2020 Batch Auto-Reenrollment Launch

Consumer Information & Insurance Oversight (CCIIO)

October 7, 2019

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

Batch Auto-Reenrollment (BAR) begins

Week of October 15, 2019

- Some issuers will begin receiving auto-reenrollments for both regular BAR and alternate enrollments (if applicable) on or around 10/15/2019.
- A given issuer may receive its auto-renewals and alternate enrollments on the same day.
  - Consumers matched to an alternate plan will receive a notice from CMS identifying the new issuer electronically in the same day that the issuer receives the transaction, and by mail within about a week
  - Issuers may want to wait prior to contacting alternate enrollments until a week after receiving the transaction if they want CMS to be the first messenger of the match. Issuers receiving cross-issuer enrollments should not send 2020 invoices until after November 1
  - For more information on the CMS notice to enrollees matched to an alternate plan see the "cross issuer notice" at https://marketplace.cms.gov/applications-and-forms/notices.html

Joining CMS Issuer Communications Daily E-mail

- Please check your CMS Issuer Communication emails daily for updates.
- To be added to the distribution list send an e-mail to:
  - CMS_Issuer_Communications@cms.hhs.gov
  - Subject line:
    - "Add POC to Distribution List"

Batch Auto Re-enrollment: 2020 vs 2019:

Minor change is planned (key changes in red)

	Last Year (OE for 2019 Coverage)	This Year (OE for 2020 Coverage) *All dates subject to change*
October Wave of BAR All eligible current year enrollments are auto-renewed for the future plan year beginning in mid-October.		
Dates	Planned: 10/15 – 11/2 Actual: 10/15 – 10/26 (with touch-ups later)	10/15 – 11/1
Incremental Wave Any new current year enrollments created since BAR began are auto-reenrolled, while updates to already-BAR'd current year policies are carried forward to BAR policies still in passive status		
Dates	11/21, 12/3	12/2
Failure-to-Reconcile (FTR) Re-process Restores financial assistance to those previously stripped of APTC for failing to reconcile APTC with IRS if enrollees later reconciled; typically sent M834 but enrollments w/ post-BAR CIC sent via I834AR		
Dates	12/8-9	12/10
December Wave Any new current year enrollments created since incremental wave are auto-reenrolled; while updates to already-BAR-d current year policies are carried forward to BAR policies still in passive status. Future year "submitted-not-enrolled" applications are used to update BAR policies still in passive status		
Dates	Planned: 12/17 – 12/31 Actual: 12/19 – 12/20	12/16 – 12/31

Auto Re-enrollment Files and Delivery Dates

(Dates are Subject to Change)

File	Description	Delivery Date(s)	EFT Code & File Layout
Batch auto re-enrollment (BAR) Files	Will re-enroll current Marketplace enrollees into future year coverage.	1st Wave: Begins c 10/15 Incremental Wave: 12/2 2nd Wave: 12/16+	**I834AR** (Alternate Enrollments sent I834)
Outreach File	Will identify enrollees (but not why they are on the list) who will lose financial assistance in 2020 if they don't return to FFM because they either **1)** **Opt-Outs.** Did not authorize the FFE 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 2018 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 2018 and 2019 coverage with APTC, did not submit any application updates in 2018 or 2019, and have no available tax data (income or FTR) from 2017 or 2018 Optional issuer outreach to direct these enrollees to actively apply and enroll in Marketplace coverage during Open Enrollment to maintain financial assistance.	October 2nd, 2019	**IOUTRC** See Standard Issuer Enrollment Data Files document on zONE at: https://zone.cms.gov/document/enrollment-data-reconciliation
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** https://zone.cms.gov/document/re-enrollment-transaction-summary-issuers-2016-coverage
Passive Cancels **(BARCN0 in Incremental Pre-Audit File layout)**	Will cancel auto re-enrollments 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	BARCN0 Weekly 11/20, 11/27, 12/4, 12/10 Check Overlaps on Nov & Dec Pre-Audit Files	**BARCN0** See Standard Issuer Enrollment Data Files document on zONE at: https://zone.cms.gov/document/enrollment-data-reconciliation

Auto Re-enrollment Files and Delivery Dates

(Dates are Subject to Change)

File	Description	Delivery Date(s)	EFT Code & File Layout
Cancel Carry Forward	Will cancel auto re-enrollments that are subsequently ineligible for BAR due to late terminations of current year Marketplace coverage. Active re-enrollments or auto re-enrollments that have been updated by the enrollee will NOT be cancelled in this job, though in some scenarios issuer may still cancel active re-enrollment (see Exchange Enrollment Manual, Chapter 6).	Intermittent 12/2 and 12/16+, then monthly January thru March	**I834** **AMRC: CANCEL-CARRYFORWARD**
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-enrollment.	Daily once BAR begins until end of BAR with pause in delivery between waves of BAR.	**MISC0**
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.	11/5 11/19 11/26 12/10	**MOIPA0** See Standard Issuer Enrollment Data Files document on zONE at: https://zone.cms.gov/document/enrollment-data-reconciliation
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** See Standard Issuer Enrollment Data Files document on zONE at: https://zone.cms.gov/document/enrollment-data-reconciliation
Post-BAR Reinstatements	A list of enrollments delivered to issuers where the 2019 coverage was reinstated by the issuer in Enrollment Data Alignment after 2020 BAR concluded and there is no apparent 2020 active re-enrollment. These enrollees are flagged for 2020 SEPs at the Marketplace Call Center and issuers are encouraged to conduct voluntary outreach	Likely one in February and one in March	**IOUTRC** See Standard Issuer Enrollment Data Files document on zONE at: https://zone.cms.gov/document/enrollment-data-reconciliation

BAR Progress Report

By request of issuers, CMS will deliver a daily tab-delimited report **via EFT code MISCo** to begin on 10/16/19 to health and dental plan issuers listing the following attributes:

Attribute	Definition
bar_eligible_policies	2019 coverage in initial or effectuated status with 12/31/19 Plan Benefit End Date & EOY = False (excludes 2019 policies with active 2020 reenrollments)
regular_auto_reenrolled	Total count to date of 2020 auto-renewals (policy origin = 11, and 2019 and 2020 HIOS match).
estimated_alternate_enrollments	[only applies to issuer who were notified by CMS] The count of new members (number of people) estimated by CMS to be matched to the issuer as of 10/9/19.
alternate_enrollments	The count of alternate enrollments (number of policies) sent to date (policy origin = 11, and 2019 and 2020 HIOS do not match

Batch Auto-Reenrollment (BAR)

Reminders:

- **Issuers will receive 2020 reenrollment transactions for regular BAR (EFT I834AR) and alternate enrollments (EFT I834) in October BAR**
    - Only late 2019 enrollments (e.g., enrolled for the first time with effective date of 12/1/19) and active reenrollees who have started an application before being BARed are the only major groups that an issuer would receive for the first time in December BAR
- **For more information on OE 2020**, see; https://protect2.fireeye.com/url?k=855a3945-d90e106e-855a087a-0cc47a6d17cc-46e31ee102adbc9b&u=https://www.regtap.info/reg_librarye.php?i=2918
- **Issuer Outreach File** was distributed to issuers 10/2/19 for voluntary outreach to encourage the active reenrollment of your members who will otherwise lose financial assistance in 2020

Opt out of Batch Auto Re-enrollment (BAR) Button

- The “Stop Coverage for 2020” is now live in an enrollee’s Marketplace account and will remain available through December 31
- This functionality enables consumers who do not want any Marketplace coverage for 2020 to opt out of re-enrolling in their 2019 coverage for 2020, but keep their current plan through December 31.
  - This is particularly useful for consumers who are getting other coverage for 2020 (e.g. job-based coverage)
- This button appears in their Marketplace account landing page as well as the “My Plans & Programs” section
- Consumers who have a current policy will see the Stop Coverage button

Medicare Non-Renewal Operations

Reminder: As a reminder, issuers that must non-renew QHP policies in order to comply with the Anti-duplication provision of the Social Security Act, may begin sending termination 834s to the FFE. For more information, see;

- https://protect2.fireeye.com/url?k=d107e200-8d53cb2b-d107d33f-0cc47a6d17cc-c581d779d726f533&u=https://protect2.fireeye.com/url?k=8a6f6991-d63b40ba-8a6f58ae-0cc47a6d17cc-e58bc553219fce69&u=https://www.regtap.info/uploads/library/ENR_MedicareNonRenewalProcessOE2020_091619_5CR_091919.pdf