

MVP FASTFAX

News for Providers

Advanced Premium Tax Credit (APTC) Member Delinquency Update

*****Please note revised effective date*****

Effective **April 1, 2016**, MVP will begin implementing the federal Affordable Care Act (ACA) premium delinquency guidelines for APTC (subsidized) members. Due to its system limitations MVP did not previously implement these ACA guidelines and was unable to notify providers of premium delinquency. Therefore, MVP has been paying claims for any such delinquent APTC members, rather than pending them. Please note that there will be no adjustments related to retro terminations for non-payment applied to paid claims during the period when the ACA guidelines were effective through January 31, 2016.

Some important things to note regarding delinquent APTC (subsidized) members per the ACA guidelines:

- ACA guidelines dictate that members may be delinquent with their premiums for 3 months and still be considered eligible. Members will show as eligible online if they are delinquent for up to 3 months. Their claims will continue to be paid during the first month of delinquency, but then pending during the second and third months, if delinquency continues. Payments for the initial month will not be retracted if the member is terminated after the 3 month grace period.
- APTC members will remain eligible for up to 3 months of non-payment at which time they will become ineligible. MVP will put claims in a pend status after the initial month of delinquency until the end of the third month. This period of time is longer than prompt pay laws and most of MVP's contracts allow for; however, federal ACA law supersedes contractual agreements and prompt pay laws, so prompt pay interest will not be applied.
- If the member does not pay the premium by the 3 month mark, claims will be denied as "member not eligible," at which time you may bill the member directly for the service. Per federal ACA guidelines, MVP will notify providers via letter if they submit a paper claim on behalf of a delinquent member. For EDI claim transactions, the delinquency message will be in the return file.

Please note that claim status can be checked any time through the *Claim Search* in the provider portal of the MVP website (www.mvphealthcare.com), which would indicate the claim pend status.

You can check a member's eligibility online as you do today. Marketplace members will show as eligible if they paid their premiums. APTC members who are in arrears after one month of non-payment will still show as eligible on the provider portal of the MVP website (www.mvphealthcare.com) with the following message "*Premium payment past due. Claims may be pending.*" After three months of non-payment, the subsidized member will show as ineligible on MVP's website, and their coverage will be terminated.

If you have any questions with respect to this notice, please contact your Professional Relations Representative.

