



Washington Health Benefit Exchange

SEPs, Eligibility, and Enrollment

Customer-Focused Stance

- Renewed focus on the customer/customer experience for 2019
- **Enroll** vs. not enroll
- Start coverage **earlier** vs. later
- We want our customers to be able to **use** their coverage



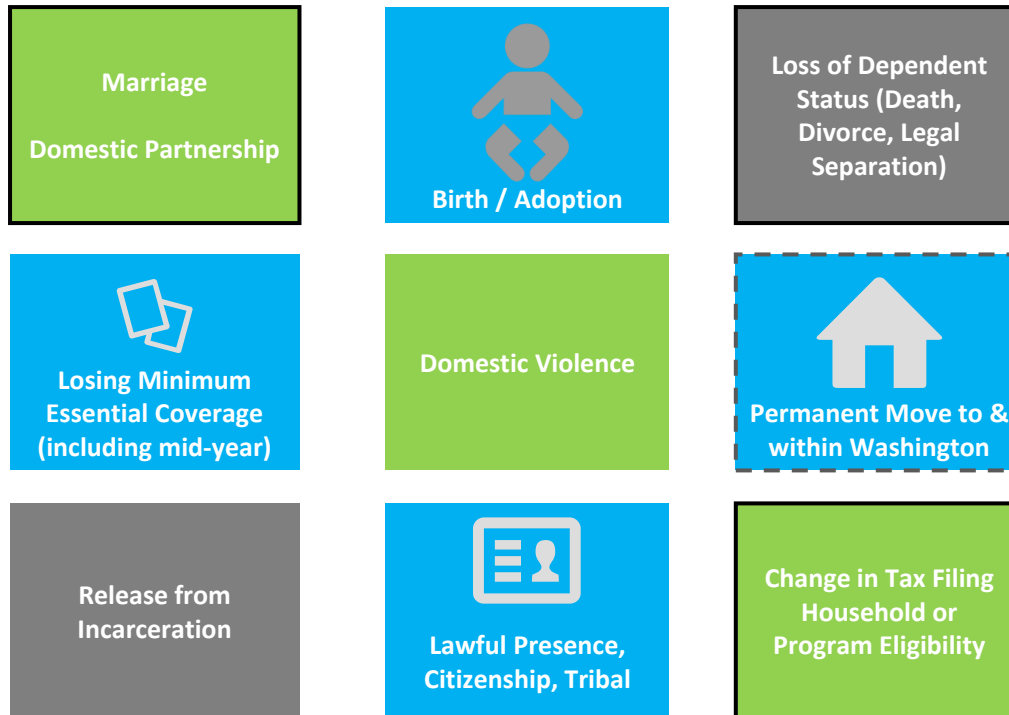
Special Enrollment Periods

- A Special Enrollment Period (SEP) is a time outside of Open Enrollment when a customer and their household may be eligible to sign up for or change their qualified health (and dental) coverage
- Applicants have 60 days from the date of a Qualifying Life Event (QLE) to make a plan selection
 - Advanced availability: loss of minimum essential coverage, move (release from incarceration)
- Start dates depend on the QLE and plan selection date
- **Important to report the correct QLE**
 - Start date
 - Types of documents requested
 - Shopping restrictions



Qualifying Life Events

System functionality will grant a customer a SEP when they report the following QLEs within 60 days:



The special conditions that qualify for special enrollment periods change from time to time due to federal and state policy changes, and may vary with complex scenarios (qualifying for more than one event)

Manual Special Enrollment Periods

- System will not automatically open SEP: move from a foreign country, customer does not report all applicable QLEs, application is not up-to-date
- Manually reopening a SEP if they are within 60 days of the QLE
- Exchange Error (file error, system defect, misinformation or inaction by an agent or employee of the Exchange)
- Carrier Misconduct
- Unresolved Casework
- Customer resolves Conditional Eligibility after 95-day deadline
- Exceptional Circumstances



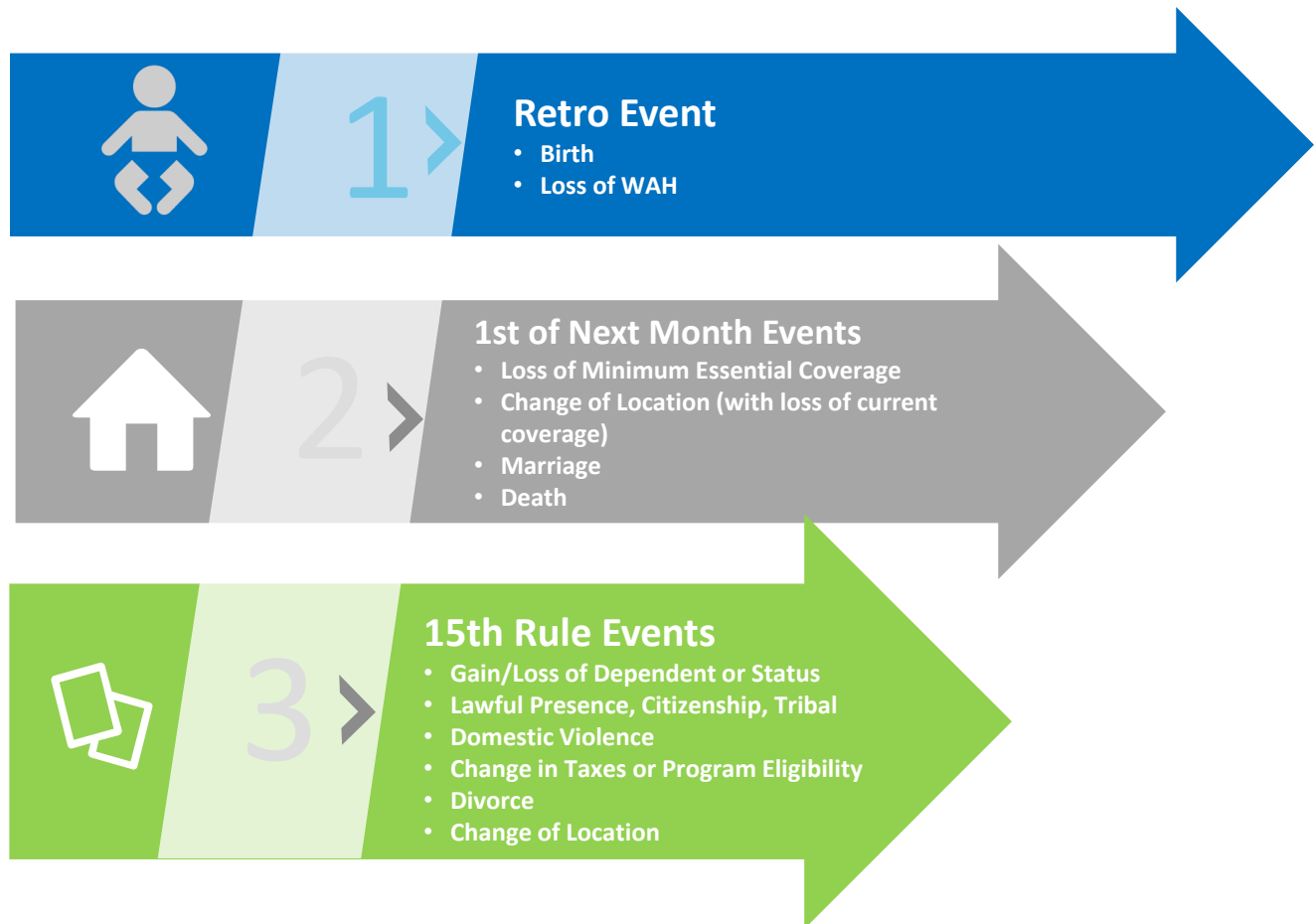
Exceptional Circumstances

- Customer regains tax credit eligibility after having been denied for *1 of 3 reasons*
- Natural disaster
- Hospitalization
- Customer sold fraudulent coverage and did not find out until after Open Enrollment or their SEP
- Customer was pending WAH during Open Enrollment or their SEP
- Other cases may be presented to Executive Leadership
- This is the only SEP that may require documentation from *Healthplanfinder*; everything else is self-attested and may be validated by the insurance carrier



Start Date Hierarchy

For customers reporting multiple qualifying life events, *Washington Healthplanfinder* will follow a hierarchy to determine the earliest possible start date for the customer



Eligibility vs. Enrollment

- Eligibility ≠ Enrollment
- Eligibility follows the 15th rule, enrollment follows QLE rules
- When a QLE allows for a retroactive start date or first of the month after plan selection, eligibility is usually updated in accordance with start date
 - Exception: December - depending on the QLE and date, a customer may be able to enroll in a QHP for December, but not receive APTC until January

Always review the *Plan Selection Confirmed* notice!



Documentation

- *Washington Healthplanfinder* accepts self attestation as documentation on the Special Enrollment Questionnaire form
- Individual Health Insurance Carriers may request additional proof of a customer's qualifying life event, and/or proof of prior coverage
 - If a carrier requests this from a customer – the customer should provide the documentation to their carrier directly
 - *Washington Healthplanfinder* may still request and require Conditional Eligibility documentation and this should be uploaded to the *Washington Healthplanfinder* **Document Center** Tab



Qualifying Life Event Documents

- Customers must submit documents *before* they can make their binding payment
 - Customer has 30 days to submit their documents
- Carrier must confirm SEP eligibility and the customer must make the binding payment before the customer can use their coverage
- When the customer delays sending documents or payment, their coverage start date does not change



QLE Documentation

- Acceptable documentation varies by insurance carrier
 - Typically provide list on their websites, and directly to the customer
- Loss of MEC
- Change in address
 - Must provide evidence of the old address and the new
- Birth, adoption, foster care, court order
- Marriage, domestic partnership, divorce, legal separation
- Change in Income (Change in CSR; APTC ↔ QHP)
 - Not all carriers require
 - Provide most recent *Eligibility Results*



No QLE Documentation

- Exchange Error
- Exceptional Circumstances
- Domestic Violence/Spousal Abandonment
- Reconciled taxes after being denied 1 of 3 reasons
- Tribal
- WAH to QHP
 - Unless reported as loss of MEC



Prior Coverage Requirement

Some SEPs require the applicant/household member have at least 1 day of MEC during the 60 days preceding the QLE

- Loss of MEC
- Marriage or Domestic Partnership
 - At least one applicant, does not have to be both
- Divorce or Legal Separation
- Death
- Change in Tax Filing Household
- Change in Program Eligibility (WAH, gain/loss of tax credits, change in Cost-Sharing Reduction tier)
- Change in Address (within an Exchange-covered region of the USA)
- Domestic Violence



No Prior Coverage Requirement

- Exchange Error, Carrier Misconduct, Unresolved Casework, Exceptional Circumstances
- Resolve Conditional Eligibility status after 95 days
- Change in lawful presence or citizenship status
- Enrolled member of a Federally-recognized tribe
- Birth, adoption, foster care, or court order
- Change in address (from a foreign country)
- Regained tax credit eligibility after being found ineligible for 1 of 3 reasons



Shopping Plan Restrictions

- Changes in federal regulations last year resulted in SEP plan restrictions
- Households will experience a unique shopping experience based on the qualifying life event reported
- Restrictions are based on the enrollee type
 - New (not currently enrolled): no restrictions
 - Existing (already enrolled): restrictions



QLEs with No Restrictions

- Tribal
- Error of the Exchange
- Exceptional Circumstances
- Regained tax credit eligibility after being found ineligible for 1 of 3 reasons
- CE Verification after 95-day deadline
- If not currently enrolled:
 - Loss of MEC
 - Birth, adoption, foster care, or court order
 - Lawful presence/citizenship
 - Marriage/domestic partnership



Metal Level Restrictions

- Dependent Addition: add to existing plan
 - Except if enrolled in Catastrophic → can move to bronze QHP
- Lawful presence/citizenship: same metal level
- Income change (change in CSR Tier or gain/loss of APTC)
 - Already in silver: same plan
 - Non-silver: can switch to silver
- Tax Filing Household (including divorce): same metal level



Customer-Focused Guidelines

- Broader Special Enrollment Period guidelines
 - Reopening SEPs when the customer is within 60 days of QLE
 - Reopening SEP when the customer attests to selecting the wrong plan within one month of plan selection
- Enrollment start dates
 - Generally will not approve a start date that is before the plan selection date
- Enrollment termination dates
 - Generally will not approve a termination date that is before the request date
- Requests to change enrollment dates must be requested via *Washington Healthplanfinder* Customer Support Center or your broker/navigator support teams

