



ACA Learning Series

Massachusetts Health Care Training Forum (MTF)

**Understanding Special Enrollment Period Policies and
How to Help Consumers Continue to Access Health Coverage**

February 11, 2015

Agenda

- Overview of Closed Enrollment
- System Logic for Special Enrollment Period
- Updates to the Online and Paper Applications
- Changes to Notices

Overview



- Open enrollment is the time of the year where everyone can choose and enroll in a health plan
- Closed enrollment means that someone must experience a qualifying life event to be able to choose a health plan or change their health plan
 - MassHealth is not subject to closed enrollment. Individuals can apply for and enroll in MassHealth at any time
 - Dental enrollment never closes
- The window to enroll after a qualifying event is **60 days** and is called a special enrollment period (SEP)
- The online system will help determine whether someone qualifies for an SEP
 - In some cases, they may have to send in proof of the qualifying event within 90 days of their determination
- If someone fails to verify their qualifying event, they will be terminated prospectively (ex. on the 1st day of the month following the end of the 90 days)

Enrollment Opportunities



Anyone can apply for health benefits at any time during the year, but special rules apply to when people can enroll in coverage

Open Enrollment:

- During the Open Enrollment period, anyone who qualifies to use the Marketplace can fill out an application and enroll in health or dental insurance
- The 2015 Open Enrollment period started November 15, 2014 and ends February 15, 2015

Closed Enrollment:

- During Closed Enrollment, individuals can fill out an application for health or dental insurance but may not be able to ENROLL in a new or different qualified health plan
- Closed Enrollment begins on February 16, 2015
- In certain situations – like getting married or qualifying for ConnectorCare – individuals may qualify for a **Special Enrollment Period (SEP)**
 - As a reminder, individuals qualifying for MassHealth can apply and enroll anytime during the year

Special Enrollment Periods

- If an individual qualifies for a SEP, they can enroll in or change health insurance outside the annual Open Enrollment period
 - New members can sign up
 - Existing members can add or remove members from their plan or change plans altogether
- Certain life changes, like getting married, having a baby, or losing job-based health insurance are changes that would allow a person to qualify for a SEP
- Changes that allow an individual to qualify for a SEP are called **Qualifying Life Events**.
- SEP will give someone 60 days from the date of the qualifying event to select a new plan
 - Individuals may pay after the 60 day window, but they must “check out” in the shopping process within 60 days—a plan in their shopping cart is not enough

Qualifying Life Events

- Gains a dependent or becomes a dependent as a result of:
 - Marriage;
 - Birth, adoption or placement for adoption or foster care or court-ordered care of a child
- Loses minimum essential coverage (MEC) for a reason other than failure to pay premiums or fraud
- Moves to Massachusetts or gains access to new plans as a result of a permanent move
- Is an American Indian or Alaska Native
- Becomes a Lawfully Present individual
- Is determined newly eligible for ConnectorCare
- Is enrolled in Health Connector coverage and
 - Becomes newly eligible for Premium Tax Credits; or
 - Experiences a change in cost sharing reductions
- Administrative reasons:
 - Start or end of a ConnectorCare premium waiver
 - Exceptional circumstances
 - Waiver from the Office of Patient Protection
 - Erroneously enrolled or not enrolled

NOTE: A new applicant who applies during closed enrollment and is determined eligible for tax credits does NOT qualify for an SEP as a result.

A member already enrolled in a QHP who has a change in eligibility for tax credits can switch plans as a result

Member Transition

Any individuals transitioning from CommCare or MassHealth will qualify for SEP in one of two ways

ConnectorCare or MassHealth eligibility

- Being newly eligible for ConnectorCare is a qualifying event
- MassHealth does not have closed enrollment

Loss of MEC qualifying event

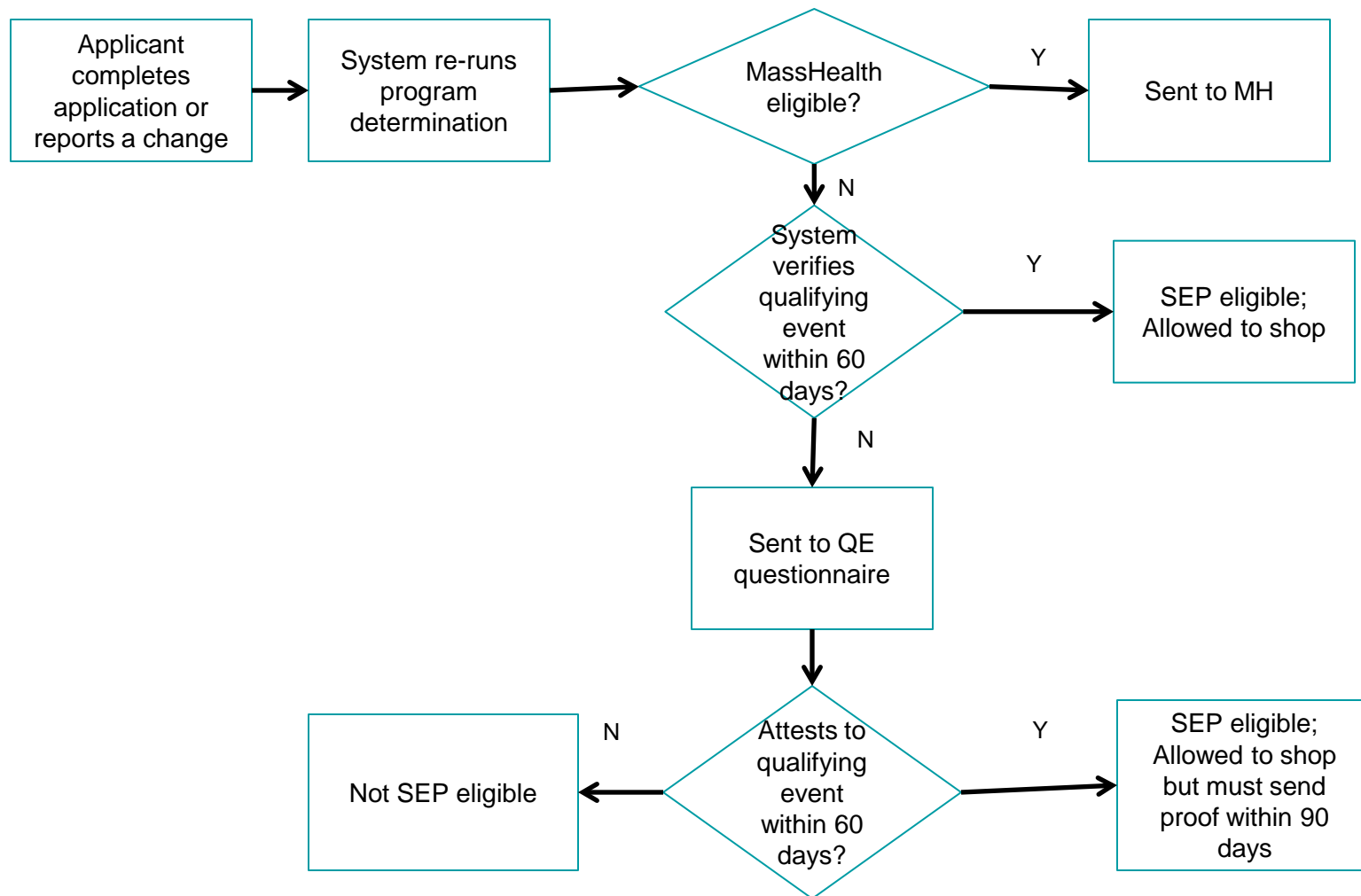
- hCentive will not automatically recognize prior coverage provided through another system (MA-21 or HIX), so members will be asked to submit proof of the loss of coverage
 - We are working to minimize the burden on members by exploring any system reports that will allow us to identify and verify loss of MEC
- If someone loses a type of MassHealth benefit that is not considered MEC based on future federal guidance, we will allow an SEP through a forthcoming Administrative Bulletin which will be posted to the Policy Center on MAhealthconnector.org
 - They should answer that they lost MEC in the SEP questionnaire

ConnectorCare does not have rolling enrollment like CommCare

- Becoming newly eligible for ConnectorCare gives consumers 60 days to enroll from the date of the eligibility determination
- The new system will look at any existing eligibility to determine if consumer is newly eligible
 - Example: Mary applies on 2/1 and is determined ConnectorCare eligible but doesn't enroll. In May, she comes back to shop. She will not be allowed to shop unless she has a qualifying event
 - If Mary reports a change to her application that results in a slight change in her income but doesn't change her ConnectorCare Plan Type, she still cannot shop unless she has another qualifying event
 - If Mary reports a change that results in a change to her ConnectorCare Plan Type, she can shop because Plan Type changes are another category of qualifying event

System Logic for Special Enrollment Period

Applicant Experience Overview



Special Enrollment Period: Logic



Marketplace will calculate 60 days from Qualifying Life Event

If the person indicates that a Qualifying Life Event occurred, the following logic will be applied:

- If Qualifying Life Event occurred within the past 60 days – Allow individual to enroll in coverage
- If Qualifying Life Event occurred more than 60 days in the past – Do NOT allow individual to enroll in coverage

If a person is eligible for SEP (Qualifying Life Event occurred in past 60 days), they will only have 60 days from the qualifying life event to enroll in health insurance coverage

If an individual enrolls in coverage within the 60 day period but fails to send in proof of their qualifying event, coverage will be terminated

Updates to the Online and Paper Applications

System Identification of Qualifying Life Event



During every eligibility determination outside of open enrollment, the system should identify if an applicant automatically meets a Qualifying Event and is eligible for a Special Enrollment Period.

The system will be able to automatically determine if a person meets a qualifying life event if the following reasons apply:

- Individual is newly eligible for ConnectorCare;
- Individual was previously eligible for a MassHealth benefit that meets Minimum Essential Coverage (MEC) within the marketplace. If determined outside (i.e. MA21 or HIX), they will be asked to submit proof of the loss of MassHealth coverage);
- At least one member in the eligibility household is APTC eligible and was enrolled in an unsubsidized Health Connector plan;
- At least one member in the eligibility household is eligible for a different plan type level and enrolled in an Health Connector plan; or
- At least one member in the eligibility household is an American Indian or Alaska Native

Note: Individuals eligible for MassHealth will be allowed to enroll at anytime during the year.

Applicant Experience: Verified SEP Eligibility



Household[1] - Application Result FPL : 239.93

This household also qualifies to receive a tax credit to help lower monthly health coverage costs.

For lowering health coverage costs the people below who qualify for premium assistance will receive a maximum Advance Premium Tax Credit in the amount of: \$ 38 ⁹⁶

NAME	PROGRAMS ELIGIBLE FOR	DOCUMENTS REQUIRED
Paige Pratt	ConnectorCare Plans (Advance Premium Tax Credit plus Massachusetts state subsidy) <i>i</i>	Proof of Residency Proof of Income Proof of U.S. Citizenship Status Proof of New address Proof of former address

Your household is eligible for Special Enrollment Period:



You can enroll in a new or different health insurance plan on or before 04/03/2015 .If you would like to enroll in new or different coverage, you must choose a plan and pay the first monthly premium before coverage can start.

Please note: Make sure you understand who can qualify as an eligible dependent in your tax household before you enroll in a health or dental family plan. A list of eligible dependents can be found in the Health Connector policy on [Dependent Eligibility\(NG-3A\)](#). If you buy a plan as a family and include people who do not qualify as a dependent, your insurance carrier could reject your enrollment and retroactively cancel your coverage.

Submission date = 02/02/2015

Note: language in the red box will still show after 60 days. Users will need to note the SEP end date to determine if they can still take action

Special Enrollment Period: Questionnaire



If the system does NOT automatically determine a household eligible for a Special Enrollment Period, a Questionnaire is displayed based on whether the household is submitting a new or modified application.

Marketplace will ask if any of the following apply:

- Did any of the following people in the household lose health coverage or expect to lose it?

Note: If an individual has received a renewal form from MassHealth and this questionnaire is displayed it means the system has determined that due to a change in their circumstances, they are no longer eligible. Applicants subject to MassHealth renewals should answer “YES” to this question and provide the date for loss of coverage as the date of application submission

- Did any of the following people gain a dependent or become a dependent?
- Did anyone in your household who was not previously a lawfully present immigrant become a lawfully present immigrant?
- Did anyone in your household recently move to Massachusetts, or will anyone move to Massachusetts soon?

Special Enrollment Period: Questionnaire (*cont'd*)



If the person checks YES to any of the Qualifying Life Events, they will be asked:

- WHO in the household experienced the change; and
- WHEN the change occurred (or will occur)

If the system recognizes that a person was removed from the household, a question is displayed online to determine the reason.

- The questionnaire will ask: “We noticed that you removed an individual from your household. Please tell us why.”
- Dropdown will provide reasons (i.e. divorce, death) and will ask for date of occurrence

Applicant Experience: SEP Questionnaire



Qualifying Life Events

Please select any of the below options to qualify for coverage outside Open Enrollment Period

Did any of the following people in the household lose health coverage or expect to lose it? *i* Yes No

Did any of the following people gain a dependent or become a dependent? *i* Yes No

Did anyone in your household who was not previously a lawfully present immigrant become lawfully present immigrant? *i* Yes No

Did anyone in your household recently move to Massachusetts, or will anyone move to Massachusetts soon? *i* Yes No

Save and Continue

Applicant Experience: SEP Questionnaire *cont'd*

Qualifying Life Events

Please select any of the below options to qualify for coverage outside Open Enrollment Period

Did any of the following people in the household lose health coverage or expect to lose it? [i](#)

Yes No

Who has lost health coverage in the household?

Paige Pratt

- Please enter the coverage end date?

MM/DD/YYYY

- Did Paige Pratt lose health insurance because of not paying premiums?

Yes No

- Did Paige Pratt choose to cancel coverage?

Yes No

Pete Pratt

Penelope Pratt

Applicant Experience: Proof of Qualifying Event Required



If the individual attests to a qualifying event in the 60 day window via the questionnaire, they will then see this screen indicating they may shop but must submit proof of their qualifying event

Household[1] - Application Result FPL : 308.48

This household also qualifies to receive a tax credit to help lower monthly health coverage costs.

For lowering health coverage costs the people below who qualify for premium assistance will receive a maximum Advance Premium Tax Credit in the amount of: \$ 0⁰⁰

NAME	PROGRAMS ELIGIBLE FOR	DOCUMENTS REQUIRED
Paige Pratt	Health Connector Plans with an Advance Premium Tax Credit <i>i</i>	Proof of Residency Proof of Income Proof of U.S. Citizenship Status Proof of New address Proof of former address

Your household is temporary eligible for Special Enrollment Period:

You can enroll in a new or different health insurance plan on or before 04/02/2015 . You must send us proof of Moved to MA no later than 05/03/2015 if not, your SEP enrollment may be cancelled. If you would like to enroll in new or different coverage, you must choose a plan and pay the first monthly premium before coverage can start.

Please note: Make sure you understand who can qualify as an eligible dependent in your tax household before you enroll in a health or dental family plan. A list of eligible dependents can be found in the Health Connector policy on [Dependent Eligibility\(NG-3A\)](#). If you buy a plan as a family and include people who do not qualify as a dependent, your insurance carrier could reject your enrollment and retroactively cancel your coverage.

Submission date = 02/02/2015

Paper Application Changes

Paper applications:

- Subsidized application (ACA-3) will include qualifying life event questionnaire as a supplement
- Unsubsidized application will include qualifying life event as a new section

Draft language excerpt:

You must complete the rest of this application along with this page. Don't submit the page by itself.

Answer the following questions if anyone on this application needs to get health insurance after the open enrollment period has ended. Certain life changes allow your coverage through the Health Connector to start right away.

These questions are optional. If you haven't had any recent changes in your life, you can leave the answers blank. You can enroll in MassHealth at any time of the year, even if you didn't experience life changes. If you are found newly eligible for a ConnectorCare plan through the Health Connector, you can also enroll at any time of the year. Members of federally-recognized tribes and Alaska Native shareholders can enroll in coverage through the Health Connector any time of the year.

Tell us about changes in your household.

1. Someone lost health coverage in the last 60 days, or expects to lose it in the next 60 days.

Names	Date coverage ended or will end (mm/dd/yyyy)
<input type="checkbox"/> check here if coverage ended because not paying premiums.	__/__/____
<input type="checkbox"/> check here if coverage ended because you chose to cancel coverage.	

2. Someone gained a household member due to marriage in the last 60 days.

Names	Date of marriage (mm/dd/yyyy)
	__/__/____

Changes to Notices

Special Enrollment Period: Notices



Notices will be changed and added as part of Special Enrollment Period

Eligibility Approval:

- Added Special Enrollment Period language:
 - “You can shop during a Special Enrollment Period”
 - Will be displayed for individuals who qualify to enroll in health coverage during closed enrollment. Clarifies that they only have 60 days from the Qualifying Event claimed on the application to enroll in new/different coverage;
 - “You do not qualify for a special enrollment period”
 - Will be displayed for individuals who are eligible but do not qualify to enroll in health coverage during closed enrollment. Explains that the individual can apply for a waiver through the Office of Patient Protection and that they are still eligible to purchase Dental Insurance

Special Enrollment Period: Notices

cont'd



NEW Enrollment Request for Information:

- Generated for households that must submit proof in order to enroll for health coverage during closed enrollment
- If an individual was sent an eligibility Request for Information, the letter will inform them that they must send all documents to the right place to keep coverage.
- Proof of Enrollment document should be sent to the Health Connector:
 - **Mail:** 133 Portland Street, 1st Floor Boston, MA 02114-1707
 - **Fax:** to 617-887-8745
 - Please note that the location is different than one used for ELIGIBILITY verifications.
- This notice is separate from the Request for Information sent to obtain verification of eligibility for benefits, so members may get two request letters
 - If a verification is required for both eligibility and enrollment (e.g., proof of American Indian status), it will be requested on the eligibility version of the letter

Failure to Submit

Individuals who fail to send proof of the attested Qualifying Life Event will be terminated

- Household will be given 90 days to submit proof of a Qualifying Life Event
- If a household fails to submit proof and is enrolled in a QHP, they will be disenrolled from the QHP
- Disenrollment will occur prospectively
- Eligibility for Health Connector plans will not be impacted
- MassHealth benefits and dental insurance coverage will not be impacted by failure to submit proof of Qualifying Event

Key Takeaways

Please keep this information in mind as you work with consumers to help them apply for health insurance coverage:

- These closed enrollment rules **do not** apply to those consumers who are seeking immediate health coverage through such programs or services as MassHealth, the Health Safety Net or the Children's Medical Security Program
- The ConnectorCare program does not have rolling enrollment like Commonwealth Care. Becoming newly eligible for ConnectorCare gives the consumer **60 days** to enroll and the system will look at any existing eligibility to determine if someone is **newly** eligible



Questions?