

Batch Auto Reenrollment (BAR) and Open Enrollment (OE)

Center for Consumer Information & Insurance Oversight (CCIIO)

November 14, 2022

<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. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.

This communication was printed, published, or produced and disseminated at U.S. taxpayer expense.

Beginning of 2023 Open Enrollment



- PY 2023 Open Enrollment began on Tuesday, November 1, 2022 and ends on Sunday, January 15, 2023
- Issuers should encourage consumer to update their application to obtain final plan pricing for 2023 coverage.
- Marketplace coverage will start according to the date a plan is selected:

Date of plan selection for 2023 coverage	Coverage effective date
November 1 – December 15	January 1
December 16 – January 15	February 1

BAR Update



- The October BAR wave concluded on 10/31 for all states for enrollments active in the FFE as of 10/1
- As a reminder, BAR enrollments are not visible to consumers online until after the open enrollment period has ended, and only then for consumers who did not actively select a plan during OE
- As a reminder, issuers can view BAR policies in SEED

BAR Incremental Wave



- An early incremental wave was run in FL and TX on 11/08
- The BAR progress report is now paused as the early incremental wave in FL and TX is complete
- The next BAR incremental wave is scheduled to run on 11/29
- The Incremental BAR wave will auto-reenroll any new current year enrollments created since BAR began, and carry forward updates to already-BAR'd current year policies to BAR policies still in passive status

BAR Outreach File



- CMS sent the IOUTRC (Outreach) file to issuers on 10/07
- These consumers are at risk of losing Financial Assistance if they do not return to the Marketplace
- Issuer should conduct voluntary outreach and encourage consumers to return to the Marketplace
- CMS also sent an additional incremental IOUTRC (Outreach) file to issuers on 10/25

BAR Reminders for 834 Processing Teams:



- The BAR Progress Report contains the count of alternate enrollments as of 6PM ET the previous day report is sent. For example, the report sent on 10/25 will report on data through 6PM ET of the day before 10/24
- Issuers can differentiate/identify "alternate enrollments" as follows: For alternate enrollments (row 1 from the table), the AMRC is "PASSIVE REENROLL --NEW TO ISSUER" with EFT functional code I834. (Brand new enrollment otherwise doesn't have that code.)
- A helpful refresher guide on BAR transactions is the "OE Transaction Summary", which gives examples of different BAR auto-reenrollments/alternate enrollments and the corresponding AMRC/EFT codes (slides 15-18). https://regtap.cms.gov/reg_librarye.php?i=4027

Switch File



- Issuers should have started receiving the Switch file starting 11/02.
- The 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
 - **Delivery Date:** Daily from 11/02 to 12/16
 - **Delivery Code/Layout:** SWTFL

Missing “BAR” Transactions



We encourage issuers to review the criteria below before opening a ticket with the Marketplace Service Desk.

- Compare 2023 subscribers with 2022 subscribers using the FFE Member ID and other unique identifiers. In rare circumstances, the subscriber might change, but the FFE Member ID will remain the same.
- 2023 Enrollments created after October 1st will not be BARed until the incremental BAR wave.
- To be eligible for BAR, an enrollment must show as current in the FFE. Check the most recent Pre-Audit File or in SEED to verify if the policy shows current with the FFE.
- If issuers still have concerns that an auto re-enrollment was not received, please open a ticket with CMS_FEPS@cms.hhs.gov and include 3-5 sample 2023 application/enrollment identifiers that have not been auto-renewed with an explanation of the concern.

- When an issuer identifies a Passive Reenrollment and an Active Selection for the same consumer, the issuer should enroll the active selection and cancel the passive.
- **Options:**
 - Wait for the FFE Passive Cancel Job to run (check BARCN3 file for the passive cancellation)
 - **Delivery Date:** 11/18, 11/23, 12/2, and 12/21
 - **Delivery Code/Layout:** EFT BARCN3 jobs (IPA layout)
 - Send a regular Cancel via IC834 at anytime for the passive reenrollment

Unwanted BAR Cancellations



- As a reminder, issuers are required to process cancellation requests received from an enrollee for enrollments that are still in a passive status (policy origin = 11).
- There is no limit on how long enrollees have to request the cancellation, and they do not need to be referred to the Marketplace Call Center.
- Issuers should report such cancellations via IC834 or monthly reconciliation.

Cancel Carry Forward Job



- **Description:** Will cancel auto-reenrollments that are subsequently ineligible for BAR due to late terminations of current year Marketplace coverage. Active reenrollments or auto-reenrollments that have been updated by the enrollee will NOT be cancelled in this job, though in some scenarios the issuer may still cancel the active reenrollment
- See Exchange Enrollment Manual, Chapter 6:
https://regtap.cms.gov/reg_librarye.php?i=1761
 - **Delivery Date:** Intermittent 11/29 and 12/15+, then twice monthly January thru March
 - **Delivery Code/Layout:** Delivered to issuers via EFT I834's with AMRC CANCEL-CARRYFORWARD

CIC Carry Forward



- **Description:** Carries forward to the future year enrollment changes effective after BAR
 - **Delivery Date:** 11/29, 12/5, 12/16+
 - **Delivery Code/Layout:** Sent as AMRC of CANCELCIC to be consistent with M834 operational guidance (instead of CANCEL-CARRYFORWARD).