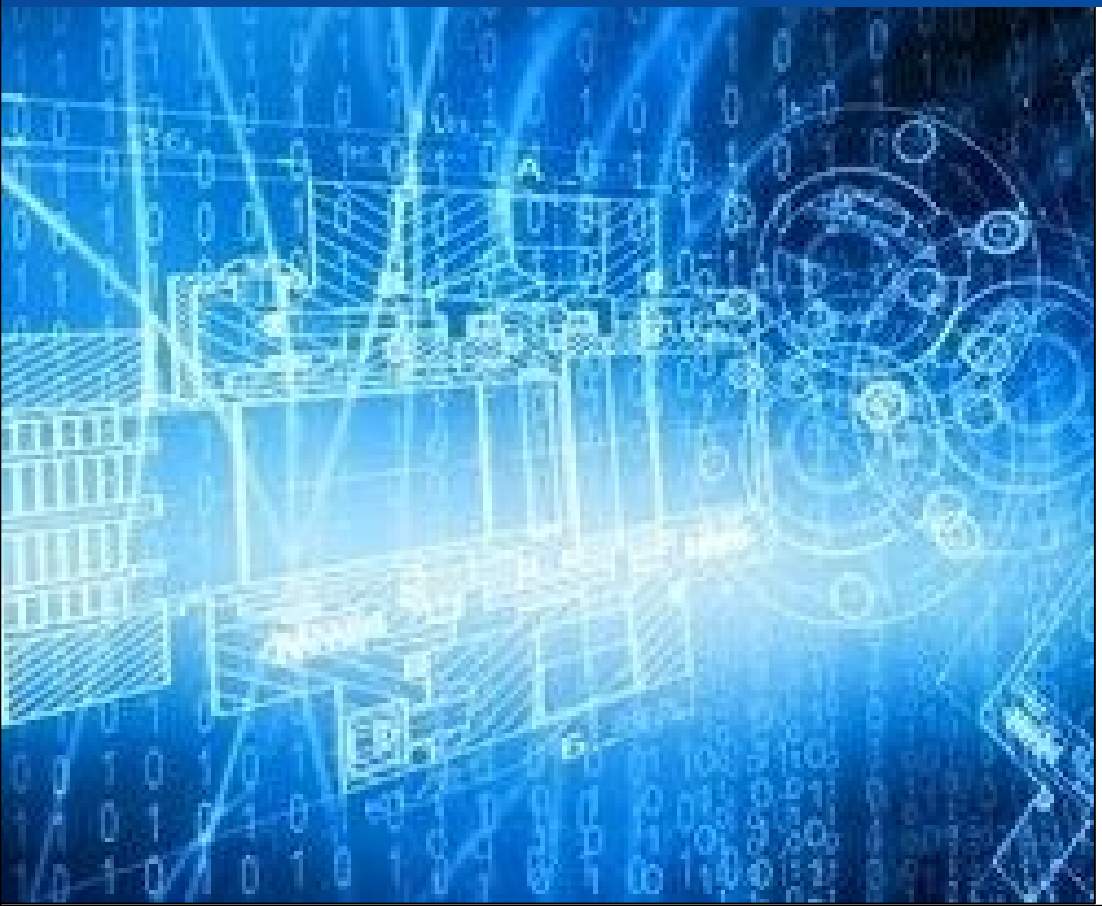
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Special Enrollment Period (SEP) for Small Population Where Social Security Number (SSN) was Updated Through Offline Process



Center for Consumer Information and Insurance Oversight (CCIIO)

February 5, 2018

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

Special Enrollment Period (SEP) for Small Population Where Social Security Number (SSN) was Updated Through Offline Process

Background

- Enrollees with Data Matching Issues (DMI) for Social Security Number (SSN) can submit documentation to the Marketplace. When sufficient documentation is provided, the Marketplace may use offline functionality to update the SSN.
- Between October 2017 and January 2018, a bug in eligibility logic created a data condition such that when the update SSN functionality was used on an affected application, advance payments of the premium tax credit (APTC) was unintentionally removed.
- This issue affected a very small number of consumers. Upon discovery of the bug, we discontinued use of the update SSN functionality for affected consumers. The bug that leads to the problematic data condition is scheduled to be corrected in a FFM maintenance release in mid-March.

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Special Enrollment Period (SEP) for Small Population Where Social Security Number (SSN) was Updated Through Offline Process, continued

- Impacted consumers need to update their application and report a Change - in - Circumstance (CiC) to regenerate their APTC. This action will generate an updated (Eligibility Determination Notice (EDN) to be sent to the consumer.
- The Marketplace will be conducting outbound calling outreach to the very small number of affected consumers in order to offer a CiC, and so that a Category 2 Health Insurance Casework System (HICS) escalation case is created instructing issuers to apply the APTC retroactively due to Marketplace error.
- Due to the very small number of affected consumers, not all issuers have impacted consumers and may therefore not receive HICS cases related to this defect. An issuer that doesn't have HICS cases with the special language noted in this presentation does not have any impacted enrollees. In addition, the help desk has a list of issuers who are receiving cases, though no action is required by the issuer.

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Issuer Action

- After reporting a CiC, FFM Call Center Representatives will send a Category 2 HICS case to issuers with sub-category "Special Enrollment Period (Issuer Action Required)."
- New HICS language has been created and will be implemented to clearly point issuers to this issue and what action is required to correct the consumer's enrollment record.
- The HICS language will indicate:
  - *Consumer impacted by an SSN Marketplace defect that caused their APTC to be incorrectly removed. The Marketplace has verified that the consumer qualifies for retroactive APTC to be applied effective XX. Per CMS guidance related to Marketplace errors, make the updates in your system and then submit changes to the Marketplace through the ER&R process.*

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