2019 Open Enrollment (OE) Transaction Summary

Consumer Information & Insurance Oversight (CCIIO)

June 25, 2018

https://www.regtap.info/FFENR.php

Purpose of Batch Auto-Reenrollment

- Enrollees are always encouraged to actively reenroll to ensure that their future year plan meets their needs and budget and reflects the most accurate financial assistance possible. This is also called "active reenrollments"
- Active reenrollment rates in the Exchange are consistently at 70% or above
- Batch Auto-renewal (BAR) is the process outlined in regulation that ensures continuous coverage for enrollees who do not make an active selection by the end of Open Enrollment. This is called "passive reenrollment"
- Issuers receive most auto-renewal transactions in October, followed by subsequent updates based on application updates and plan selections made by the enrollee at the Exchange during OE and beyond

2019 Open Enrollment Experience:
Key Improvements in Batch Auto-Reenrollment (BAR) & OE

- **BAR Cancel Carry Forward Enhancements**
  - Every year from November – March, the FFE cancels future year policies still in passive status if the associated current year policy terminated or canceled after being auto-renewed, since that makes the policy ineligible for auto-renewal
  - Beginning in OE 2019, some enhancements have been made to this process:
    - **New AMRC**. A unique Additional Maintenance Reason Code of CANCEL-CARRYFORWARD has been created so that issuers can distinguish Carry Forward Cancels from other cancels (in previous years, the 834s were coded as voluntary cancels, leading to occasional issuer confusion)
    - **I834 Cancels rather than flat files**. The FFE will send 834 cancel carry forwards from November through March, eliminating the BARCN files used in earlier years after December ("passive cancels" will still use BARCN files)
    - More technical information is included later in this presentation
- **Streamlined Medicare Non-renewal Operations**
  - With the addition of two new Additional Maintenance Reason Code (AMRC) for issuer-initiated terminations and cancelations related to Medicare Anti-duplication, a submission to ER&R of non-renewed enrollments is no longer required (more technical information is included later)
- **Better person tracking**
  - Backend changes improve FFE person matching, making it even less likely that the FFE Member ID will change for the same person
- **Backend changes that further reduce technical errors and help CMS manage BAR operations**

OE 2019 – New Policy

First Open Enrollment Period with same-day voluntary terminations available to enrollees

- A change in the 2019 Payment Notice provides Exchanges the option to allow enrollees to elect same-day policy terminations, replacing the 14 day "reasonable notice" period
- The FFEs have elected to begin offering same-day policy terminations on July 27, 2018
  - Functionality for policies where some but not all covered individuals are ending coverage have always permitted coverage to end the day the enrollee requests the change (sometimes with a HICS case to move the termination date); the new policy and functionality permits same-day terminations for *entire* policies
  - The correct termination date of the entire policy, whether it is same day or in the future, at the enrollee's option, will be identified on the 834 transaction ("some-but-not-all" terms may still require HICS to move the termination date)

An overview of Eligibility & Enrollment topics in the 2019 Payment Notice is at https://www.regtap.info/reg_librarye.php?i=2563

OE 2019 – Medicare Non-Renewal Operations, Continued.

QHP Non-renewal for certain Medicare enrollees where renewal would violate the Anti-duplication Provision of the Social Security Act

- Auto-renewals will be sent by the FFEs without regard to Medicare status
- QHP issuers that have knowledge that an enrollment contains a QHP enrollee that is entitled to Medicare Part A or enrolled in Medicare Part B should non-renew the entire policy if the QHP reenrollment plan will change the policy or contract and duplicates Medicare
  - Issuers should not presume that everyone 65 or older is Medicare entitled
  - Change in policy or contract is a matter of state law
  - Issuers should consult their compliance department

OE 2019 – Medicare Non-Renewal Operations, Continued.

- **Terminations**. An issuer that is ending coverage to comply with the Anti-duplication provision should send the FFE an IC834 term with MTC: 024 and AMRC: TERM-ANTIDUPLICATION effective 12/31 (MRC is Null)
  - Issuers are not permitted to use the TERM-ANTIDUPLICATION AMRC mid-year. Instead, in order to prevent or cancel the auto-renewal without creating a technical issues for late-year life changes reported by the enrollee, issuers should utilize this code ***no sooner*** than October 1
- **Cancelations**. An issuer that receives an FFE BAR transaction for a known Medicare enrollee that violates Anti-duplication should send an IC834 cancel to the FFE with MTC: 024 and AMRC: CANCEL-ANTIDUPLICATION (MRC is Null)
  - Additionally, new initial enrollments (I834) received during or outside of Open Enrollment may be canceled by the issuer prior to effectuation using this code if issuing (or renewing) Marketplace coverage violates Anti-duplication
- **Termination Notice**. When non-renewing or canceling coverage, the issuer should send a termination notice to the non-renewed Medicare entitled/enrolled person noting why coverage will end (or is not issued) and directing those not in Medicare to return to the Marketplace
- **Outreach** is encouraged to direct the enrollees not in Medicare back to the FFE to update their application (making the Medicare family member a non-applicant) and enroll. The FFE will use the cancel and termination codes to flag mixed eligibility enrollees for a SEP to enroll at the FFE call center. The FFE will conduct limited outreach
- **FFE guidance does not change an issuers' obligations** under Section 1882(d)(3) of the SSA, and does not create a new requirement under the guaranteed renewability provisions for issuers to ascertain the Medicare status of their enrollees.

OE 2019 – Medicare Non-Renewal Operations, Continued.

- The addition of specific term/cancel codes for Medicare Anti-duplication replaces previous Enrollment Data Alignment channels:
  - Issuers should not use IC834 “TERM-OTH,” or “CANCEL-OTH” for coverage that is ending or not being issued because of Medicare Anti-duplication
  - **There is no need for a separate Medicare non-renewal submission to ER&R for OE 2019 non-renewals**
  - TERM-ANTIDUPLICATION transactions received October 1 - 10 will prevent auto-renewal; after October 10, it will trigger auto-renewed policies to be cancelled later in Cancel Carry Forward
  - Every attempt should be made to end coverage for Medicare Anti-duplication via IC834 prior to those enrollments being submitted as cancelled or terminated on an RCNI file. If the update is made via reconciliation (12/31 terms aren’t eligible for reconciliation) rather than IC834, the ANTIDUPLICATION term/cancel reason will not be captured, which will cause issues for these consumers and their households if they require any follow-up for SEPs on the Exchange.

Batch Auto Re-enrollment: 2019 vs 2018:

<table>
<tr><th></th><th colspan="2">Last Year (OE for 2018 Coverage)</th><th colspan="2">This Year (OE for 2019 Coverage)</th></tr>
<tr><td rowspan="2">BAR transactions</td><td>First Wave: 10/16 – 10/27 (with touch-ups later)
Included:
• DMIs
• alternate enrollments</td><td>Excluded:
• New enrollments (after 10/8)
• Submitted Not Enrolled (SNE)</td><td>First Wave: c 10/10 – 10/31 (with touch-ups later)
Includes:
• DMIs
• alternate enrollments</td><td>Excludes:
New enrollments (after c 10/7)
Submitted Not Enrolled (SNE)</td></tr>
<tr><td colspan="2">Second Wave: 12/17 – 12/22
Enrollment sent for the first time: 1) New enrollments (after 10/15) including those matched to alternate plans, 2) Submitted Not Enrolled (SNE);

Enrollment sent for the second time (sent M834 via I834) in Late November - December:
1) Current year CiC; 2) Submitted Not Enrolled (SNE); 3) FTR Reprocess</td><td colspan="2">Second Wave:
12/16+
Enrollment sent for the first time: 1) New enrollments (after 10/7) incl those matched to alternate plans, 2) Submitted Not Enrolled (SNE);

Late November - December
Enrollment sent for the second time (typically sent M834 via I834):
1) Current year CiC; 2) Submitted Not Enrolled (SNE); 3) FTR Reprocess</td></tr>
<tr><td rowspan="5">Cancel Carry Forward
(cancel auto-renewals when current year policy later terms/cancels)</td><td>Attribute</td><td>OE 2018</td><td>Attribute</td><td>OE 2019</td></tr>
<tr><td>834 INS03 (Maintenance Type Code)</td><td>024 (Cancel)</td><td>834 INS03 (Maintenance Type Code)</td><td>024 (Cancel)</td></tr>
<tr><td>834 INS04 (Maintenance Reason Code)</td><td>14 (Voluntary Withdrawal)</td><td>834 INS04 (Maintenance Reason Code)</td><td>(null)</td></tr>
<tr><td>834 Additional Maintenance Reason Code (AMRC)</td><td>CANCEL</td><td>834 Additional Maintenance Reason Code (AMRC)</td><td>CANCEL-CARRYFORWARD</td></tr>
<tr><td>Timing</td><td>834s on 11/21/17 & 12/16/17</td><td>Timing</td><td>Similar, except 834s from Nov thru</td></tr>
</table>

Batch Auto Re-enrollment: 2019 vs 2018:

	Last Year (OE for 2018 Coverage)			This Year (OE for 2019 Coverage)		
Passive Cancels (de-duplicating job, occurs weekly during the height of OE, then monthly)	**Delivery**	**Delivery Date** (2017 dates)	**Description**	**Delivery**	**Delivery Date** (est. 2018 dates)	**Description**
	November 2018 Pre-Audit	11/13	Overlaps indicator (passive cancels + other overlaps) in field 89 on the subscriber record only (1 = within HIOS overlap; 2 = across-HIOS overlap); Cancel Source = 4	**November 2019 Pre-Audit**	11/15	Passive Cancels are on the November Pre-Audit for 2019: Overlaps indicator (passive cancels + other overlaps) in field 89 on the subscriber record only (1 = within HIOS overlap; 2 = across-HIOS overlap); Cancel Source = 5; Application Origin = 11
	BARCN8 delivery 1	11/21	Cancels passive enrollments that duplicate an active enrollment	**BARCN9 delivery 1 (Will contain all passive cancels since 11/1)**	11/21	Cancels passive enrollments that duplicate an active enrollment; incremental activity since the last BARCN9 delivery
	BARCN8 delivery 2	11/29		**BARCN9 delivery 2**	11/28	
	BARCN8 delivery 3	12/6		**BARCN9 delivery 3**	12/5	
	December 2018 Pre-Audit	12/19	Overlaps indicator (passive cancels + other overlaps) in field 89 on the subscriber record only (1 = within HIOS overlap; 2 = across-HIOS overlap); Cancel Source = 4	**December 2019 Pre-Audit (Will contain all passive cancels since the November 2019 Pre-Audit**	12/18	Passive Cancels are on the December Pre-Audit for 2019 (see 11/15 delivery for more info)
	BARCN8 delivery 4	12/20	Cancels passive enrollments that duplicate an active enrollment	**BARCN9 delivery 4 (Will contain all passive cancels since BARCN9 delivery 3)**	12/20	Cancels passive enrollments that duplicate an active enrollment

Auto-Reenrollment Files and Delivery Dates

(Dates are Subject to Change)

File	Description	Delivery Date(s)	EFT Code & File Layout
Batch Auto-Reenrollment (BAR) Files	Will re-enroll current Marketplace enrollees into future year coverage.	1st Wave: Begins c 10/10 2nd Wave: December	I834AR (Alternate Enrollments sent I834)
Outreach File	Will identify enrollees (but not why they are on the list) who will lose financial assistance in 2019 if they don't return to FFM because they either 1) **Opt-Outs.** Did not authorize the Federally-facilitated Marketplace (Marketplace) to obtain updated tax return information from the Internal Revenue Service (IRS); or 2) **Special Notice Group**. Have incomes above 500% of the federal poverty level when checked against IRS updated income information; or 3) **FTR**. Received APTC for 2017 but didn't file a tax return for that year and reconcile the APTC using IRS Form 8962; or 4) **Repeat Passive Re-enrollee Group**. Were auto-reenrolled into 2017 and 2018 coverage with APTC, did not submit any application updates in 2017 or 2018, and have no available tax data (income or FTR) from 2016 or 2017 Optional issuer outreach to direct these enrollees to actively apply and enroll in Marketplace coverage during Open Enrollment to maintain financial assistance.	10/15	IOUTRC https://zone.cms.gov/document/ioutrc-file-layout
Switch File	Will list current year subscribers who have not yet been auto-reenrolled and have actively switched to a different issuer for future year Marketplace coverage. Current year issuers should non-renew subscribers if on the Switch File	Daily from 11/3 to 12/15	SWTFL (same as previous) https://zone.cms.gov/document/reenrollment-transaction-summary-issuers-2016-coverage
Passive Cancels (BARCN9 in Incremental Pre-Audit File layout)	Will cancel passive reenrollments that duplicate active enrollments for future year Marketplace coverage. This is primarily associated with disconnected applications created when enrollees or their assisters fail to access their existing pre-populated future year application	BARCN9 Weekly 11/21,11/28, 12/05,12/20 Check Overlaps on 11/15 & 12/18 Pre-Audit Files	BARCN9 See https://zone.cms.gov/system/files/documents/standard_issuer_enrollment_data_files_v2_0.pdf

Auto-Reenrollment Files and Delivery Dates

(Dates are Subject to Change)

File	Description	Delivery Date(s)	EFT Code & File Layout
Carry Forward Cancels	Will cancel auto-reenrollments that are subsequently ineligible for BAR due to late terminations of current year Marketplace coverage. Active reenrollments or auto-reenrollments that have been updated by the enrollee will NOT be cancelled in this job, though in some scenarios issuer may still cancel active reenrollment (see Exchange Enrollment Manual, Chapter 6).	Intermittent Late November thru Dec 16+, then monthly January thru March	I834
BAR Daily Progress Report	This report is individualized to each returning issuer and counts the number of BAR-eligible policies as of the time the control documents for BAR were set against the actual BAR policies ever sent, with similar counts for issuers receiving alternate enrollments. The report compares the delivered vs eligible/projected counts to arrive at a completion percent. It is intended to help issuers detect and report issues preventing auto-renewal.	Daily once BAR begins until end of BAR with pause in delivery between waves of BAR.	MISC9
Missing Outbound 834 IPA	This file is a special Incremental Pre-Audit File that will contain full information for enrollment transactions that failed to convey to the Issuer via the standard EDI 834. This IPA File will contain the full Pre-Audit information for all enrollment transactions that failed to convey successfully to the Issuer during the period covered by the ISUIPA.	11/6 11/20 11/26 12/10	MOIPA9 https://zone.cms.gov/system/files/documents/standard_issuer_enrollment_data_files_v2_0.pdf
BAR Failures	A list of enrollments delivered to issuers that because of processing issues were not auto-renewed; impacted issuers are encouraged to do outreach to get the enrollees, who are flagged for SEPs at the Marketplace Call Center, to actively reenroll	One delivery in early January	IOUTRC https://zone.cms.gov/document/ioutrc-file-layout
Post-BAR Reinstatements	A list of enrollments delivered to issuers where the 2018 coverage was reinstated by the issuer in Enrollment Data Alignment after 2019 BAR concluded and there is no apparent 2019 active reenrollment. These enrollees are flagged for 2019 SEPs at the Marketplace Call Center and issuers are encouraged to conduct voluntary outreach	Likely one in February and one in March	IOUTRC https://zone.cms.gov/document/ioutrc-file-layout

Auto Re-enrollment Issuer Communication

- Renewal notice (pre-OE): if future year eligibility from FFM isn't yet available, use current year APTC as an estimate and communicate to consumers that it will change; plan change descriptions presume current year CSR; issuers have flexibility in communicating to consumers that APTC/CSR is an estimate
  - See Standard Renewal & Discontinuation Notices at https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Final-Updated-Federal-Standard-Renewal-and-Product-Discontinuation-Notices-508.pdf
- Second notice (post BAR)/January bill (December): will contain updated APTC applied to premium; issuers should not provide a Summary of Benefits and Coverage (SBC) until they receive this updated information about the appropriate CSR variant, if applicable, from the Marketplace.
- Consumer communications during OE: issuers should always direct consumers to update income at the Marketplace for future year coverage during OE to improve accuracy of APTC and avoid issues later on.

Re-enrollee consumer communications

General framing for consumer messaging from issuers:

- Strong encouragement to update now & ensure accurate pricing for next year (go to HC.gov). OE ends Dec 15th, which means that's the last day to confirm your coverage for 2019.
- Update your application to get your final pricing for next year. You must act by Dec 15 to update your app with the Marketplace and confirm your current plan
- Make sure this is still the right plan for you next year
  - Your last chance to confirm your plan for the year is Dec 15th. **You won't be able to change your plan after this**.
  - Contact us for help reviewing your benefits & doctors
  - We can help you understand your pricing, coverage and options
  - We can also help you if you think another plan might be better
- There's only one deadline this year, so don't wait

Re-enrollee consumer communications, continued.

While auto-enrollment is still invisible to consumers (thru 12/16)

- Don’t say “you’re automatically enrolled” or “your plan is confirmed/locked-in” – consumers that need to act may be confused and fail to update their application (and then are more likely to drop out from not paying premiums at full price)
- Provide updated financials based on BAR if available and tailor messaging around BAR scenarios when possible (i.e. might lose tax credits, your last opportunity to get these back for your current plan is Dec 15th)

Cross-issuer consumer communications

Gaining issuer can start messaging to consumers before OE including pricing. Recommend not billing before OE if possible to encourage consumers to review options & actively pick a plan for January.

General message frames:

- Emphasize OE dates and encourage active choice in selecting a new plan (whether it's the alternate or something else that better meets their needs)
- We know your plan is leaving, we're here to help, you've been matched with X plan
  - Let's check your doctors, benefits, and coverage
  - Contact us and we'll help you review & find the plan that's right for you
- If you don't act, you may be automatically enrolled in X plan. Don't wait, contact us to review this plan and other options before Dec 15th and choose what works best for you
- Update your application with the Marketplace and say you're losing coverage Dec 31. You can then confirm this alternate plan or choose a new one.

2019 OE Transaction Summary
BAR/Passive Reenrollments & Alternate Enrollments

Scenario	Type Code	Maintenance Reason Code (Sent & Received)	Origin Type	AMRC	Issuer Confirms Effectuation?	EFT Functional Code
Alternate Enrollments (Non-renewed enrollments that are auto-reenrolled at CMS or via State DOI direction into new Issuer)	021 (Addition)	Sent by FFM: EC Returned to FFM by Issuer: 28	11 (Auto-reenrollment)	PASSIVE REENROLL – NEW TO ISSUER	Yes	I834
Passive reenrollments of effectuated policies	021 (Addition)	Sent by FFM: 41 Returned to FFM by Issuer: N/A	11 (Auto-reenrollment)	PASSIVE	No	I834AR
Passive reenrollments of in-flight initial policies (2018 policy still in initial status in FFM when auto-reenrolled for 2019)	021 (Addition)	Sent by FFM:41 Returned to FFM by Issuer: 28	11 (Auto-reenrollment)	PASSIVE-INITIAL	Yes (Note: If FFM receives 2018 confirmation, will carry over to 2019)	I834AR
Passive reenrollments with new subscribers (Due to regrouping, especially age-offs)	021 (Addition)	Sent by FFM:41 Returned to FFM by Issuer: 28	11 (Auto-reenrollment)	PASSIVE -NEW SUBSCRIBER	Yes	I834AR

2019 OE Transaction Summary
Active Reenrollments after an enrollee was BARed

Scenario	Type Code	Maintenance Reason Code (Sent & Received)	Origin Type (≠11)	AMRC	Issuer Confirms Effectuation	EFT Functional Code
Active reenrollments of effectuated policies, **post-BAR, income change reported (Same subscriber and QHP ID)** *For active reenrollments post-BAR, the MRC and AMRC will vary depending on the type of changes the consumer makes to their application. *Illustrated*: a financial change	001 (Maintenance)	Sent by FFM: (null) Returned to FFM by Issuer: N/A	1, 2, 3, etc. (FFM Online, etc.)	FINANCIAL CHANGE* (AMRC reflects the change to the initial BAR enrollment, and follows M834 operations guide at https://zone.cms.gov/document/federally-facilitated-marketplace-maintenance-834-operations-manual	No	I834
Active reenrollment with new subscriber (treated the same as a new enrollment) *If the active reenrollment takes place post-BAR, the issuer of previous passive policy will also receive a cancel I834	021 (Addition) 024 (Cancel)	Sent by FFM: EC Returned to FFM by Issuer: 28 Sent by FFM: 14 Returned to FFM by Issuer: N/A	1, 2, 3, etc. (FFM Online, etc.) 1, 2, 3, etc.	CIC CANCELCIC	Yes N/A	I834 I834
Active reenrollment in a different 14 digit QHP ID *If the active reenrollment takes place post-BAR, the issuer of previous passive policy will also receive a cancel I834	021 (Addition) 024 (Cancel)	Sent by FFM: EC Returned to FFM by Issuer: 28 (if same subscriber and HIOS, and previous year policy is effectuated, then N/A) Sent by FFM: 14 Returned to FFM by Issuer: N/A	1, 2, 3, etc. (FFM Online, etc.) 1, 2, 3, etc.	CIC CANCELCIC	Yes – Unless the same subscriber and HIOS, and the previous year policy is effectuated N/A	I834 I834

2019 OE Transaction Summary

Active Reenrollments pre-BAR & New Initial Enrollments

Scenario	Type Code	Maintenance Reason Code (Sent & Received)	Origin Type (≠11)	AMRC	Issuer Confirms Effectuation?	EFT Functional Code
Active reenrollments of effectuated policies, **pre-BAR (Same subscriber and QHP ID)**	021 (Addition)	Sent by FFM: EC Returned to FFM by Issuer: N/A	1, 2, 3, etc. (FFM Online, etc.)	ACTIVE REENROLL	No	I834
Active reenrollments of initial (non-effectuated) policies, **pre-BAR (Same subscriber and QHP ID)**	021 (Addition)	Sent by FFM: EC Returned to FFM by Issuer: 28	1, 2, 3, etc. (FFM Online, etc.)	ACTIVEREENROLL-INITIAL	Yes	I834
New active enrollment (not a reenrollment)	021 (Addition)	Sent by FFM: EC Returned to FFM by Issuer: 28	1, 2, 3, etc. (FFM Online, etc.)	N/A	Yes	I834

2019 OE Transaction Summary
Other Post-BAR Scenarios

- Other post-BAR scenarios include:
  - Changes in Circumstances (CICs) on current year applications
  - CICs on future year applications
  - Expirations of DMIs (Citizenship and Income DMIs)
  - Terminations of current year policies for non-payment
- For a breakdown of the transactions for these scenarios, visit (no changes since 2017): https://zone.cms.gov/document/2017-open-enrollment-scenarios

Batch Auto-reenrollment and National Producer Number (NPN)

Illustration of when NPN identifying an agent or broker will be carried forward by BAR

NPN Scenarios	NPN on Current Year Application or Enrollment	NPN Sent on 1000c Loop on Next Y Enrollment Transaction
Auto-reenrolled (passive) consumer with FFM Policy associated with NPN before c. October 6	123	123
Auto-reenrolled (passive) consumer with FFM Policy updated with NPN after the enrollee has been auto-reenrolled	123	N/A (at the time BAR auto-renewed the member, there was no NPN to carry forward)*
Active reenrollment by returning consumer who updates the next year application, and is able to view and edit the current year A/B, but doesn't change or remove the A/B associated with his or her application	456	456 (The A/B info from the current year application will be pre-populated on the next year application)**
Active reenrollment by returning consumer who removes the A/B information on his or her next year application	789	N/A (A consumer can remove the A/B information on the future year application

*Note: NPNs received post BAR Wave 1 via Recon will be relayed to issuers in BAR Wave 2.

**Note: If the most recent version of a consumer's current year application includes an NPN, the NPN will pre-populate on the future year application; the NPN will not pre-populate if it is not included on the most recent version of the current year application. This is particularly important for DE Partners using the DE Consumer Flow, who only submit the NPN via the Submit Enrollment Request but don't include it on the application itself. NPNs submitted via the Submit Enrollment Request are only written to the consumer's policy, but not the application. This highlights the importance of DE Partners assisting their clients with the reenrollment process.