

Non-Special Enrollment Period (SEP) Change In Circumstance (CIC) Grouping Error (2/4/19)

*Consumer Information &
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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

Non-SEP CIC Enrollment Grouping Issue

Impacting Groups with Multiple Members: Background

- On Tuesday, January 8th, CMS alerted Issuers to a defect impacting a small number of enrollees who were in a multi-member enrollment group and reported a change in circumstance (CIC) which did not qualify them for a Special Enrollment Period (SEP)
 - Instead of maintaining the same enrollment group that existed prior to the change, the Marketplace broke out each member into their own enrollment group
- CMS implemented a fix for this defect on 12/19 and plans to remediate the impacted population through a data clean-up where possible
 - CMS will provide a Special Enrollment Period (SEP) for enrollments that cannot be fixed through data clean-up.
- On Wednesday, January 9th, CMS delivered an Incremental Pre Audit File (IPA) of enrollees impacted by this defect to Issuers
 - The purpose of this file was informational only

Non-SEP CIC Enrollment Grouping Issue: Data Clean-Up

- Last week, CMS performed the data clean-up for the majority of the enrollees impacted by this issue
- CMS will provide Issuers with a full Incremental Pre-Audit (IPA) File for the corrected population the day after the data clean-up has been completed
- CMS encourages Issuers to provide messaging to enrollees that have been reconsolidated into a single enrollment grouping through data clean-up
 - Key points for messaging to the data clean-up population should include:
 - Enrollees have been regrouped from multiple policies to a single policy;
 - Enrollees that are now dependents on the single policy may need to update medical providers with the new policy number;
 - Enrollees should check automated billing information to see if any updates are required due to the policy change for dependents

Non-SEP CIC Enrollment Grouping Issue: Special Enrollment Period (SEP)

- CMS has identified certain complex cases where this issue cannot be fixed through data clean-up, and will offer a SEP for that population through March 30th
 - CMS will conduct email outreach to alert this population of SEP-eligibility
- CMS will also provide Issuers with an outreach data file (IOUTRC) on Tuesday, January 29th, for this population and encourages Issuers to provide messaging to this SEP-eligible population as well, as we expect Issuers will receive consumer questions related to the enrollment grouping issue directly

Non-SEP CIC Enrollment Grouping Issue: Special Enrollment Period (SEP) (continued)

- Key points for messaging to the SEP-eligible population include:
 - **Explanation of issue and SEP-eligibility:** Due to a Marketplace technical issue related to processing your 2019 Marketplace application, your ability to enroll together with your family members in health coverage may have been impacted. As a result, **you may qualify for a Special Enrollment Period** to enroll in 2019 health coverage together with your family members.
 - **Explanation of impact of family members being enrolled separately:** Health plans may require you to pay for a certain amount of covered services before the insurance plan starts. After you pay these amounts – called deductibles – you usually pay only a [copayment](#) or [coinsurance](#) for covered services. Family plans may have an individual deductible, which applies to each person on the policy, and a family deductible, which applies to all family members. Currently, each of your family members is enrolled in a separate insurance policy. You may save money by enrolling together with your family members on a single policy.
 - **Description of how to access SEP:** If you want to enroll in 2019 health coverage together with your family members on a single policy through the Marketplace, **call the Marketplace Call Center at 1-800-318-2596 (TTY: 1-855-889-4325)**. If eligible, you have through March 30th to update your 2019 Marketplace health plan.