connecticut	75	11	86
District of Columbia	**	17	17
Idaho	308	49	357
Maryland	96	16	112
Massachusetts	188	71	260
Minnesota	176	38	214
New York	112	50	162
Rhode Island	17	0	17
Vermont	14	**	14
Washington	567	199	766
Totals	4,663	1,444	6,107

¹ An enrolled Tribal member is an individual who meets the definition of Indian under the Affordable Care Act as a member of an Indian Tribe or shareholder in an Alaska Native regional or village corporation.

² Figures are for September 2017.



Attachment D

Table 3: American Indians/Alaska Natives Receiving Zero and Limited Cost-Sharing Reductions (CSRs) for Enrolled Tribal Members¹ in the Federally-Facilitated Marketplace (as of December 2016) (Suppress Cells <=50)

State	Enrolled with AI/AN Zero or Limited CSR	Average Advanced CSR Payment (per month)	Average Advanced CSR Payment (annualized)
Alabama	358	\$178	\$2,139
Alaska	762	\$426	\$5,118
Arizona	1,073	\$132	\$1,583
Arkansas	499	\$150	\$1,802
Delaware	**	\$196	\$2,355
Florida	992	\$178	\$2,138
Georgia	326	\$159	\$1,910
Hawaii	**	\$125	\$1,498
Illinois	334	\$152	\$1,819
Indiana	163	\$182	\$2,185
Iowa	77	\$183	\$2,192
Kansas	840	\$139	\$1,672
Louisiana	266	\$203	\$2,431
Maine	199	\$170	\$2,046
Michigan	1,009	\$175	\$2,101
Mississippi	62	\$147	\$1,767
Missouri	770	\$177	\$2,129
Montana	1,013	\$192	\$2,310
Nebraska	393	\$181	\$2,167
Nevada	370	\$199	\$2,391
New Hampshire	**	\$129	\$1,553
New Jersey	52	\$158	\$1,891
New Mexico	903	\$129	\$1,551
North Carolina	665	\$217	\$2,603
North Dakota	984	\$146	\$1,747
Ohio	122	\$161	\$1,927
Oklahoma	9,319	\$146	\$1,747
Oregon	683	\$163	\$1,951
Pennsylvania	168	\$132	\$1,579
South Carolina	216	\$184	\$2,207
South Dakota	755	\$186	\$2,228
Tennessee	309	\$156	\$1,875
Texas	3,125	\$150	\$1,799
Utah	845	\$120	\$1,443
Virginia	297	\$145	\$1,740
West Virginia	**	\$193	\$2,310
Wisconsin	1,134	\$217	\$2,607
Wyoming	191	\$248	\$2,981
Total (including suppressed)/average:	29,360	\$166	\$1,988

Adjusted Enrolled (including Enrolled but not receiving 02/03 CSRs) in FFM coverage: 31,901
 Other IHS beneficiaries (non-Enrolled) in FFM coverage: 28,553
Total Enrolled and IHS beneficiaries in FFM coverage (December 2016): 60,454

¹ "Enrolled" Tribal member is an individual who meets the definition of Indian under the Affordable Care Act as a member of an Indian tribe or shareholder in an Alaska Native regional or village corporation.

Attachment E

Table 4: American Indian and Alaska Native Applicants and Enrollees (Active) *Active Plan Selections Only*

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Coverage Year 2017; Data as

Best AI/AN Category	Tribal Member			AI/AN Indicator			Race AI/AN Member		
	No AIAN Enrollments on Application	At Least 1 AIAN Enrollment Detected but Not All	All AIAN Members Enrolled on Application	No AIAN Enrollments on Application	At Least 1 AIAN Enrollment Detected but Not All	All AIAN Members Enrolled on Application	No AIAN Enrollments on Application	At Least 1 AIAN Enrollment Detected but Not All	All AIAN Members Enrolled on Application
Applications Submitted to the Marketplace									
Total Applications	5,279	1,260	33,074	43,128	2,642	39,190	6,924	179	8,050
Individuals	6,558	1,932	42,484	56,008	6,150	46,777	7,775	458	8,872
Determinations made by Marketplace									
Individuals	5,813	1,454	41,571	27,715	2,002	45,223	4,816	201	8,610
Individuals determined	195	*	681	22,642	678	19,536	3,737	57	3,413
Individuals	5,618	1,447	40,890	5,073	1,324	25,687	1,079	144	5,197
Individuals	566	452	828	23,962	3,922	1,063	2,488	238	170
Individuals	179	27	110	4,331	226	524	471	19	96
Plan Selections	0	1,478	42,484	0	1,953	46,777	0	189	8,872
Qualified Health Plan Selections (Active Only)									
Total Plan Selections	0	1,033	31,745	0	845	25,996	0	88	4,902
% Of Submitted	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
By SEP code									
As specific SEPs	0	196	5,540	0	*	50	0	*	*
All other SEPs	0	174	6,307	0	207	6,044	0	33	1,400
By Gender									
Female	0	596	17,862	0	488	14,493	0	56	2,657
Male	0	437	13,883	0	357	11,503	0	32	2,245
By Age Group									
0-17	0	55	5,579	0	38	3,598	0	*	434
18-34	0	390	8,788	0	297	7,501	0	33	1,441
35-64	0	588	17,299	0	510	14,853	0	53	3,012
65+	0	0	79	0	0	44	0	0	15
By Metal Level									
Catastrophic	0	*	122	0	*	213	0	0	41
Bronze	0	818	24,536	0	114	5,096	0	15	935
Silver	0	197	6,447	0	724	19,447	0	72	3,764
Gold	0	17	615	0	*	1,141	0	*	150
Platinum	0	0	25	0	*	99	0	0	12
By Cost Sharing Reduction (CSR) Type									
01: No CSR	0	49	2,770	0	179	10,610	0	18	1,900
for	0	873	23,980	0	*	*	0	0	*
03: Other CSR	0	36	3,324	0	*	*	0	0	0
04 - 06:	0	75	1,671	0	663	15,375	0	70	3,001

Attachment E, Table 4 (continued)

Page 2 of 2	Tribal Member			AI/AN Indicator		
	No AIAN Enrollments on Application	At Least 1 AIAN Enrollment Detected but Not All	All AIAN Members Enrolled on Application	No AIAN Enrollments on Application	At Least 1 AIAN Enrollment Detected but Not All	All AIAN Members Enrolled on Application
Sub-Category						
<i>By State</i>						
AK	0	23	656	0	0	122
AL	0	20	631	0	72	1,144
AR	0	11	531	0	12	285
AZ	0	28	803	0	*	615
DE	0	0	24	0	*	93
FL	0	24	1,057	0	82	2,774
GA	0	*	327	0	50	1,392
HI	0	*	51	0	*	121
IA	0	*	94	0	*	108
IL	0	*	303	0	20	791
IN	0	*	160	0	*	428
KS	0	31	804	0	19	449
KY	0	*	69	0	*	161
LA	0	*	226	0	12	450
ME	0	*	188	0	*	259
MI	0	20	991	0	16	801
MO	0	29	729	0	41	907
MS	0	*	80	0	*	136
MT	0	67	1,018	0	*	251
NC	0	*	688	0	104	2,745
ND	0	12	602	0	*	107
NE	0	17	399	0	*	190
NH	0	0	30	0	*	137
NJ	0	*	55	0	*	702
NM	0	20	611	0	*	201
NV	0	*	321	0	*	324
OH	0	*	160	0	*	674
OK	0	399	12,606	0	39	793
OR	0	33	851	0	20	638
PA	0	*	147	0	26	957
SC	0	*	236	0	20	597
SD	0	48	746	0	*	93
TN	0	15	310	0	31	711
TX	0	90	2,874	0	140	3,248
UT	0	28	823	0	16	430
VA	0	*	330	0	33	1,468
WI	0	23	986	0	*	492
WV	0	*	22	0	0	96
WY	0	11	206	0	*	106