Plan Year 2019 Special Enrollment Period

Validation & Enrollment Processes for Off-exchange Policies

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BEFORE WE BEGIN

Learning Objectives

After this training, you will be able to:

✓ Explain the Special Enrollment Period (SEP) validation process to your clients.
✓ Describe the SEP process for both online and paper applications.
✓ Understand the types of documents required for qualifying events.
✓ Support clients with discontinued 2018 QHPs and understand their options.
✓ Know how to affirm you completed this training.
✓ Access and utilize the supporting materials.
Notes About Applying for **On-exchange** Special Enrollment:

- Currently, if your client selects an on-exchange plan for special enrollment while using our Retail Shopping Cart or Retail Producer Portal, your client will be transferred to healthcare.gov to enroll.
- CMS validates SEP eligibility for life events including:
  - Permanent move
  - Loss of minimum essential coverage
  - Medicaid/CHIP denial
  - Adding a dependent due to marriage
  - Adding a dependent through adoption, foster care, child support or court order
- Submit on-exchange SEP documents to the Marketplace, *not BCBSIL*.
- For more on-exchange SEP information, see this [CMS resource on plan restrictions](#) and CMS’s [Resources for Agents and Brokers in the Health Insurance Marketplaces site](#).
- See CMS’s [Understanding Special Enrollment Periods](#) as a reference for consumers.

The following training is on special enrollment in BCBSIL **Off-exchange** QHPs.
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Applying for Special Enrollment
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Contacting SEP Applicants
Required Documents for SEP Life Events
Qualifying Life Event Examples
Reminders & Resources for Your Clients
Affirming Your Training (for existing and new producers)
Accessing SEP Materials
APPLYING FOR SPECIAL ENROLLMENT

Special Enrollment Period Definition and Rules
Overview of Changes for 2019
Enrollment Channel Overview
Applying via The Retail Shopping Cart
Applying via The Retail Producer Portal
Applying via Paper App: Submitting by Mail/Fax
Applying via Paper App: Uploading to the Retail Producer Portal
A Special Enrollment Period (SEP) is a time outside of open enrollment in which your client can sign up for health coverage or apply for a different plan due to a qualifying life event. An SEP is available year round for individuals who meet the criteria and apply within the event’s window (often, 60 days post event). Qualifying life events include:

- Marriage
- Birth or adoption of a child
- Losing job-based health care coverage
- Plan was discontinued by issuer/carrier

Consumers using a qualifying event to enroll can use that specific event once. If they experience a new qualifying event, they qualify for a new SEP.

The premium payment for the first month of coverage for a qualified health plan must be paid for an application to effectuate.

Once consumers effectuate coverage for their SEP, they can’t change their coverage even if they’re within their SEP window (i.e., 60 days after the event).
APPLYING FOR SPECIAL ENROLLMENT

Overview of changes for 2019

In all of our enrollment channels, qualifying events are now numbered, listed and organized in the same way. Also, several qualifying events now require proof of minimum essential coverage (MEC) for at least one day in the 60 calendar days prior to the event date. These life events are:

1. I and/or my dependent(s) lost MEC
2. I gained or became a dependent due to marriage
4. There was an error or violation regarding my previous enrollment
6. I gained access to new health plan options because of a permanent move

For events where proof of MEC for at least one day in the 60 calendar days prior to the event date is required, applicants may qualify for a hardship exemption. We will accept any hardship exemption that’s granted by the Marketplace. For details on applying for an exemption, see these CMS guidelines.
### Enrollment Channel Overview

<table>
<thead>
<tr>
<th><strong>ONLINE:</strong> Retail Producer Portal</th>
<th><strong>ONLINE:</strong> Retail Shopping Cart</th>
<th><strong>PAPER:</strong> Mail, Fax or Upload</th>
</tr>
</thead>
<tbody>
<tr>
<td>• You manage the entire application and submission process “end-to-end” via your Retail Producer Portal account</td>
<td>• Clients reach the Retail Shopping Cart via your Express Link or Quote Link; both come from your Retail Producer Portal account</td>
<td>• You supply the app to a client. You or the client can submit it via mail/fax. Or, upload a digital file of the app via the Retail Producer Portal</td>
</tr>
<tr>
<td>• You maintain control throughout – from quote to effectuation, ensuring agent attachment</td>
<td>• If clients open and close browsers, it could break your Express/Quote link</td>
<td>• Requires several back-end enrollment and billing touchpoints, making this the most time-consuming enrollment process</td>
</tr>
<tr>
<td>• Sale is credited and visible to you in the portal, often within 24 hours</td>
<td>• Sale is credited and visible to you in the portal, often within 24 hours</td>
<td>• Missing, unreadable or incorrect information requires outreach and time</td>
</tr>
<tr>
<td>• Preferred enrollment channel</td>
<td>• Preferred enrollment channel</td>
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</tbody>
</table>
APPLYING FOR SPECIAL ENROLLMENT

Tips for special enrollment:
1. Choose the app. The time of year and the plan year determine if the Special Enrollment Information panel opens.
2. Confirm how the client provided consent in the Authorization panel.
3. Select “Yes.”
4. Select all applicable life events.
5. Enter the date of the event(s).
6. The “Effective Date” adjusts depending on the event and date entered.

Submit documents via the E-Communication tab (next page). For details on using the Retail Producer Portal, see the guide.
APPLYING FOR SPECIAL ENROLLMENT

Retail Producer Portal

Submitting event documents via the portal is simple. The documents should be in ONE digital file that’s no more than 10 MB in size.

1. Select the E-Communication tab.
2. Click the “Document Submission” link.
3. An “Account Number” is optional.
4. The “E-App Number” field is optional.
5. Select “SEP Documentation” from the “Document Type” drop down box.
6. Navigate to the file’s location. Select it. The filename will populate here.
7. Click the “Submit” button.
8. Click “OK” when the confirmation message and tracking number appears.

For details on using the Retail Producer Portal, see the guide.
Those applying for special enrollment will need to complete the following for both online and paper enrollment:

- Select a qualifying event
- Enter the date of the event
- Upload (or attach) qualifying event documentation
Retail Shopping Cart

When your client selects a qualifying event, the “Add Supporting Document” screen provides helpful information on the documents required to qualify for that event.

Accepted file formats: png, jpeg, jpg and gif, which are all image files. We also accept pdf files.

Applicants can submit multiple files. The total combined size of all submitted files must be less than 20 MB.
APPLYING FOR SPECIAL ENROLLMENT

Paper Application

• Use a 2019 off-exchange paper application in English or Spanish.

• Use the paper application checklist for producers to make sure the most important elements are completed.
  o Enrollment channel overview is on page 1
  o The checklist can be found on page 2

• If your clients are completing the app, send them a consumer-facing paper application checklist.
APPLYING FOR SPECIAL ENROLLMENT

Paper Application

Complete paper application in **English** or **Spanish**. Then:

1. Have your client gather the documents for his or her qualifying life event.
2. Submit the ENTIRE application (all pages) and documents together to us in **1 of 4 ways**:

<table>
<thead>
<tr>
<th>Method</th>
<th>Instructions</th>
</tr>
</thead>
<tbody>
<tr>
<td>ENTER</td>
<td>Enter data from the completed app into the Retail Producer Portal via the Enrollment tab. Note that qualifying event documentation must still be uploaded. See pages 30-38 of the portal guide for details on enrolling, page 39 for SEP instructions, and pages 67-68 on uploading documents.</td>
</tr>
<tr>
<td>MAIL</td>
<td>Send via regular mail to BCBSIL Attn: Individual Enrollment, PO Box 3236, Naperville, IL 60566-7236 Send via overnight mail to BCBSIL, Attn: Individual Enrollment, 1000 Warrenville Rd, Ste 400, Naperville, IL 60563</td>
</tr>
<tr>
<td>FAX</td>
<td>Fax to 888-223-1988</td>
</tr>
<tr>
<td>UPLOAD</td>
<td>Upload a digital file of the completed app via the Retail Producer Portal. (Initial payment must be EFT for upload submissions.) Use “New Business Application” document type in the E-Communication tab when uploading the completed app and supporting documents. (Don’t use “SEP Documentation” when an app is included.)</td>
</tr>
</tbody>
</table>
CLIENTS WITH DISCONTINUED 2018 BCBSIL QHPs

Top Tips for Clients
Special Enrollment Rules
Applying via Retail Shopping Cart
Applying via Retail Producer Portal
Applying via Paper Application
Members enrolled in a 2018 BCBSIL QHP that’s being discontinued qualify for special enrollment

Their qualifying event is:
Lost Minimum Essential Coverage (MEC): Involuntary loss due to reasons other than non-payment of premium or rescission

For this event, the event date is the last day of coverage, which is:
December 31, 2018

The Special Enrollment period for a discontinued plan is:
Within 60 days BEFORE or AFTER the qualifying event. These clients can enroll in a new plan through March 1, 2019.

Qualifying event document requirements for those with discontinued 2018 BCBSIL QHPs
When applying for special enrollment, documentation is NOT required if specific application fields are completed. See the following pages for details.
If members accept mapped plans, or choose new plans during open enrollment, they can still use their loss of MEC for an SEP through March 1, 2019.

Under most circumstances, existing off-exchange QHP members that qualify for an SEP can change to any off-exchange plan they want (i.e., HMO to PPO or Silver to Bronze).

Starting in early 2019, most existing on-exchange Marketplace enrollees who qualify for an SEP won’t be able to move from one metallic to another in most cases. These rules are regulated by CMS. For more about on-exchange SEPs, see page 3.
CLIENTS WITH DISCONTINUED 2018 QHPs

Applying via Retail Shopping Cart

If your client uses the discontinued BCBSIL plan event to qualify for a special enrollment, the client doesn’t have to upload verification documents when applying via the Retail Shopping Cart if they do the following:

1. Select “Please check this box if you’ve received a notice saying your current 2018 BCBS health care plan will not be offered in 2019.”
2. Select 1a as the event and enter 12/31/2018 as the event date.
3. In the “Other Coverage” section, enter coverage details. This will be required.

These selections allow members to bypass submitting event documentation.
CLIENTS WITH DISCONTINUED 2018 QHPs

Applying via Retail Producer Portal

If your client uses the discontinued BCBSIL plan event to qualify for a special enrollment, the client doesn’t have to include any verification documents when applying via the Retail Producer Portal if you do the following:

1. Select 1a as the event and enter 12/31/2018 as the event date.
2. Complete the “Other Coverage” section with applicable BCBSIL information.
If your client uses the discontinued BCBSIL plan event to qualify for a special enrollment, the client doesn’t have to include any verification documents with the paper application if they do the following:

1. On page 5, select 1a as the event and enter 12/31/2018 as the event date.
2. On page 10, the client should complete the “Other Coverage” section.

These selections allow members to bypass including event documentation.
CONTACTING SEP APPLICANTS

When Outreach is Required
Overview of Document Request Process
Applicant Outreach
Consumers must submit validation documents that are required for their qualifying event to be eligible for an SEP.

If no documentation is submitted, or if the wrong document is submitted with the application, we’ll begin an outreach process.

We’ll contact the applicant directly by mail.

If the required validation documents are not received with the application, the applicant has 30 calendar days to provide them or the application will be withdrawn, resulting in no coverage for the applicant. However, if the SEP window is still open, the applicant can reapply.
When we receive a digital or paper application, our enrollment team checks for SEP documents. If the app is from a BCBSIL member that had a 2018 discontinued plan, no documentation is required. For all other applicants, documentation is required. If none exist or are incorrect we’ll follow these steps:

<table>
<thead>
<tr>
<th>Timeline</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Calendar Day</td>
<td><strong>FIRST OUTREACH:</strong></td>
</tr>
<tr>
<td></td>
<td>1. Mail applicant a request letter with instructions on submitting the correct validation documents</td>
</tr>
<tr>
<td></td>
<td>2. Pend application for a maximum of <strong>30 calendar days</strong>, which begins when we make our first outreach attempt</td>
</tr>
<tr>
<td>Anytime during pend period</td>
<td><strong>SECOND OUTREACH:</strong> If the applicant sends incomplete or incorrect documentation, we’ll mail the applicant a second request for validation documents</td>
</tr>
<tr>
<td>30th Calendar Day</td>
<td><strong>WITHDRAWAL:</strong> Mail applicant withdrawal letter if no valid documentation has been received, <strong>resulting in no coverage for applicant</strong>. However, if the SEP window is still open, the applicant can reapply.</td>
</tr>
</tbody>
</table>
CONTACTING SEP APPLICANTS

Applicant Outreach

REQUEST LETTERS
no or insufficient documentation with application

Within days of identifying missing documents, our enrollment team will send a letter to your client about the verification requirement.

The letter provides instructions on what your client should do next.

A similar letter may be sent a second time within the 30-calendar-day pend period.

CALENDAR DAY 1-3

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CONTACTING SEP APPLICANTS

Applicant Outreach

LIST OF DOCUMENTS NEEDED PER LIFE EVENT

With the SEP documentation request letter, a list of possible documents per life event is also included. Applicants should circle their qualifying event and return it with their documents. These instructions are included on page 1.

Your client needs to submit one document from the list unless otherwise specified.

The verification document must include the date the event occurred.

The verification document must be mailed or faxed to us. It can also be uploaded via the Retail Producer Portal.
CONTACTING SEP APPLICANTS

Applicant Outreach

WITHDRAWAL LETTER

On the 30th calendar day of receiving the application, we will withdraw it if we haven’t received proof of SEP eligibility.

A withdrawal letter will be mailed on the 30th calendar day.

If the SEP window is still open, the applicant can reapply.

If you or your client then submits a new application, the effective date will be based on the submission of the new application, not the first application that was withdrawn.
REQUIRED DOCUMENTS FOR SEP LIFE EVENTS
REQUIRED DOCUMENTS FOR SEP LIFE EVENTS

SEP Qualifying Events & Required Documentation for Off-exchange Policies

1. I and/or my dependent(s) lost Minimum Essential Coverage:
   a. For reasons beyond my control
   b. Someone on the plan turned age 26 (or 30 if unmarried military veteran), or was legally separated or divorced
   c. The policyholder died
   d. I lost my job, I lost hours, my employer stopped making payments, or my COBRA benefits ended
   e. I moved away from my HMO plan’s service area.
   f. I have a claim that would meet or go over a lifetime limit on all benefits.
   g. I lost coverage when my plan stopped covering people in my situation.
   h. I moved out of the service area and lost my group HMO coverage.

2. I got married.

3. I had a baby, adopted a child, had a child placed with me for adoption, took in a foster child or must cover a dependent due to court order.

4. There was a mistake when I signed up for my last health plan, or my previous health plan or issuer broke its contract with me.

5. Someone on my plan had a change in income and doesn’t qualify for the APTC or cost-sharing reductions, or my last plan broke government rules.

6. I moved.

7. My current policy ends on a date other than December 31.

8. An allowed reason I do not see on this list.

This training includes documentation requirements per qualifying life event. Access, read and download the Required Documentation Guide for Producers.
QUALIFYING LIFE EVENT EXAMPLES

Qualifying Event: Marriage
Qualifying Event: New Baby
Qualifying Event: Job Loss
Pete and Allison get married
They both apply for coverage

What document do they include with their special enrollment application?
QUALIFYING LIFE EVENT EXAMPLES

Qualifying Event: Marriage

They should submit ONE document from this list:
• Marriage license or certificate
• Domestic partner affidavit or certificate
• Civil union certificate

The document submitted must include the date the event occurred. Pete or Allison must show that he or she had Minimum Essential Coverage‡ for at least 1 day in the 60 days prior to their marriage date.

‡ For events where proof of MEC for at least one day in the 60 calendar days prior to the event date is required, applicants may qualify for a hardship exemption. We will accept any exemption that’s granted by the Marketplace. For details on applying for an exemption, see these CMS guidelines.
Sara and Juan are married and have an existing policy with BCBSIL.

Sara gives birth on August 1 to a new baby, Grace.

Sara and Juan apply for coverage for Grace.

What document do they include with Grace’s special enrollment application?
QUALIFYING LIFE EVENT EXAMPLES

Qualifying Event: New Baby

They should submit a birth certificate.

If Sara and Juan gained a dependent due to adoption or foster care, they should submit the appropriate document:

• Birth certificate that includes the name of the adopting parent(s)
• Adoption papers
• Guardianship papers
• Dependency verification letter
• Evidence of medical guardianship

The document submitted must include the DATE the event occurred.
John loses his employer based coverage due to job loss. He has 60 days from the loss of the coverage to select a new individual plan.

What document does John include with his special enrollment application?
QUALIFYING LIFE EVENT EXAMPLES

Qualifying Event: Job Loss

John could submit ONE document from this list:

- Letter from prior CARRIER with coverage termination date on company letterhead
- Letter from prior EMPLOYER with coverage termination date on company letterhead
- Discontinuation notice
- COBRA notice

The document submitted must include the DATE the event occurred.
AFFIRMING YOUR TRAINING

WHY do you have to affirm completion?
WHO has to affirm completion and by WHEN?
HOW and WHERE do EXISTING PRODUCERS affirm completion?
HOW and WHERE do NEW PRODUCERS affirm completion?
Because our producers are so integral to the enrollment process, it’s critical that you’re up-to-speed so that you can assist your clients with paper or online enrollment as well as submitting documents.

**AFFIRMING YOUR TRAINING**

**WHY do you have to affirm completion?**

Because our producers are so integral to the enrollment process, it’s critical that you’re up-to-speed so that you can assist your clients with paper or online enrollment as well as submitting documents.

**WHO has to affirm completion and by WHEN?**

**Existing Producers**
Existing writing producers/subproducers must complete the SEP training and affirm they completed it by **Feb. 15, 2019**. There will be no compensation for plan year 2019 policies if the producer of record didn’t complete and affirm the SEP training by Feb. 15, 2019.

**New Producers**
Producers/subproducers onboarded after Feb. 15, 2019 must complete the SEP training and affirm they completed it **within 30 days of receiving their Welcome email** from our Producer Administration team. There will be no compensation for plan year 2019 policies if the producer of record didn’t complete and affirm the SEP training within the 30 calendar days period.

*This is an annual requirement. We reserve the right to change compensation in accordance with the terms of your contract.*
HOW and WHERE do EXISTING PRODUCERS affirm completion?

1. Log in to Blue Access for Producers. If you are a subproducer, be sure to log in using your own 9-digit BCBSIL-issued producer number and password, not that of your agency’s. The affirmation must be made by the writing producer/subproducer.

2. Select “Producer Services” at the top of the page.
AFFIRMING YOUR TRAINING

HOW and WHERE do EXISTING PRODUCERS affirm completion?

3. Click on “SEP Training Affirmation” link.

4. Read the affirmation language and click on the green “Submit” button.

5. Be sure to keep the “Service Request” ticket confirmation number for your records.

Existing producers/subproducers:
Be sure to affirm your training by 2/15/2019
Newly contracted producers and onboarded subproducers will be sent a Welcome email that will include a link to the SEP training and a Microsoft Excel spreadsheet for affirming the completion of the training. The Excel file has only four fields that should be completed and sent back to our Producer Administration team via email at Producer_Service_Center@hcsc.net.

This Special Enrollment Period training is for Producers associated with Health Care Service Corporation, a Mutual Legal Reserve Company (“HCSC”), which operates through its Blue Cross and Blue Shield of Illinois, Blue Cross and Blue Shield of Montana, Blue Cross and Blue Shield of New Mexico, Blue Cross and Blue Shield of Oklahoma and Blue Cross and Blue Shield of Texas divisions (each a “BCBS Plan”).

By submitting this document, the submitter affirms he or she has fully reviewed the Special Enrollment Period training for individual business and understands this requirement is exclusive to HCSC and does not substitute for and is in addition to the Federally Facilitated Marketplace (On Exchange) training administered by the Centers for Medicare & Medicaid Services (CMS).

Upon completion, please email this document to Producer_Service_Center@hcsc.net.

New producers/subproducers onboarded after 2/15/2019: Affirm your training within 30 days of receiving your Welcome Email.
ACCESSING SEP MATERIALS

CLICK ON ANY OF THE FOLLOWING TO OPEN (must have internet access)

- Required Documentation Guide for Producers
- Required Documentation Checklist Sent to Applicants
- Required Documentation Flier for Consumers
- Special Enrollment Sales Flier for Potential Clients