Batch Auto Reenrollment (BAR) and 2019 Open Enrollment (OE)

Consumer Information & Insurance Oversight (CCIIO)

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

The information provided in this presentation is not intended to take the place of the statutes, regulations, and formal policy guidance that it is based upon. This material summarizes current policy and operations as of the date it was uploaded to RegTap. Links to certain source documents may have been provided for your reference. We encourage persons taking the course to refer to the applicable statutes, regulations, and other interpretive materials for complete and current information

Open Enrollment Begins November 1

The Open Enrollment Period for 2019 Coverage runs from November 1 – December 15, 2018

<u>Reminder of Files Sent to Issuers After November 1:</u>

- **Switch File**
  - The Switch file (sent via EFT SWTFL) will begin daily delivery on 11/3/18. The file lists 2018 subscribers who have not yet been auto-reenrolled and have actively selected a different issuer for 2019 year Marketplace coverage.
  - Current year issuers should non-renew subscribers if they are on the Switch File.
  - The Switch File will run until about 12/15/17.

- **During BAR/Open Enrollment** season, issuers can expect to receive both 2018 and 2019 enrollments sent via EFT I834.

Open Enrollment Begins November 1

<u>Reminder of Files Sent to Issuers After November 1:</u>

- BARCN9 Passive Cancel Files
  - Because enrollees or their assisters occasionally bypass their existing pre-populated application, and create a disconnected enrollment, the FFE will cancel passive reenrollments that duplicate active enrollments for future year Marketplace coverage. Issuers must apply the cancel on the FFE-Assigned Policy ID indicated on the BARCN9 file.

BAR: Common Questions & Answers

- ***Can an issuer cancel a consumer's passive enrollment at the consumer's request or is the consumer required to contact the Marketplace?***
  - An issuer may cancel a passive re-enrollment (aka BAR, policy origin = 11) at consumer's request. Issuers should report the cancel back in reconciliation, ER&R, or via IC834.
- ***For 2018, when a member is auto-renewed, will they receive a new Application ID?***
  - Yes, there will be a new FFE Application ID for the new coverage year. The FFE-Assigned Policy ID will also change. FFE-assigned Member IDs remain the same year-over-year.
- ***Will the BAR include demographic changes?***
  - The BAR file will include all changes that have been reconciled with the FFE up to that moment. Any demographic changes the consumer made in the year will be in the BAR file.

BAR:
Common Questions & Answers (continued)

- ***Does a dependent coming off a parent's plan need to be re-rated?***
  - The FFE applies issuer age off rules during BAR, and both the parents and the young adult child who becomes a new subscriber will be rated as of their age on 1/1/19.
- ***If we terminate the current year policy due to non-payment after we receive the BAR file and before January 1st, can we cancel the member's BAR policy as well?***
  - **FFE "Cancel-Carry-Forward."**
    - The FFE will cancel auto-reenrollments that are subsequently ineligible for BAR due to late terminations/cancelations of current year Marketplace coverage
    - The FFE sends I834 cancels to issuers periodically from November through March.
    - The I834 cancels have a unique Additional Maintenance Reason Code of **CANCEL-CARRYFORWARD**
    - Active reenrollments/auto-reenrollments that have been updated by the enrollee will NOT be cancelled in this job, though in some scenarios the issuer may still cancel active reenrollments (see Exchange Enrollment Manual, Chapter 6.4.2).
  - Issuers need not wait for the Cancel Carry Forward 834, and may instead use enrollment data alignment to cancel the auto-reenrollment that is no longer covered by guaranteed renewal because the current year policy later terminated