



COVERED CALIFORNIA POLICY AND ACTION ITEMS

November 19, 2020 Board Meeting

OPTIONAL SPECIAL ENROLLMENT PERIOD COVERAGE EFFECTIVE DATES

Katie Ravel, Director, Policy Eligibility & Research Division

BACKGROUND

- The 2021 Notice of Benefit and Payment Parameters gives State Exchanges the option to provide individuals qualifying for certain special enrollment periods an earlier coverage effective date.
- Prior to the new rule, Covered California was generally required to follow the “15-day rule” to effectuate coverage for certain qualifying life events (QLEs).
- Under the 15-day rule, it can take as many as 47 days from plan selection to the coverage effective date (e.g., July 16 to September 1).

15-DAY RULE QUALIFYING LIFE EVENTS

The QLEs below currently follow the 15-day rule coverage effective dates:

1. Loses a dependent / is no longer a dependent due to divorce, separation, or dissolution of domestic partnership
2. Is no longer incarcerated
3. Newly gains citizenship, national, or lawful presence status
4. Enrollee / dependent is newly eligible or ineligible for APTC or has a CSR eligibility change
5. Makes a permanent move and gains access to a new QHP
6. Gains / maintains AI/AN status (can change plans once per month)
7. Experiences domestic abuse / spousal abandonment
8. Returns from active duty military service
9. Continuity of care for certain medical conditions

COVERED CALIFORNIA PROPOSED POLICY

Covered California proposes to adopt the new federal option as follows:

- Eliminate the 15-day rule and set the coverage effective date for impacted QLEs to the 1st of the month after plan selection, except when regulations require additional options such as for:
 - birth / adoption / foster care
 - child support / other court orders
 - exceptional circumstances
 - other miscellaneous QLEs

Benefits:

- Provides consistency and optimizes the consumer experience as most individuals would get 1st of the month coverage
- Reduces consumer confusion regarding different effective date rules / easier for Service Center Representatives to explain
- Minimizes gaps in coverage

NEXT STEPS

- Implement changes in CalHEERS mid-2021 / exact date to be confirmed in early 2021
- Make proposed changes to state regulations under emergency rulemaking authority mid-2021 -- to be effective prior to the system change