Special Enrollment Periods

Affordable Care Act Basics: Part 6 of 8

BeWell
New Mexico's Health Insurance Marketplace

Introduction

Consumers may enroll in health insurance through BeWell using two enrollment periods. The Open Enrollment Period (OEP) is open November 1 – January 15 and Special Enrollment Periods (SEP) open for qualifying life events (QLE). Qualifying life events (sometimes called “qualifying life change events”) are changes in a consumer’s situation—like losing health coverage, getting married, or having a baby—that can make the consumer eligible for an SEP.

Main Topics

- Types of QLE
- SEP Timeframes
- Proof of SEP Eligibility
- SEP for Consumers with Low Incomes
- Reporting SEP

Types of Qualifying Life Events (1 of 5)

Types of QLE can include the following:

- 1) Changes in household:
  - Getting married
    - This SEP is only available if at least one spouse was enrolled in MEC at least one day in the 60 days before marriage.
  - Getting divorced
    - This SEP is only available to current enrollees.
    - If an individual is not currently enrolled but lost coverage during a separation, they can use the loss of minimum essential coverage (MEC) SEP.
  - Gaining a dependent through birth, adoption foster care placement, or court order.
    - Coverage can start from date of event.
  - Death
    - Other enrolled members must contact the BeWell Customer Engagement Center (CEC) if the person who died was the Head of Household (HOH).

Types of Qualifying Life Events (2 of 5)

- 2) Changes in residence:
  - Moving to a different ZIP code or county.
  - A student moving to or from the place they attend school.
  - A seasonal worker moving to or from the place they both live and work.
  - Moving to or from a shelter or other transitional housing.

Types of Qualifying Life Events (3 of 5)

- 3) Loss of MEC:
  - Losing existing health coverage, including job-based, individual, and student plans.
  - Losing eligibility for Medicare or Medicaid.
  - Turning 26 and losing coverage through a parent's plan.
    - **Note**: Consumers who turn 26-years-old during the coverage year will now be allowed to keep their coverage under their parents'/guardians' plan through the end of the coverage year. However, they can elect to take the SEP associated with their turning 26 in that coverage year.
  - **Note**: If a consumer loses coverage because they failed to pay their premiums, were involved in fraud, or voluntarily dropped coverage, an SEP is not available.

Types of Qualifying Life Events (4 of 5)

- 4) Other QLE:
  - Changes in income affecting the coverage or financial assistance the consumer qualifies for.
    - This includes newly gaining or losing tax credits entirely, losing cost-sharing reductions (CSR) entirely, changing the level of CSR the consumer is eligible for, or loss of Turquoise coverage.
  - Gaining membership in a federally recognized tribe or status as an Alaska Native Claims Settlement Act Corporation shareholder.
  - Becoming a U.S. citizen.
  - Leaving incarceration (jail or prison).
  - AmeriCorps members starting or ending their service.

Types of Qualifying Life Events (5 of 5)

- Other SEP may be available. If consumers believe they may be eligible for one of the SEP listed in this training or to check and see if they qualify for others, they should:
  - Contact the BeWell CEC or the BeWell Enrollment Page to learn more about SEP.

SEP Timeframes

- Unenrolled qualified individuals, current enrollees, and any dependent(s) can enroll in, or make changes, during a plan year within 60 days of the QLE (unless otherwise noted).
  - A QLE must be reported to BeWell within 60 days of the event to open a SEP.
  - Loss of MEC can be reported 60 days prior to the event or 60 days after.

Proof of SEP Eligibility

- BeWell may ask the consumer to submit additional documentation to prove the QLE.
- If the consumer needs to provide proof of their QLE, this will be listed on the eligibility results screen.

SEP for Consumers with Low Incomes (1 of 5)

- Available to current enrollees or those looking to enroll in Marketplace coverage for the first time.
- Eligible consumers can change plans once per month.
  - Consumers who change plans should be aware that deductibles and out-of-pocket costs will reset when the new plan starts.
  - **Note**: Due to current system constraints, if consumers want to change both their medical and dental plans in a month, they must contact the CEC for assistance.

SEP for Consumers with Low Incomes (2 of 5)

- New Mexico has implemented an SEP for consumers with incomes through 200% of the Federal Poverty Level (FPL).
- Consumers are eligible year-round to enroll in coverage through this SEP if:
    - Their household income does not exceed 200% of the FPL;
    - They are eligible for the premium tax credit (PTC); and
    - They are not eligible for Medicaid or other MEC.

SEP for Consumers with Low Incomes (3 of 5)

- Consumers must meet premium payment deadlines.
  - Coverage starts on the first day of the following month.
  - Binder payments (the first monthly payment) are due on the last day of the month prior to coverage taking effect, or within 7 days after requesting the enrollment, whichever is later.
  - Ongoing payments are due by the last day of the month before the month of coverage (e.g., for April coverage, the payment is due on March 31).

SEP for Consumers with Low Incomes (4 of 5)

BeWell New Mexico's Health Insurance Marketplace

- The application will automatically determine a consumer's eligibility for this SEP.
- Eligible consumers can submit a new application or update and resubmit an existing application.
- Consumers do not need to submit additional documentation to confirm their eligibility for this SEP.
  - However, if the income information from trusted data sources does not match the consumer's projected income, BeWell will ask the consumer to submit proof of income to ensure that the consumer receives the correct amount of PTC and savings.

SEP for Consumers with Low Incomes (5 of 5)

Consumers must be eligible for the PTC to take advantage of this SEP. This means that regardless of income, the SEP is not available to consumers who are eligible for Medicaid, premium-free Medicare Part A, or an employer-sponsored health plan that provides minimum value (MV) and is considered affordable.

SEP for Loss of Medicaid

BeWell has implemented an SEP specific to individuals who lose Medicaid coverage to enroll in a Marketplace plan ("Loss of Medicaid SEP"). BeWell implemented this SEP with the end of the Medicaid continuous coverage requirement; however, the SEP will be offered indefinitely.

Easy Enrollment SEP

- BeWell implemented an SEP in support of the Easy Enrollment Act (the "Act"). The Act allows New Mexico residents to check a box on their state income tax return giving consent for the state tax agency to share information to assess eligibility for coverage with the New Mexico Health Care Authority (HCA) and BeWell.
- HCA will assess eligibility and contact uninsured individuals to provide information about their coverage options, increasing accessibility for all participants.
- BeWell will provide an SEP for qualified individuals who indicate on their application that they 'checked the box' on their tax form – or would have checked the box, had they been offered the opportunity by their tax preparer.

SEP for Loss of Medicaid (Continued)

- Consumers can report a Medicaid coverage loss up to 60 days in advance. For consumers who attest to a future loss of Medicaid coverage, Marketplace coverage will be offered to start on the first day of the month after their last day of Medicaid coverage.
  - **Example**: On April 15, a consumer reports that their Medicaid coverage will end on May 31. The consumer's marketplace coverage can begin on June 1.
  - Consumers can choose a retroactive effective date of coverage, back to the first day of the month in which the consumer enrolls in a plan.
    - For example, if a consumer loses Medicaid on July 31, and selects a Marketplace plan on August 25, coverage can start on August 1.

Reporting a QLE

- Some QLE can be reported simply by updating the consumer's application. These include events like having income under 200% FPL, newly gaining or losing PTC/CSR, losing Medicaid, and changes to CSR level.
- Other events must be reported by completing the questionnaire on the eligibility results page to determine if the consumer can shop for coverage.
  - These include events like reporting a loss of MEC or a marriage.

Key Points

- SEP can occur throughout the year and are a result of QLE. QLE are changes in a consumers' situation (e.g., changes in household, loss of MEC).
- Unenrolled qualified individuals, current enrollees, and any dependent(s) can enroll in or make changes to their plan selection using an SEP within 60 days of the QLE (unless otherwise noted).
- Consumers must report QLE to BeWell.

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