



CONNECT FOR HEALTH COLORADO

Legislative Oversight Committee

August 24, 2016

FOLLOW-UP DISCUSSION ON PREVIOUSLY RAISED QUESTIONS

Special Enrollment Period (SEP)

A period of time outside of the open enrollment period that allows consumers who experience a Qualifying Life Change Event to shop for or switch plans.

- **Special Enrollment Periods:**
 - Can occur at any point in the year
 - Triggered by specific events
 - Usually give a person 60 days from the triggering event to take action



Types of SEP

Circumstance Changes

- Marriage or Civil Union
- Birth, adoption, placement for foster care or adoption
- Becoming a citizen, national, or lawfully present individual
- Permanent move in residence

Loss of Minimum Essential Coverage (MEC)

- Loss of eligibility for employer coverage, Medicaid, CHP+, COBRA expiration
- Loss of coverage due to divorce/legal separation, loss of dependent status (e.g., dependent turns 26), or death of policy holder
- An enrollee in an employer plan becomes newly eligible for subsidies because employer plan is no longer available, affordable, or adequate
 - Does not include voluntary termination of MEC

Other

- Error/inaction by the Marketplace, Broker/Agent, HCG, CAC
- Exceptional circumstances
- Special rule for American Indians and Alaska Natives

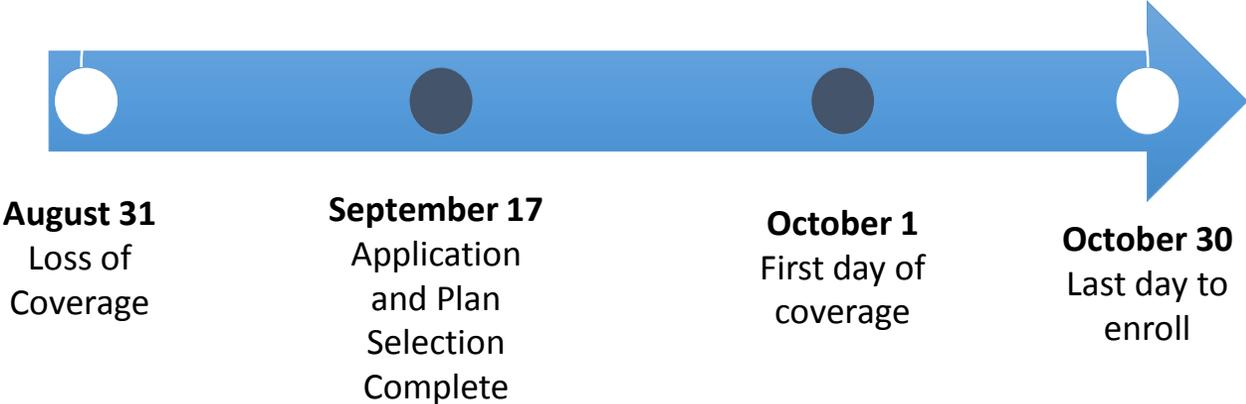
Example



Triggering Event = Loss of employer-sponsored coverage

Timing = Customer has 60 days from the triggering event to enroll in a plan with Connect for Health Colorado

SEP



What does not trigger a SEP?

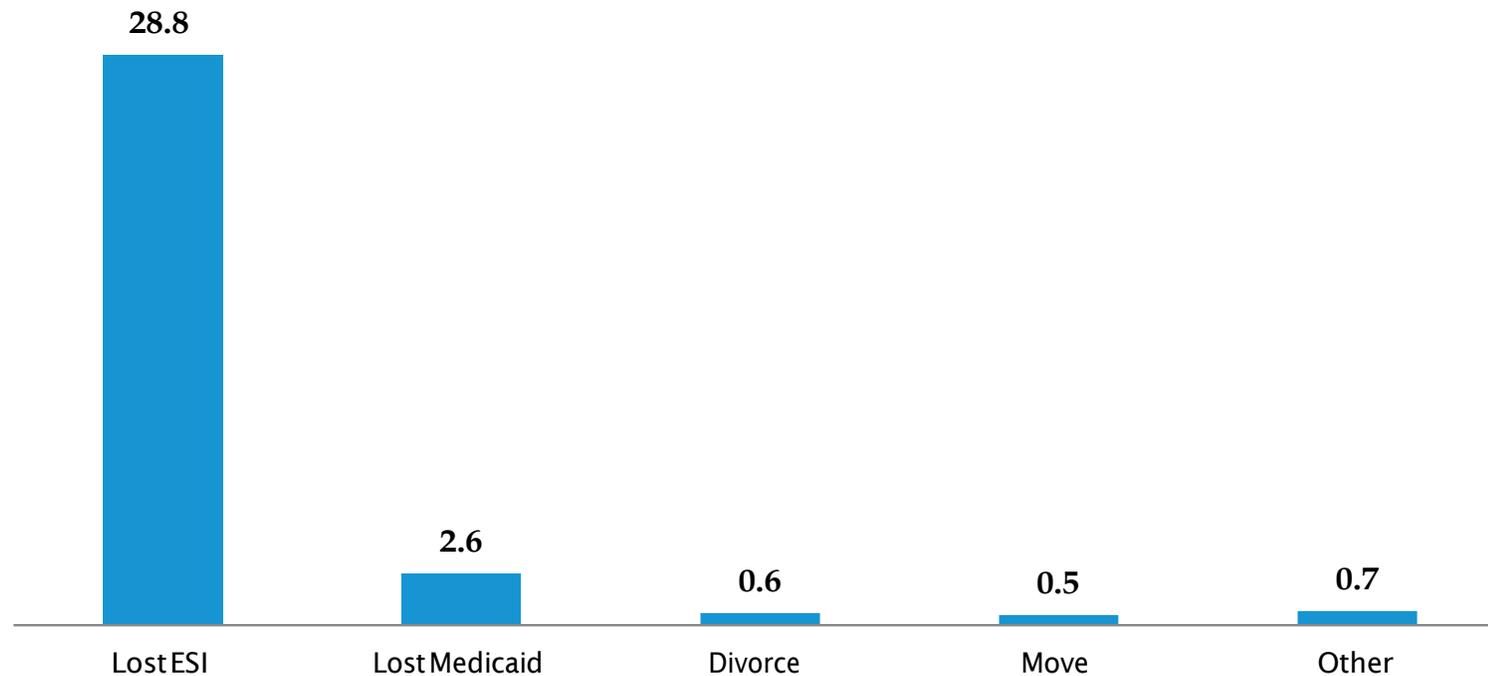
- Becoming newly eligible for APTC/CSR, unless enrolled in a plan through Connect for Health Colorado
- Voluntarily dropping other coverage (e.g., COBRA)
- Being terminated from other coverage for not paying premiums or for fraud
- Life change events that do not result in a loss of coverage, such as:
 - Change in income on its own
 - Loss of eligibility for coverage in which a person was not enrolled (i.e., loses job, but was not in the employer's health plan)
- Pregnancy
 - Currently NY is the only state with an SEP for pregnancy

SEP Verification

- There is a national discussion around whether the FFM and SBMs should verify SEPs beyond accepting attestation through the Marketplace
- This could include:
 - The Exchange obtaining documentation from all customers seeking an SEP, and verifying the information
 - The Exchange obtaining documentation from customers for a subset of SEPs, and verifying the information
 - FFM is doing this starting in 2017
 - Carriers obtaining documentation from all customers seeking an SEP, and verifying the information
 - Carriers obtaining documentation from customers for a subset of SEPs, and verifying the information
 - The Exchange verifying through a random sampling and auditing process

SEP Verification

SEP-Qualifying Reasons for Coverage Gaps between OEPs (millions of people per year)



Source: Buettgens, Dorn, and Recht (2015).

Note: ESI = employer-sponsored insurance; OEP = open enrollment period; SEP = special enrollment period. Sources of SEP eligibility in the “other” category include marriage, adding a child to the family, gaining citizenship, turning 26 and losing access to parental insurance, and qualifying for tax credits by moving from below to above the federal poverty level in a state that has not expanded Medicaid.

Source: [Urban Institute, June 2016](#)

SEP Verification

- Connect for Health Colorado is seeking feedback from carriers and stakeholders
- Stakeholder Engagement Timeline *(tentative, subject to change as needed)*
 - July – August: Board Policy Committee Discussion
 - July – August: Carrier Discussions *(ongoing as needed)*
 - August: Legislative Oversight Committee Discussion
 - September – October: Board Advisory Group Discussions
 - November – December: Additional Board Policy Committee Review
 - December – January: Full Board Review and Discussions

QUESTIONS?