

Direct Enrollment Special Enrollment Periods (SEP) - FAQ



*Draft Version as of June 2, 2015
(Will update this date and
version as we grow the FAQ and
make updates; Q&A session to be
held on June 9, 2015.)*

FAQ 1 of 5

- Q: Will the Direct Enrollment API Spec be updated to reflect the changes that are coming for SEP?
 - A: Yes, update API spec is available on zONE – **See** API Updates Slide
- Q: What are some of the changes for the Direct Enrollment API Spec?
 - A: SEP reason code will be coming through as a 2 digit number instead of a string (**Note:** Issuers may want to update their schemas)
 - A: Code for DE SEP
 - A: API Spec will be applicable for Web Brokers too
- Q: Do Issuers have to send in the period type in the Enrollment API and if so do we have to accompany this information with a SEP reason code
 - A: Yes, Issuers have to accompany the period type with an SEP reason code

FAQ 2 of 5

- How will Effective Dates be applied for DE SEP?
 - A: FFM will provide the Effective Dates based on the application date and qualifying life event (*see* slides at the end of the FAQ for a list of qualifying life events)
- What are some examples of how Effective Dates will be determined?
 - A: Normal Date – Consumer or Agent/Broker enrolls for 2016 coverage before 12-15-2015 and reports that they were just married. The effective date for a marriage SEP will be the first of the following month.
 - A: Accelerated Date– Consumer or Agent/Broker enrolls for 2016 coverage before 12-15-2015, but reports a future loss of MEC on 1/25/2016. The effective date will reflect the first of the following month, so in this case 2/1/2016.
 - **Note:** that the latest QHP effective date will be null and the earliest effective date should be used on the partner side.
 - A: Retroactive Date– Consumer or Agent/Broker enrolls for 2016 coverage on 2-15-2016, but reports that they either had a newborn or adopted a child on 1/5/2016 . The effective date will retroactively reflect this date for all members.
 - **Note:** that the latest QHP effective date will be null and the earliest effective date should be used on the partner side.
 - A: Not SEP Eligible– Consumer or Agent/Broker enrolls for 2016 coverage on 1-16-2016, and is not eligible for a SEP.
 - **Note:** that the latest QHP effective date will be populated but treat it as a null value and the earliest effective date should be used on the partner side.

FAQ 3 of 5

- Do the consumers have the option to select one from a possible set of effective dates?
 - A: No, FFM will select the earliest Effective Date of the potential multiple effective dates available
- If consumers want to change their effective dates can they?
 - A: Consumers will need to contact the Marketplace Call Center to determine if it is possible for their situation
- Will consumers in the future be able to select effective dates?
 - A: CMS is evaluating this change but no timeline for it has been determined
- What will happen if Issuers try to use a date besides the earliest effective date in the SEP node?
 - A: Submit enrollment will error out
- Will there be any change in the Fetch Eligibility XML schema related to the SEP support?
 - A: No other changes beyond SEP reason code have been the FFM XML schema

FAQ 4 of 5

- Does an SEP require a NEW Application for Subsidy or do you use your existing Application?
 - A: Individuals should only create one application for a given coverage year (i.e. 2015). If an individual needs to report a life change, they should update their application through CiC, including financial changes, and that application will be versioned. The first version can result in a person being eligible for a SEP and why DE will be able to support SEP outside of OE. Since DE can only support an application version of 1 this summer, it is only available for new enrollees. Those who already have an application should come back to the Marketplace to report a change.
- When will SEP be available on IMP1A?
 - A: Mid-June pending internal testing results.
- Will everyone have access on IMP1A to test the SEP when is ready for testing or we should be part of an "alpha testers" team?
 - A: yes, once the testing dates are announced they can test
- We have had general issues getting support through web broker email; are there some other contacts we can use for technical questions?
 - A: Please utilize the CMS Help Desk, CMS_FEPS, CMS_FEPS@cms.hhs.gov for all Issues **Note:** If have policy questions please indicate this in your submission

FAQ 5 of 5

- Will issuers have a choice of supporting only open enrollment via DE or will SEP be required if doing DE?
 - A: Issuers will have a choice on whether they will support it and when they would like to begin supporting it.
- Q: For DE SEP – Will eligibility tell us whether it is a CiC or a new SEP?
 - A: The Fetch Eligibility response will indicate if there is a SEP or not. CiC is not supported through DE.
- Q: If the SEP indicator is “N”, then we can assume that they’re either truly not eligible for a SEP or that they’re an existing application?
 - A: Correct.
- Q: Will DE SEP work for both the consumer and Agent/Broker channels?
 - A: Yes, both channels will support DE SEPs on initial applications.
- Q: Will premium calculations for SEP eligible applications differ from how they are handled in Open Enrollment?
 - A: No, they will be calculated exactly the same. The premium calculation will be based on the effective date that is provided in the Fetch Eligibility response, which is the earliest effective date tag. This effective date will be used to determine the age of the applicants.

SEP Qualifying Life Events

SEP Conditions	Consumer action
Loss of minimum essential coverage (MEC)	Consumer attests to losing MEC in the past or in the future
Marriage	Consumer attests to recently getting Married
American Indian/Alaskan Native tribal affiliation	Consumer attests to being an American Indian/Alaskan Native
Birth of a child	Consumer adds an applicant who how was born in the last 60 days
Acquired eligible immigration status	Consumer attests to recently gaining eligible immigration status
Placement for adoption	Consumer attests to adopting a child
Relocation	Consumer attests to recently moving

SEP Qualifying Life Events

SEP Conditions	Consumer Action
Release from incarceration	Consumer attests to recently being released from jail
State Medicaid revocation	Consumer attests to recently being denied Medicaid
Exceptional Circumstances/ HHS SEP	Call Center Representative grants a SEP
Previous year tax penalty	Consumer attests to not being aware of the tax penalty

API Spec

Section	Change Description	Page
Introduction	Remove reference to lead generation API	1
Key Considerations	Clarify consideration 6 to describe Agents and Brokers functionality. Their workflow is different than consumers and includes the use of a landing page.	7
Key Considerations	Add a consideration similar to 11 that recognizes that agents and brokers will also need to maintain both usernames and passwords	8
System Access and Workflow	Correct sentence that “When an Agent of Broker tries to look up an existing FFM consumer, they would need to provide responses (obtained from the consumer) to Assister Authorization Questions for the FFM to validate that the Agent or Broker has the consumer’s authorization to access their account.” This is not accurate as the AB does not need to provide any responses.	11
System Access and Workflow	Correct how ABs access consumer accounts. This sentence is incorrect: “Once the association is established the Agent/ Broker will be able to access the consumers account till the consumer explicitly removes the association or associates with a different Agent or Broker.”	11

API Spec

Section	Change Description	Page
API Interaction Scenarios	Remove Scenario #1c as lead generation is not supported.	14
List of API Interfaces	Edit references to include consumers and ABs	16
Connectivity Pre-requisites	This section should also include the process for web brokers. Web brokers should contact CCIIO via webbroker@cms.hhs.gov to initiate the process for being certified as web brokers. The statement, 'The companion document titled "Federal Data Services Hub (DSH) - Requester Onboarding Summary Document" outlines the protocol for interacting with the Hub including onboarding requirements' only applies to issuers.	18
6.2.3 Web Services Interaction	Suggest updating the reference in this section to the end to end implementation guide.	20
6.3.1.1 Transfer User	Remove lead generation from transfer type and remove lead generation data group	23

API Spec

Section	Change Description	Page
6.3.1.2	Provide full list of error responses	29
6.3.2 Transfer User Back	Remove reference to lead generation.	31
7.3.1.3 Fetch Eligibility	Include column that provides the specific tags or reference the XML mapping document between fields and the actual tags.	43
7.3.1.3 Fetch Eligibility	Provide XML example message and mapping similar to secure redirect examples above	44
7.3.1.4 Fetch Eligibility Response	Provide XML tag column or mapping table reference.	44
7.3.1.4 Fetch Eligibility Response	Provide XML example message and mapping similar to secure redirect examples above	64
7.3.2.3 Submit Enrollment Request	Provide XML mapping / tags to actual message	74

API Spec

Section	Change Description	Page
7.3.2.3 Submit Enrollment Request	Provide note that SEPs and CICs are not yet available.	81
7.3.2.3 Submit Enrollment Request	Provide XML example message and mapping	83
7.3.2.4 Submit Enrollment Response	Provide XML mapping / tags to actual message	83
7.3.2.4 Submit Enrollment Response	Provide XML example message and mapping	88
B.3.1	Suggest removing lead generation scenario	103