

# Review of Federally-Facilitated Marketplace Special Enrollment Periods and Plan Category Limitations CBT Transcript

Slide	Text
1.1	Good afternoon and welcome to a review of Federally-Facilitated Marketplace Special Enrollment Periods and Plan Category Limitations.
1.2	<p>Before we begin, please note the following keyboard commands are available to use throughout the CBT.</p> <p>“P” to pause the CBT,  “R” to resume the CBT,  “K” to review the keyboard shortcuts shown on this screen,  “O” to move back to the previous slide,  “N” to move to the next slide, and  “M” to mute or turn off the audio.</p> <p>Please note selecting M will only turn the audio off on current slide. Audio will resume upon replaying the current slide or progressing to the next slide. Please click the screen content to activate the keyboard shortcuts when visiting each section.</p>
1.3	<p>Today’s agenda includes: Special Enrollment Period Overview; A Plan Category Limitations Overview; Consumer Messaging on Plan Category Limitations; Examples; and Additional References.</p> <p>I’m now going to turn the call over to Carolyn Kraemer to begin the presentation. Carolyn? Hi, everyone. As the speaker just said, this call covers a review of something called Plan Category Limitations for Special Enrollment Periods in a Federally-facilitated Exchange.</p> <p>So this is a topic that we covered actually right before Open Enrollment as well. So, for some folks on this call, this will be a review, but please feel free to ask any questions that you might have in the chat feature and we will reply to them on this call if we can, and if we can’t, we will get back to you in writing after the call.</p> <p>So, as the other speaker just mentioned, this deck is going to cover an overview; just a quick overview of Special Enrollment Periods in general to put this particular subject into context and then we will talk just the policy of Plan Category Limitations, what it is and generally what it looks like for consumers who are enrolling in Marketplace Coverage through a Special Enrollment Period, and then we’ll go through some of the consumer messaging on Plan Category Limitations. In particular examples of eligibility, determination notice content that consumers will see when they actually go through this process, if Plan Category Limitations, when the occasions apply to them. Then finally, we’ll just go through examples of what the policy will look like to help further put it into context and give both the sense of what helping consumers with this might look like, and then at the end of the deck, as we often do, there are some additional references that folks can use in the future along with this deck just to learn more about this topic and prepare to help consumers who might be affected by it.</p>
1.4	So, this slide that we’re on right now is something that a lot of folks likely have seen before if you have ever been to another Agent/Broker webinar on the Special

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	<p>Enrollment Periods in general, which again, as a lot of folks are already familiar with, Special Enrollment Periods allow consumers who qualify to enroll in their Exchange coverage outside of the annual Open Enrollment Period, and this slide just further breaks down general qualifying event categories. There is a list of six of them right there.</p> <p>It's important to remember that these categories aren't actually the SEP triggering events, but rather different categories that triggering events fall into, and for more information on an actual triggering event that might qualify someone for a Special Enrollment period, such as a loss of coverage that they had through their job or getting married or like permanently moving their residence, you can click on the Fact Sheet below that it's linked to here called 'Understanding SEPs', and that provides you with more information on, you know, what it looks like for a consumer to qualify for a Special Enrollment Period, as does the SEP Overview that we also linked to and there is a slide deck like this one that provides even more detail on Special Enrollment Periods, Qualifying events, when consumer's coverage can start based on their Qualifying event and when they picked their plan, and so forth.</p> <p>And then, the last point that I'll make related to this slide is that a consumer Special Enrollment period eligibility in addition to that qualifying event might also depend on whether or not they had prior coverage and they might have to submit documents in some cases if they are newly enrolling in Marketplace coverage to confirm that they actually qualify for the Special Enrollment Period. So, these are good general things to keep in mind about Special Enrollment Periods. So, with that, I'll go to the next slide.</p>
1.5	<p>Great. So, as we talked about on the last slide, some consumers who are newly enrolling in coverage may need to submit documents to confirm that they qualify for their Special Enrollment Period. So, for example, if I lose coverage through a job, then I might need to; if I'm newly enrolling in coverage, I need to submit paperwork that indicates, that just confirms that I lost that coverage. That applies to consumers generally who are newly enrolling in coverage.</p> <p>Plan Category Limitations generally apply to consumers who already have Marketplace coverage, and we'll get into that and what it looks like a bit more on the next upcoming slides, but here is just an overview that again would be a review for a lot of folks of what a Plan Category is, and this is something that you can learn a lot more about on HealthCare.gov if you are interested.</p> <p>This slide just explains that a Plan Category refers to what is also referred to as metal levels, which are Bronze, Silver, Gold and Platinum, and these metal levels refer to not the quality of the coverage or even the kinds of benefits that it covers, but rather the percentage of consumer out-of-pocket costs versus what the plan reimburses. So, like the slide explains, Bronze plans tend to have lower premiums, but higher out-of-pocket costs, whereas on the opposite end of the spectrum, Platinum plans</p>

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	<p>tend to have higher premiums, but lower out-of-pocket costs, and so, Silver and Gold plans are just along that spectrum.</p> <p>This slides also briefly addresses catastrophic plans which do not fall into a metal level but are another type of coverage that some consumers may be eligible for based on their age and potentially other factors and that's something else that you can learn more about on HealthCare.gov.</p> <p>So, given that context, can we please move to the next slide?</p>
1.6	<p>So, this slide starts to get into the policy that we are covering today, which is Plan Category Limitations.</p> <p>So, Plan Category Limitations, just on a very basic level refers to limitations that apply to consumers who are already in coverage and qualify for a Special Enrollment Period that may allow them to change their plan. Those consumers beginning soon, beginning actually in early February, February 1st, is our Go Live date. These consumers will be limited in their plan selection based on Plan Category, and that's the Bronze, Silver and Gold and Platinum type plans that we talked about a moment ago.</p> <p>So, this slide really just gets at the basics of Plan Category Limitations in terms of who it applies to. These are folks who currently have a Marketplace plan. They have a Special Enrollment Period and they want to change their plan.</p> <p>So, for example, if somebody is already enrolled in a plan through the Marketplace and gets married, then that person, if they have a Bronze plan will be limited in terms of based on their current Plan Category and won't be able through that marriage SEPs since they already have coverage to switch to a Gold plan or a Platinum plan.</p> <p>And then in this slide, if folks are interested in reading back on this, this also provides a link to a rule in which this policy was established.</p>
1.7	<p>Great. This just gets into a little more depth in terms of who is subject to Plan Category Limitations. So, as mentioned previously, this covers folks who are already enrolled in coverage and it also impacts people who are newly enrolling in coverage with a family member who is already enrolled. So, it impacts the newly enrolling consumers in the sense that if they want to enroll in the same plan with a currently enrolled family member, then they generally need to enroll with that currently enrolled family member.</p> <p>So, in the marriage example that I just talked about, if a couple gets married and the first spouse is already enrolled say in a Bronze plan, that incoming spouse can choose a plan at any metal level that she wants. She could enroll in say a Platinum plan if she wanted to, but if they want to enroll in coverage together in the same plan, then the new spouse would need to be added to the Bronze plan generally.</p>

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	<p>In terms of which Special Enrollment Periods are subject to Plan Category Limitations, this really covers most common SEP types.</p> <p>So, really the majority of Special Enrollment Periods that you are likely to help consumers with will be affected by this policy and by these limitations.</p> <p>So, for example, a loss of qualifying coverage or a SEP consumer moves, or generally has a change in household size like getting married or having a baby or adopting a new child, and then generally as I just explained through the example, people who are already enrolled in coverage and get an SEP will generally be able to choose from plans within their same metal level. So, if somebody is already enrolled in a Bronze plan, for example, and qualifies for a Special Enrollment Period, like they moved, they will only be able to choose from Bronze plans and importantly as mentioned on this slide, when they actually go in and apply for coverage and then move on to selecting plans, they will only be able to view Bronze plans. So, this is not something that you or a consumer will need to figure out yourselves. They will only be able to view on their account, the plans that are actually available to them. Next slide please.</p>
1.8	<p>This slide just gets into a little bit more depth in terms of questions that you might have about specific situations for consumers who are already enrolled in coverage and then they are potentially newly enrolling dependents.</p> <p>So, for example, the first question addresses a situation where somebody is already enrolled in Marketplace coverage, but say they become newly eligible for Cost-Sharing Reductions, which as a lot of folks already know, you can generally only use if it is income-based Cost-Sharing Reductions. You can only use those if you are enrolled in a Silver plan. So, in that example I've been talking about, somebody who is already enrolled in a Bronze plan, but has an income change and becomes newly eligible for Cost-Sharing Reductions, can actually change to a Silver plan. In that case, the person can either choose a new Bronze plan if they qualify for a Special Enrollment or they can switch to a Silver plan so that they can take advantage of the CSRs that they newly qualify for.</p> <p>This next question covers existing enrollees who don't themselves qualify for a Special Enrollment Period, but who gain a Special Enrollment Period eligible dependent due to a qualifying event, and so, this explanation really just gets at what we discussed before.</p> <p>For example, if somebody, lets say a mom is enrolled in a Silver plan and her young adult dependent newly moves and moves in with her and they want to; she wants to enroll her son in coverage, then she would have to stay in her own plan and could add her son, or he could enroll in a plan of any metal level if they want to enroll on the same application.</p>

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	<p>Now the third example is important because it gets to the question of what happens if let's say a plan's business rules are such that an existing enrollee cannot add a newly enrolling household member to their current plan, and so, in that previous scenario, if the son moves home and he is a young adult dependent under 26 and they want to enroll in coverage together, but for some reason his mom's plan's, current plan's business rules just don't permit him to enroll, then they could change to a different plan together in the same category that she currently has, and then if no plans are available in this category; let's say there are no other Silver plans that can accommodate them both, then that are available to them in their Service Area, then a family can enroll together in a plan with a category that is one level up or one level down. So, in that case, a Bronze or a Gold plan, and that's just to make sure that folks can enroll together if they need to and they otherwise couldn't because of their plan's business rules.</p>
1.9	<p>This slides just gets its SEPs that are not subject to Plan Category Limitations, and so like I said before, these Special Enrollment Periods are not very common, and most of the Special Enrollment Periods that you'll be helping consumers with actually do have Plan Category Limitations applying, and then the Special Enrollment Periods to which Plan Category Limitations still apply tend to be much rarer or applied to specific people.</p> <p>So, for example, a Special Enrollment Period available to American Indians or Alaska Natives is not subject to Plan Category and Limitations or other Special Enrollment Periods due to for example, an error of the Exchange, which in a lot of cases consumers are notified about if they qualify is not subject to Plan Category Limitations.</p> <p>As we also mentioned; as I also talked about before, consumers who are newly enrolling in Marketplace coverage aren't limited in terms of the plan they can choose based on the Plan Category, but it's likely they will need to submit documents to confirm their eligibility, and this slides just provides some links if folks want to learn more about that in terms of what kind of notices people will get if they are in that situation, the documents they need to submit and so forth. But, it is an either/or situation if somebody is not subject; excuse me, if somebody is subject to Plan Category Limitations, they will not need to submit documents, and vice versa. Next slide, please.</p>
1.10	<p>This slide provides another resource. This is the link to HealthCare.gov content on Plan Category limitations, in case folks want to learn more about how this will affect consumers, and then there also will be information about these, this policy in consumer's eligibility notice. And so, in addition to only seeing the plans from which they can select, once they go to Plan Compare in their HealthCare.gov account, there will also just be information in the eligibility notice that they get once they actually complete their application process, and the next couple of slides are going to illustrate some examples of this. So, next slide, please.</p>
1.11	<p>Great, and so to me, this appears a bit blurry, but I think folks should be able to see it better once they have the slides, but just to provide an overview, this example has to</p>

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	do with somebody who currently enrolled in coverage, and has a baby, and she adds her new child to her application, based on a SEP due to a birth, and wants to enroll him in coverage. So, the mother is limited to her current plan, and can select any plan for her new child, or she could enroll her new child in her plan along, along with her, just in her same plan, and so you can see what this looks like in terms of the eligibility notice. There are messages specific to the mother, Susan Griffith in this example, and then there, there's a message specific to her son, which is the, any plan is available to him, and for the mother, she is, will stay in her current coverage. Next slide, please.
1.12	This next slide illustrates an example that I also talked about earlier, in, in which somebody qualifies for a Special Enrollment Period, and that person is also, excuse me, based on becoming newly-eligible for Cost-sharing Reductions, and in order to actually use those Cost-sharing Reductions, that person, oh excuse me, I'm talking about the... pardon me. We'll get to that example later though. This slide is actually more related to the, the previous one, in which a current consumer moves to a different country, or county, excuse me, within her state, and qualifies for a move Special Enrollment Period. And then, she's also adding her, her son newly to her application based on that move, or move that he had, and she's limited to her current category, but her son, just like in the previous example, the newborn, because the son is being newly added, may choose his own plan, or he could enroll in coverage with her. Next slide, please.
1.13	And this is the slide that talks about a consumer who newly qualifies for Cost-sharing Reduction. So, as I got started explaining before, this consumer is currently enrolled in coverage, but she reports a change in income, and as a result of that change in income, she qualifies for a Special Enrollment Period because she is newly eligible for Cost-sharing Reduction, and so, because in order to actually take advantage of this Cost-sharing Reduction, she would need to have a silver level plan, she is able to change to a silver level plan if she wishes to do so, or she can choose a plan from her current category bronze if she prefers to stay in a bronze plan, instead of taking advantage of those CSRs that she can enroll in, in that silver plan if she chooses to do so. Next slide, please.
1.14	This next series of slides just gets us some examples of just back pattern family situations that would be affected by Plan Category Limitations, so that you could better understand how, how this situation would play out, and this situation involves a family that enrolled together, and then they moved from one county to another, and it talks about coverage, coverage date, and when coverage could be effective and so forth so folks can read about that for reference, that the, a key takeaway from this slide is that the family can either stay in their current plan if it's still available after their move, or they can change to another plan in the same category as their current plan, so they could change to another Gold plan if they wish to do so. Next slide, please.
1.15	In this example, a family is already enrolled together in a bronze plan, and then the parents bring a new dependent in late June, they adopt a new child, and so, this family, as we talked about before, has a choice. Any, any plan is available to the new dependent who's newly enrolling in coverage, and so they could also add in if they

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	wanted to enroll in coverage together, they could also add them to their current plan, which is bronze. And so, in this example, this family opts to update their application on June 30, and they, they enroll their new child on July 3, and in a platinum plan separately, and that coverage starts retroactively based on the new child's date of adoption. Next slide, please.
1.16	This slide covers a marriage situation, which we also talked about a little bit before, it covers a couple, one of whom is currently enrolled in coverage through a silver plan and gets married on April 17. Later that month, she updates her application to add her new spouse, and reports the date of the marriage, and because she's already enrolled, she cannot change her current plan. She needs to stay in that silver plan, and so she can either enroll her new spouse with her in that plan, or she can group him separately, and then he can choose from a plan in any category, and so the result, they decide to enroll together in Tanya's existing silver plan, and their coverage starts on May 1. And a quick note at this point, about how it would work in the previous example or in any example when an existing group of enrollees, or an existing enrollee wants to put a new dependent, or newly-enrolling family member in their own plan at any metal level. In order to help somebody do this, you actually need to adjust the enrollment groupings when the, when the consumer gets started on the Plan Compare process, and put the new dependent into their own enrollment group if they're not in, in their own group already, and then that way, when the consumer goes through Plan Compare, currently enrolled consumers will be able to see the plan available to them, while when they proceed to Plan Compare for the new dependent, they'll be able to see any plans without that metal limitation. So, that's an important sort of operational detail to be aware of in terms of helping consumers again, who do want to put their new dependent in a separate plan in order to choose from any plan category. Next slide, please.
1.17	All right. So, this example gets a little bit more complicated, where there are already enrollees in separate enrollment groups and members of the family are enrolled in plan categories in their own enrollment groups that are of different metal levels, and a key detail in this example is that well, the three children are enrolled in different plans. The plans that the children are enrolled in are all silver level plans, and so you can see that that, that that's the case for, for plan category limitation purposes. So, in this situation, the family moves from one county in Virginia to another and qualifies for a Special Enrollment Period based on that move, and the family members in this case can each select from any plan within their current categories, and so in this case, the parents are enrolled together in a gold plan. You can choose from a gold plan, or keep their current coverage if they're still available, and the children, as this example illustrates, can be enrolled together in a silver plan, because silver was all of their previous level of coverage, even though they were enrolled in different plans previously in that silver category. Next slide, please.
1.18	Now, this slide looks quite a bit longer, but it just illustrates the example that I talked about before briefly, where somebody has a new dependent, and they want to enroll their new dependent in their same plan, because they want to enroll in coverage together, but they're not able to do so, because the plan rules don't allow for it. And so, this coverage is a situation where a young adult dependent is enrolling

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	<p>with an existing family member, and want, they all want to enroll in coverage together. And so, in this case, because they can't, they, the existing enrollees and their new dependent can move to a different plan in their current plan category of silver. So, in other words, without, if they had been able to add their new dependent to their current plan, based on that new dependent Special Enrollment Period, then this couple would have, and their new dependent would have needed to stick with the current plan that they were already in. However, because the plan business rules do not allow for this, they can choose a different plan in their same category just in order to all be in coverage together. And as we talked about before, if this had been this, if there weren't a silver plan available to them, that would allow them to all enroll together, then they could have picked from either one metal level lower, or one metal level higher, just in order to enroll together. So, just in, in cases where the silver level plan which they could enroll together was not available for some reason. Next slide, please.</p>
1.19	<p>And this slide actually just gets at that example. So, the same scenario as the previous slide. They all want to enroll together, and their plan's business rules don't allow it. The, the plan's business rules for the coverage, the parents already have, and there's, there is no other plans of that same silver metal level available to them in their area, in which the family can all enroll together. In that case, the family can choose a plan that's one metal level up or down from their current coverage.</p>
1.20	<p>This slide covers another example, where a couple adopts a new child, and they end up wanting to enroll him in his own plan, and so they are able to do so, and this slide is, is really to showcase how consumers would do that, so that it, so that folks on this call can be aware of how to help consumers understand this if they do want to enroll their dependent in, in his or her own plan. And so, in the application, prior to actually comparing plans, they move their new dependent to his own enrollment group, and because they moved into his own enrollment group, they'll be able to see all of the plans available to him, and actually just you know, stick with their own coverage as they're required to do, and as will be reflected when they go through Plan Compare, and then choose a new plan of any category. In this case, they choose platinum for their new dependent.</p>
1.21	<p>This slide just covers some additional resources, along with those previously-listed in the deck, that folks can use if they want to just learn more, and have as a reference in order to help consumers who might be affected again, as of February 1st, by Plan Category Limitations, and just one more time for review, this, this new policy will apply to, this new policy will apply to folks who are already enrolled in Marketplace coverage, or, or excuse me, and new, new dependents or new family members being added to applications of folks that are newly enrolled in coverage, and it looks like somebody, I think question number 46, somebody asked when this policy will go into effect, and the answer to that question is February 1st. So, actually that is a week from today.</p>