CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

2018 Batch Auto-Reenrollment Update



Center for Consumer Information and 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.

Batch Auto-Reenrollment (BAR) Update

There will be small runs of BAR early this week, with many issuers receiving small volumes related to two populations:

- 2017 enrollments created or reinstated after 10/16/17
- Enrollments held while the FFM implemented a small technical change

Reminders:

- **Switch File (EFT SWTFL)** began daily delivery 11/3/17
  - 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***
  - Because nearly everyone was BARed before Open Enrollment (OE), the Switch File is much smaller (less than 5% of 2017)
  - Runs 11/3/17 to c. 12/15/17 (no delivery if no switchers since last report)

Batch Auto-Reenrollment (BAR) Update

Reminders:

- **BAR on a policy the issuer has recorded as terminated**
  - The FFM auto-renews all current enrollments using FFM records
  - If the BARed member is validly terminated in the issuer record, the issuer should ensure that the associated 2017 enrollment is terminated/cancelled in the FFM through reconciliation or IC834
    - The FFM will then cancel the 2018 auto-reenrolled policy associated with the later-terminated 2017 policy in I834 cancel jobs scheduled for late November and c. December 16, 2017 (and monthly BARCN8 jobs January – March 2018)
    - An issuer need not wait for the FFM cancel-carry-forward jobs and may cancel the 2018 BAR policy via IC834, rejected enrollment tab of the ER&R dispute, etc
    - Note that guaranteed availability requires issuers to accept active reenrollments that are new issuances (rather than updates on an already terminated policy)
- **BAR duplicates an Active Enrollment**
  - If enrollees or their assisters create a duplicate enrollment via a disconnected application, the Marketplace will cancel the passive via the BARCN8 jobs (IPA layout) delivered to issuers 11/21, 11/29, 12/6, and 12/20.
  - Issuers may alternatively send a IC834 cancel on the duplicate 2018 passive rather than waiting for the BARCN8 job

Medicare Non-renewal: Forms to ER&R now by 11/10/17

- **Reminder**: CMS requests that issuers submit its list of non-renewed Medicare-duplicative policies by an extended deadline of 11/10/17 to the ER&R contractor
  - This enables the Marketplace to perform any necessary outreach, provide SEPs were applicable, and have appropriate scripting at the Marketplace Call Center
- Enrollees who are terminated because they share a policy with a Medicare-enrollee will be eligible for a Special Enrollment Period
  - The Marketplace Call Center will have lists of enrollees derived from issuer submissions that are flagged eligible for the SEP
  - This SEP will not require an enrollee to submit documentation as the circumstances are already verified
- Access the ER&R form to report non-renewals due to dual Medicare enrollment at https://zone.cms.gov/system/files/documents/medicare_non_renewal_list_v1.xlsx
- For additional information on non-renewal operations see https://www.regtap.info/uploads/library/ENR_MedicareNonRenewal_Non_Issuance__OpGuidance_091817_5CR_100417.pdf