



BOARD ADVISORY GROUP

March 1, 2017

CMS Proposed Rule

- The Centers for Medicare and Medicaid Services (CMS) issued a proposed rule for 2018, which includes a series of reforms aimed at stabilizing the individual and small group health insurance markets.
- The proposed rule would make the following changes:
 - SEP Verifications
 - Guaranteed Availability
 - Determining Levels of Coverage
 - Network Adequacy
 - QHP Certification Calendar
 - Open Enrollment Period Timeline

Open Enrollment Period Timeline

- **New 2018 Open Enrollment (OE) Period Timeline**
 - **November 1, 2017 through December 15, 2017**
 - **Technological Impacts**
 - Concentrated high user volume may overload Connect for Health Colorado (Marketplace) and Single Eligibility System websites
 - Discussions already underway with Marketplace and OIT vendors to ramp up system capacity
 - Service level agreement for defect resolution being reevaluated
 - Re-prioritization of new projects
 - Resources will need to be reallocated to support compressed OE period
 - Delayed plan certification may compress testing timelines

Open Enrollment Period Timeline

- **New 2018 Open Enrollment Period Timeline**
 - **Operational Impacts**
 - More non-real time eligibility determinations and increased Reasonable Opportunity Periods
 - Additional staffing needed at service center and medical assistance site
 - Will compress training timelines
 - Will increase cost to the Marketplace
 - Additional phone capacity
 - Will increase cost to the Marketplace

SEP Changes

- **Pre-Enrollment SEP Verifications for FFM Platform States**
 - SBMs are encouraged to follow CMS guidance; however, they are not required to implement for Plan Year 2018
- **SEP Enrollment Changes (do not apply to SHOP)**
 - If reporting a marriage, at least one spouse would need to have had minimum essential coverage in the last 60 days
 - Reduction in the use of “Exceptional Circumstances” SEP

Open Enrollment Period Timeline

Stakeholder Impacts

- How will this impact your constituencies?
 - Is there data to support?
- How can the Marketplace help to mitigate negative impacts?
- What are the key points that the Marketplace should include in our comments to CMS?