

# Batch Auto Reenrollment (BAR) Update

*Center for Consumer  
Information & Insurance  
Oversight (CCIIO)*

*October 28, 2019*

<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.*

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

# BAR Update

- 2020 BAR transactions have substantially finished for 2019 enrollments current as of October 11, 2019, in all FFE states.
- CMS has been running a small “clean-up” population since 10/25. Issuers in all states may receive BAR transactions with their 6pm aggregate. This clean-up is expected to continue throughout the week.

# “Missing BAR” Transactions

- We encourage issuers to review the below criteria before opening a ticket with the Marketplace Service Desk.
  - Consider the “deprioritized” population (tobacco, multiple residential addresses, BAR SES Clean-up), which will be run later in BAR season.
  - Compare 2020 subscribers with 2019 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.
  - 2019 Enrollments created after October 6<sup>th</sup> 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 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](mailto:CMS_FEPS@cms.hhs.gov) and include 3-5 sample 2019 application/enrollment identifiers that have not been auto renewed with an explanation of the concern.

# Passive Cancels

## Passive Cancels

- **Description:** Will cancel passive reenrollments that duplicate active enrollments for future year Marketplace coverage.
- If enrollees or their assisters create a duplicate enrollment via a disconnected application, the Marketplace will cancel the passive enrollment
  - **Delivery Date:** 11/20, 11/27, 12/4, and 12/10.
  - **Delivery Code/Layout:** EFT BARCNO jobs (IPA layout)
- Issuers may alternatively send a IC834 cancel on the duplicate 2020 passive rather than waiting for the BARCNO job

# Passive BAR and Active Selection

- When an issuer identifies a Passive Reenrollment and an Active Selection for the same consumer, the issuer should enroll the active selection and work to cancel the passive. Options:
  - Wait for the FFE Passive Cancel Job to run (check BARCNO file for the passive cancelation)
  - Send a regular Cancel via IC834 at anytime for the passive reenrollment

# Cancel Carry Forward

- **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)
  - **Delivery Date:** Intermittent 12/2 and 12/16+, then 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:** 12/2, 12/16
  - **Delivery Code/Layout:** Sent as an Additional Maintenance Reason Code (AMRC) of CANCELCIC to be consistent with M834 operational guidance (instead of CANCEL-CARRYFORWARD).

# Missing Outbound Incremental Pre-Audit File Delivery

- **Description:** 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 including BAR that failed to convey successfully to the Issuer during the period covered by the ISUIPA.
  - **Delivery Dates:** 11/5, 11/19, 11/26, and 12/10
  - **Delivery File/Layout:** MOIPA0
- BAR policies created but not sent as 834s will also show up on a MOIPA



# 2020 Open Enrollment Period HealthCare.gov Scheduled Maintenance Windows

Every year, CMS establishes scheduled maintenance windows that provide periods of time when CMS and its partners can make updates or resolve issues. Maintenance will only occur within these windows when deemed necessary to provide consumers with a better shopping experience. Consumer access to HealthCare.gov may be limited or restricted when this maintenance is required. The purpose in scheduling these times is to minimize any consumer disruption. Like other IT systems, these scheduled maintenance windows are how we update and improve our systems to run optimally and are the normal course of business.

**It is important to note that these times are the maximum scheduled potential windows when consumer access may be limited if maintenance is needed.** As it has been in the past, CMS anticipates the actual maintenance periods will be shorter while we work to minimize disruption for consumers

Potential/maximum scheduled HealthCare.gov maintenance windows for this upcoming Open Enrollment period are:

- Friday, November 1, 2019, early morning to make final preparations ahead of the start of the Open Enrollment period to ensure the website runs smoothly for consumers.
- Sundays, 12:00AM to 12:00PM (maximum time allotted), except on December 15, 2019

This year's scheduled maintenance windows are similar to last year's. Please note that due to a natural change in the calendar, this year's Open Enrollment period contains one more Sunday than last year's Open Enrollment period. As a result, there is one additional potential maintenance window scheduled for this year compared to previous years. CMS plans to continue working with agents, brokers, assisters, and states to ensure they have the information necessary to plan for Open Enrollment.