



## Health Care Reform **Bulletin**

# New Exchange Special Enrollment Period for “In Line” Individuals in 2015

Provided by Stellar Benefits Group

### Quick Facts

- The Exchange’s 2015 open enrollment period ended on Feb. 15, 2015.
- CMS provided a new special enrollment period for those who were “in line” as of Feb. 15, 2015.
- These individuals will have until Feb. 22, 2015, to enroll in a QHP.
- Coverage will be effective March 1, 2015, for those who enroll during the SEP.

If certain conditions are met, a new special enrollment period allows individuals who were “in line” as of Feb. 15, 2015, to enroll in Exchange coverage after the 2015 open enrollment period closed.

Under the Affordable Care Act (ACA), individuals may only enroll through an Exchange **during a permitted enrollment period** (such as open enrollment or a special enrollment period). The 2015 open enrollment period ended on Feb. 15, 2015.

On Feb. 16, 2015, the Centers for Medicare & Medicaid Services (CMS) issued [guidance](#) providing a **special enrollment period** (SEP) for individuals who have been unable to enroll in coverage through the federally-facilitated Exchange (FFE) at the end of the 2015 open enrollment period due to certain circumstances they experienced in the process.

The SEP began on **Feb. 16, 2015**, and will end on **Feb. 22, 2015**. If certain conditions are met, this SEP allows individuals to enroll in Exchange coverage after the end of the 2015 open enrollment period.

This guidance applies to the FFE, including state partnership Exchanges. State-based Exchanges may elect to offer similar SEPs.

### Overview of Special Enrollment in Exchanges

Individuals may be allowed an SEP in an Exchange following certain triggering events, including enrollment errors. These SEPs allow

individuals to enroll in a qualified health plan (QHP) through an Exchange outside of open enrollment.

The effective date of any coverage elected during an SEP generally follows rules similar to those applicable during initial enrollment. This means that coverage would generally be effective as of the first day of the month for elections made by the 15th of the preceding month, and on the first day of the second following month for elections made between the 16th and the last day of a given month.

However, the Exchange will set an effective date for SEPs triggered by enrollment errors.

### SEPs for “In Line” Individuals

CMS noted that certain circumstances across consumer enrollment channels (such as [HealthCare.gov](#) and the Exchange call center) leading up to the Feb. 15, 2015, deadline have kept some consumers from completing the enrollment process, despite their efforts to meet the deadline.

As a result, CMS will provide an SEP for consumers who:

1. Currently are not enrolled in coverage through the FFE;

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2. Have not been terminated from coverage purchased through the FFE during the 2015 open enrollment period; and
3. Attest that they attempted to enroll during the annual open enrollment period but did not complete the process (referred to as being "in line") by Feb. 15, 2015, because they experienced either:
  - A technical issue with [HealthCare.gov](http://HealthCare.gov) that prevented them from completing enrollment by Feb. 15; or
  - An extensive call center wait on Feb. 13, 14 or 15.

The SEP began on **Feb. 16, 2015**, and will end on **Feb. 22, 2015**. Consumers will not be able to access this SEP through the direct enrollment process. Instead, they should contact the FFE via the call center or [HealthCare.gov](http://HealthCare.gov).

Enrollments completed during the SEP will have an effective date of March 1, 2015, to align with the coverage effective date that the consumer would have received had he or she been able to complete the enrollment process by Feb. 15, 2015. Because the "in line" SEP coverage effective date of March 1, 2015, follows the end date of the SEP (Feb. 22, 2015) so closely, the FFE expects issuers to allow consumers a reasonable amount of time in which to pay the first month's premium.

#### **More Information**

Please contact Stellar Benefits Group for more information on Exchange enrollment periods.

*Source: Centers for Medicare & Medicaid  
Services*

