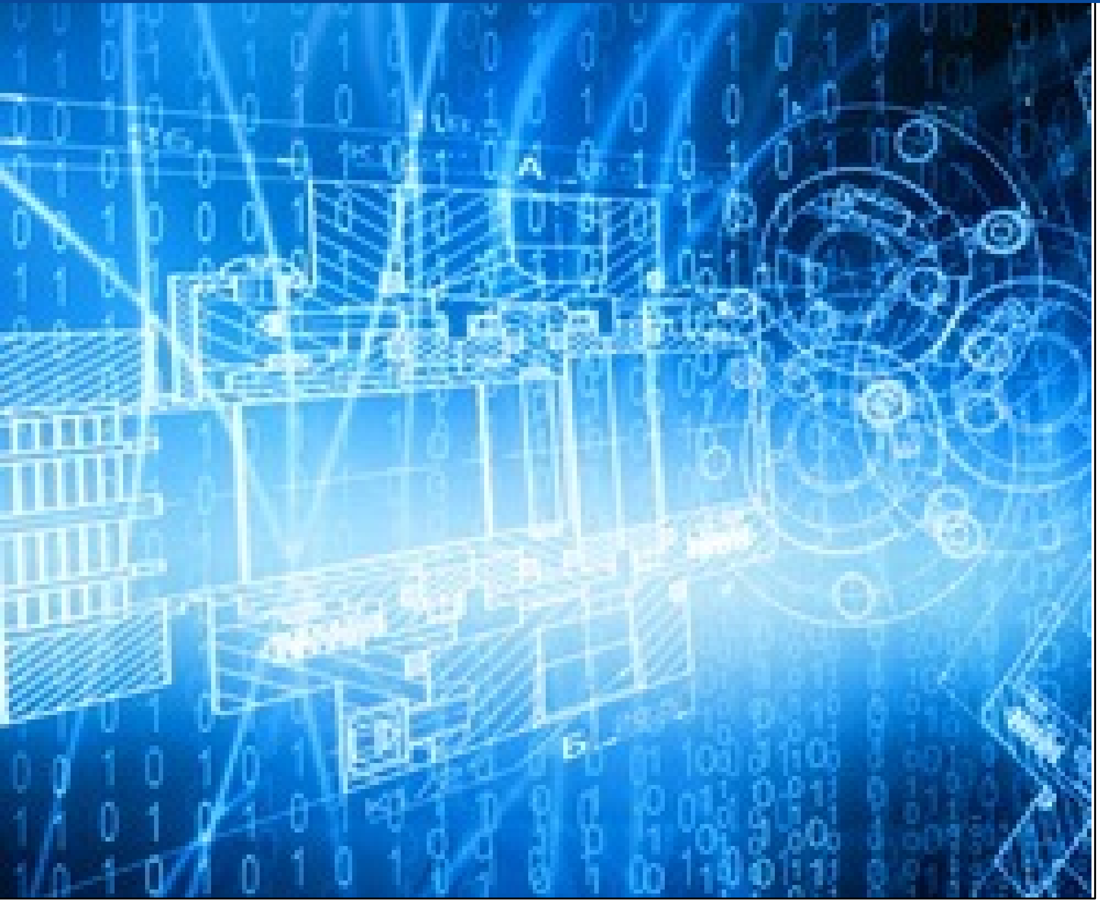
CENTERS FOR MEDICARE & MEDICAID SERVICES

2020 Open Enrollment (OE) Transaction Summary



Center for Consumer Information & Insurance Oversight (CCIIO)

June 10, 2019

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

Purpose of Batch Auto Re-enrollment

- Enrollees are always encouraged to actively reenroll. This ensures the future year plan meets their needs and budget, as well as, reflects the most accurate financial assistance possible. This is called "active re-enrollment".
  - Active re-enrollment rates in the Exchange are consistently at 70% or above

- Batch Auto Re-enrollment (BAR) is the process outlined in regulation that ensures continuous coverage for enrollees who do not actively re-enroll by the end of Open Enrollment. This is called "passive re-enrollment".

- Issuers receive most auto re-enrollment transactions in October, followed by subsequent updates based on changes to the application and/or plan selections made by the enrollee during OE and beyond.

2020 Open Enrollment Experience:

Key Improvements in Batch Auto Re-enrollment (BAR) & OE

- CMS will remove deceased member(s) from 2019 self-only coverage through the Death Periodic Data Matching process to prevent them from being BAR' d.
- CIC Carryforward will send an Additional Maintenance Reason Code (AMRC) of CANCELCIC to be consistent with M834 operational guidance (instead of CANCEL-CARRYFORWARD).
- SEPs that are expired as of the date of BAR will not be carried over to the future year re-enrollment.
- Don't send print Marketplace Open Enrollment Notice (MOEN) when consumer applied through EDE and didn't request printed notice
- Tobacco rating carry forward to be updated to minimize date of last tobacco use issues.

2020 Open Enrollment Experience:
Key Improvements in Batch Auto Re-enrollment (BAR)

- Allow consumers to cancel a future terminated BAR policy not yet visible in the enrollees Marketplace Account when cancelling the future active enrollment. (This happens when an enrollee actively selects a new plan with a 2/1 effective date and then decides to cancel all coverage.)
  - For OE 2019, enrollees in this rare scenario were blocked from cancelling coverage

OE 2020 – Medicare Non-Renewal Operations

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

- BAR transactions 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 re-enrollment 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 2020 – Medicare Non-Renewal Operations

- **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 or Cancelation Notice**. When non-renewing or canceling coverage, the issuer is required to send a termination or cancelation 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 in order to receive a Special Enrollment Period (SEP).
- **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 2020 – Medicare Non-Renewal Operations

- 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.**
  - TERM-ANTIDUPLICATION transactions received October 1 - 10 will prevent auto re-enrollment; 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: 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)	10/14 – 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

Batch Auto Re-enrollment: 2020 vs 2019:

Minor change is planned (key changes in red)

CIC-Carry Forward (carries forward to the future year enrollment changes effective after BAR)	**Attribute**	**OE 2019**	**Attribute**	**OE 2020**
	834 INS03 (Maintenance Type Code)	024 (Cancel)	834 INS03 (Maintenance Type Code)	024
	834 INS04 (Maintenance Reason Code)	(null)	834 INS04 (Maintenance Reason Code)	14
	834 Additional Maintenance Reason Code (AMRC)	CANCEL-CARRYFORWARD	834 Additional Maintenance Reason Code (AMRC)	CANCELCIC CANCEL-CARRYFOWARD will continue to eliminate BAR policies when current year terms
	Timing *(actual)*	834s on 11/21/18, & 12/03/18, & 12/19-20	Timing *(estimated start dates)*	Similar, except 12/2/19 & 12/16/19 only

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 10/14 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.	Early October	**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

Auto Re-enrollment Issuer Communication

- **Re-enrollment 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 2020.
- Update your application to get your final pricing for next year. You must act by Dec 15th to update your application 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

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

- 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)

Alternate Enrollee 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 31st . You can then confirm this alternate plan or choose a new one.

2020 OE Transaction Summary

BAR/Auto Re-enrollments & Alternate Enrollments

Scenario	Type Code	Maintenance Reason Code (Sent & Received)	Origin Type	AMRC	Issuer Confirms Effectuation?	EFT Functional Code
1) 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 re-enrollment)	PASSIVE REENROLL –NEW TO ISSUER	Yes	I834
2) Auto re-enrollments of effectuated policies	021 (Addition)	Sent by FFM: 41 Returned to FFM by Issuer: N/A	11 (auto re-enrollment)	PASSIVE	No	I834AR
3) Auto re-enrollments of in-flight initial policies (2019 policy still in initial status in FFM when auto-reenrolled for 2020)	021 (Addition)	Sent by FFM:41 Returned to FFM by Issuer: 28	11 (auto re-enrollment)	PASSIVE-INITIAL	Yes *(Note: If FFM receives 2019 effectuation, will carry over to 2020)*	I834AR
4) Auto re-enrollments with new subscribers (Due to regrouping, especially age-offs)	021 (Addition)	Sent by FFM:41 Returned to FFM by Issuer: 28	11 (auto re-enrollment)	PASSIVE -NEW SUBSCRIBER	Yes	I834AR

2020 OE Transaction Summary

BAR/Auto Re-enrollments & Alternate Enrollments

Scenario	Type Code	Maintenance Reason Code (Sent & Received)	Origin Type	AMRC	Issuer Confirms Effectuation?	EFT Functional Code
5) Auto-reenrollments to a new Issuer ID offered by the same parent company (Issuer ID changes but Plan ID Crosswalk Reason ≠ 8)	021 (Addition)	Sent by FFM:41 Returned to FFM by Issuer: 28	11 (auto re-enrollment)	PASSIVE – NEW SUBSCRIBER	Yes (Federal rules neither require nor prohibit the collection of a binder, however)	I834AR
6) "Alternate" enrollments to original issuer. Issuer discontinued effectuated policies (no reenroll option) for a service area it still serves, & state or CMS matches them to same issuer as alternate enrollments (Issuer ID the same but Crosswalk = 8)	021 (Addition)	Sent by FFM: 41 Returned to FFM by Issuer: N/A	11 (auto re-enrollment)	PASSIVE	No	I834AR
7) Active reenrollment updating an effectuated BAR policy associated with a current year policy being terminated 10/31. Issuer receives a M834 for BAR policy effective 1/1. Because this doesn't meet the continuous enrollment test, the issuer must enroll subject to binder.	021 (Addition)	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 (issuer must collect binder but because of timing issues the future year policy is already effectuated in the FFE)	I834

2020 OE Transaction Summary

Active Re-enrollments After an Enrollee was BAR'd

Scenario	Type Code	Maintenance Reason Code (Sent & Received)	Origin Type (≠11)	AMRC	Issuer Confirms Effectuation	EFT Functional Code
8) Active re-enrollments of effectuated policies, **post-BAR, income change reported (Same subscriber and QHP ID)** *For active re-enrollments 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
9) Active re-enrollment with new subscriber (treated the same as a new enrollment) *If the active re-enrollment takes place post-BAR, the issuer of previous auto re-enrollment 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
10) Active re-enrollment in a different 14 digit QHP ID *If the active re-enrollment takes place post-BAR, the issuer of previous auto re-enrollment 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

2020 OE Transaction Summary

BAR/Auto Re-enrollments & Alternate Enrollments

Scenario	Type Code	Maintenance Reason Code (Sent & Received)	Origin Type (≠11)	AMRC	Issuer Confirms Effectuation?	EFT Functional Code
11) Active re-enrollments 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
12) Active re-enrollments 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.)	ACTIVEREEN ROLL - INITIAL	Yes	I834
13) New active enrollment (not a re-enrollment)	021 (Addition)	Sent by FFM: EC Returned to FFM by Issuer: 28	1, 2, 3, etc. (FFM Online, etc.)	N/A	Yes	I834

2020 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 Data Matching Issues (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 Re-enrollment and National Producer Number (NPN)

Illustration of when NPN identifying an agent or broker will be carried forward by BAR or active re-enrollment (no changes for 2020)

NPN Scenarios	NPN on Current Year Application or Enrollment	NPN Sent on 1000c Loop on Next Y Enrollment Transaction
Auto re-enrolled (passive) consumer with FFM Policy associated with NPN before BAR begins	123	123
Auto re-enrolled (passive) consumer with no NPN on policy at the time of auto re-enrollment; 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 re-enrollment 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 re-enrollment 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 re-enrollment process.