

# Overview of Federally-Facilitated Marketplace Special Enrollment Periods and Plan Category Restrictions

*October 2018*



# Agenda

- Special Enrollment Period Overview
- Plan Category Restrictions Overview
- Takeaways for Open Enrollment
- Examples

Note: Information throughout this presentation is relevant for our stakeholders helping consumers in the Federally-facilitated Marketplace and states that use the federal platform (i.e. HealthCare.gov). It doesn't apply to states that are operating their own Marketplace platforms.

# Special Enrollment Period (SEP) Overview

- Special Enrollment Periods (SEPs) provide an opportunity to individuals who experience certain qualifying events to enroll in or change their health coverage outside of the annual Open Enrollment Period.
- SEP qualifying events fall into six categories:
  - Loss of qualifying health coverage
  - Change in household size
  - Change in primary place of living
  - Change in eligibility for Marketplace coverage or help paying for coverage
  - Enrollment or plan error
  - Other situations
- SEP eligibility may depend on the consumer's prior coverage status, or the submission of documents to confirm eligibility. Coverage start dates may vary.
- For more information on SEP qualifying events, see:

Fact Sheet: <https://marketplace.cms.gov/outreach-and-education/special-enrollment-periods-available-to-consumers.pdf>; and  
Webinar Slides: <https://marketplace.cms.gov/technical-assistance-resources/sep-overview-slides-7-11-2018.pdf>

# Plan Category Restrictions Overview

- ***What is a plan category?*** Health plans sold in the Marketplace are divided into 4 categories: Bronze, Silver, Gold, and Platinum. They range from Bronze plans, which have lower premiums and higher out of pocket costs, to Platinum plans, which have higher premiums and lower out of pocket costs.

To learn more about plan categories, see:

<https://www.healthcare.gov/choose-a-plan/plans-categories/>

- ***When do restrictions apply to the plan categories that consumers can choose from?*** Beginning in early 2019, Marketplace consumers may have a restricted range of plan categories to choose from (instead of all 4) during their SEP window. This impacts consumers when they:
  - Currently have a Marketplace plan,
  - Experience certain SEP-qualifying life events, and
  - Want to change from their current plan.

# Plan Category Restrictions Overview (continued)

## ➤ *Who is subject to a plan category restriction?*

- Consumers and their dependents who qualify for certain SEPs and are already enrolled in Marketplace coverage.
- Newly added household members whose family is already enrolled in Marketplace coverage, and who want to enroll in the same plan with their family.

## ➤ *Which SEPs are subject to plan category restrictions?*

- Most common SEP types, like a loss of qualifying coverage, change in primary place of living, or change in household size.
- For most SEP types subject to restrictions, existing enrollees will generally only be able to choose from plans within the same plan category as their current plan. For example, someone who's already enrolled in a Bronze plan (and wants to change plans) will only view and choose Bronze category plans.

# Plan Category Restrictions Overview (continued)

- ***What about existing enrollees who become newly eligible for cost-sharing reductions (CSR)?***
  - Marketplace enrollees who become newly eligible for CSR – and who aren't already enrolled in a Silver plan – can change to a Silver plan so they can use their CSR.
  - For more information on CSR, see: <https://www.healthcare.gov/glossary/cost-sharing-reduction/>
- ***What about existing enrollees who gain dependents due to marriage, birth, adoption, foster care, or court order?***
  - To enroll in coverage together, existing enrollees must add any new household members to their current plan and generally can't change plans. Alternately, consumers can choose to place the new dependent in their own group and enroll the new household member in any plan for the remainder of the year.
- ***What if an existing enrollee can't add new household members to their current plan?***
  - If a plan's business rules prevent an existing enrollee from adding a new household member, the family can enroll together in a different plan in the same category. If no other plans are available in this category, the family can enroll together in a category that's one level up or one level down.

# Plan Category Restrictions Overview (continued)

## ➤ *Which SEPs are not subject to plan category restrictions?*

- Some SEPs, like those due to misrepresentation or plan display error, and gaining or maintaining status as a member of a federally recognized tribe or Alaska Native Claim Settlement Act (ANSCA) Corporation shareholder, or other very rare situations, don't limit consumers' ability to choose a new plan during a SEP window, if they want a different one.

## ➤ *What about consumers newly enrolling in Marketplace coverage?*

- Consumers newly enrolling in Marketplace coverage aren't limited in the plans they can choose to enroll in.
- However, these consumers may have to submit documents to confirm information about their eligibility for a SEP. For more information, see:
  - <https://www.healthcare.gov/coverage-outside-open-enrollment/confirm-special-enrollment-period/>
  - <https://marketplace.cms.gov/technical-assistance-resources/pre-enrollment-verification-overview.pdf> (starting on slide 43).

# Takeaways for Open Enrollment

- During Open Enrollment, consumers can newly enroll in Marketplace coverage or renew their Marketplace coverage and choose their existing plan or a new plan for the next year.
- SEPs provide an opportunity to newly enroll in or change coverage outside of Open Enrollment. **However**, starting in early 2019, most existing Marketplace enrollees who qualify for a SEP won't be able to change to a different plan category if they don't want to keep their current plan.
- You can help consumers understand that their plan choices after Open Enrollment will likely be limited later in the year, even if they qualify for a SEP and want to change plans. You can encourage them to choose a plan that will meet their needs and their family's needs until the next Open Enrollment.
- **Tip:** Use this HealthCare.gov page to help consumers understand plan categories - <https://www.healthcare.gov/choose-a-plan/plans-categories/> and choose the coverage that's best for them.

## Example 1: Current enrollee qualifies for a SEP with limited plan choices

**Example 1:** David, Leah, and their three children are enrolled together in a Gold plan.

- On March 3, the family moves from Springfield, IL to Chicago.
- The family reports their move on March 10, and they qualify for a SEP due to a change in primary place of living.
- The family can stay in their current plan, or change to another plan in the same category as their current Gold plan.
- When confirming the coverage they want (their current plan or a new Gold plan), the family's results will show only Gold plans.
- The family changes to another Gold plan on March 11, and their new coverage starts on April 1.

## Example 2: Current enrollees add a new dependent through a SEP with limited category choices

**Example 2:** David, Leah, and their three children are enrolled together in a Bronze plan. On June 22, the family adopts a baby, Alex.

- David and Leah add Alex to their application on June 30.
- They can add Alex to their family's current Bronze plan by keeping him in the same enrollment group. Or they can group Alex separately so they can choose from all plans (any category) for his coverage for the rest of the year.
- On July 3, David and Leah enroll Alex separately in a Platinum plan. Alex's coverage starts retroactively, as of June 22, based on his adoption date.

## Example 3: Current enrollees qualifying for a SEP with a limited ability to change plans

**Example 3:** Tanya is currently enrolled in a Silver plan. On April 17, she marries Charles.

- Tanya adds Charles to her application on April 25, and reports that they were married on April 17.
- Tanya is a current enrollee, so she can't change her current plan. Tanya can group Charles with her to enroll in her existing Silver plan together. Or she can group Charles separately and can choose from all plans (any category) for his coverage for the rest of the year.
- Tanya and Charles decide to include him with Tanya and enroll together in her Silver plan. Their coverage begins May 1.

## **Example 4: Current enrollees in different plans qualifying for a SEP where their ability to change plans is limited**

**Example 4:** David and Leah are enrolled together in a Gold plan. Their daughter, Annie, is enrolled in her own Silver plan, and David and Leah's two other children, Dan and Amy, are enrolled together in a separate Silverplan.

- On July 13, the family of five moves from one part of Virginia to another, and thus qualify for a SEP due to a change in their primary place of living.
- The family members can each select from any plan within their current categories – Gold for David and Leah; Silver for Annie, and Silver for Dan and Amy.
- On July 22, David and Leah report their move and enroll together in a new Gold plan. They enroll Annie, Dan and Amy together in a Silver plan, which they are able to do because all three children were previously enrolled in Silver plans. The family's new coverage will be effective September 1.