

# Life Change Events

Helping Clients Navigate Changes

Building Better Health Conference - 2018



**COLORADO**  
Department of Health Care  
Policy & Financing



**COLORADO**  
Department of  
Regulatory Agencies  
Division of Insurance



**COLORADO**  
Department of  
Regulatory Agencies

Division of Insurance

# Life Change Events

hello!

**Jason Lapham**

Lead Analyst, Life and Health Section  
Consumer Services  
Colorado Division of Insurance



# Enrollment Period Regulation

## Emergency Regulation 18-E-04

- Effective September 7, 2018
- Annual Open Enrollment and Special Enrollment Periods
- Special Enrollment Period eligibility verification
- Time Frames
- § 10-16-105.7, C.R.S.

# Individual Special Enrollment Periods (SEPs)

## What is a Special Enrollment Period?

- The time period outside the yearly Open Enrollment Period to change health plans or enroll in a new health plan due to a Qualified Life Change Event
- Qualified Life Change Event can occur at any point during the year
- Individual Open Enrollment is November 1 through January 15

# Individual SEPs

## When is a Special Enrollment Period?

- Typically 60 days following a Qualified Life Change Event
- Qualified Individual—Apply 60 days in advance of a certain Qualified Life Change Events

# Individual SEPs

## What are the regular mid-month SEP coverage effective dates?

- The first day of the following month if a plan is selected between the 1<sup>st</sup> and 15<sup>th</sup>
- The first day of the second following month if a plan is selected between the 16<sup>th</sup> and the last day of the month

# Qualified Life Change Events

## What are some types of Qualified Life Change Events?

- Involuntary loss of creditable coverage
- Changes in household size
- Change in residence
- Change in eligibility for financial assistance
- Enrollment or plan error



# Involuntary Loss of Creditable Coverage

## Examples

- Coverage through a job or another person's job
- Loss of Medicare eligibility
- Loss of Medicaid or CHP+
- Dependent turns 26
- COBRA is exhausted

# Involuntary Loss of Creditable Coverage

## Effective Dates

- Effective on the the first day of the following month if plan selected prior to the loss of coverage
- Mid-month rule
- Exchange may allow effective first day of the following month if plan is selected after event

## Eligibility Documentation

- Written confirmation of the loss of coverage
- COBRA or state continuation eligibility notice or exhaustion notice

# Changes in Household Size

## Examples

- Marriage
- Divorce or legal separation
- Death in the family
- Baby, adoption or placement for adoption, placement in foster care
- Gained or became a dependent due to child support or other court order

# Changes in Household Size

## **Effective Dates Birth, Adoption, Placement for Adoption/Foster Care, Court Order**

- Effective the date of the event or the first day of the month following the event if requested by policyholder

OR

- In the case of a court order, it may follow the mid-month rule if requested by the policyholder

# Changes in Household Size

## **Effective Dates Marriage, Civil Union, Loss of Coverage Due to Death of Family Member**

- Effective no later than first day of the month following plan selection

# Changes in Household Size

## Eligibility Documentation

- Marriage license, civil union certificate, or common law documentation
- Birth certificate, or adoption or foster care documents
- Court order
- Death certificate or obituary
- Final divorce or separation documents
- Proof of age when turning 26 and evidence of loss of creditable coverage

# Change in Residence

## Examples

- Moving to a new zip code
- Student moving to or from school
- Seasonal worker moving to or from the place he or she lives and works
- **ONLY IF**, the move results in gaining access to new QHPs

# Change in Residence

## Effective Dates

- Regular mid-month rule

## Eligibility Documentation

- U.S. Postal Service documentation
- Copy of lease or purchase agreement
- Utility bills
- Driver's license



# Financial Assistance Eligibility

## APTC or CSR Eligibility

- Newly eligible or ineligible for APTC or change in eligibility for CSRs
- Dependent enrolled in the same plan who is newly eligible or ineligible for APTC or change in eligibility for CSRs
- Newly eligible for APTC because employer plan is no longer affordable or no longer meets minimum value standards.

# Financial Assistance Eligibility

## Effective Date

- Regular mid-month rule

## Eligibility Documentation

- Evidence from the Exchange of a new determination of eligibility or ineligibility for APTC or CSRs

# Enrollment or Plan Error

## Examples

- Unintentional, inadvertent, or erroneous enrollment or non-enrollment due to an error or misrepresentation by carrier, producer, or Exchange
- Material error in plan benefits, service area, or premium contributed to the purchase of plan
- Carrier has violated key part of the policy

# Enrollment or Plan Error

## Effective date

- Based on the circumstances of the SEP

## Eligibility Documentation

- Letter from Division of Insurance indicating a material violation of a carrier's contract
- Any other reasonably sufficient documentation

# Other Qualified Life Changing Events

## Examples

- Victim of domestic abuse
- Becoming a U.S. citizen, U.S. National, or lawfully present individual
- Release from incarceration
- Gaining or maintaining status as an American Indian or Alaska Native
- Starting or ending AmeriCorps Service

# Employee SEPs for Small and Large Employer Plans

## Qualified Life Change Events

- Loss of creditable coverage
- Change in household size
- Change in eligibility for financial assistance

# Loss of Creditable Coverage

## Examples

- Death of covered employee
- Termination or reduction in number of hours of the covered employee's employment
- Covered employee becoming entitled to benefits under Medicare
- Losing Medicaid or CHP+
- Divorce or legal separation

# Change in Household/Dependents

## Examples

- Marriage or civil union
- Birth, adoption, placement for adoption, or placement in foster care
- Court Order



# SEP Time Frames

## When are Group SEPs?

- 30 days beginning on the day of the event EXCEPT when losing Medicaid or CHP+ which is 60 days
- 30 days in advance when employee is notified or becomes aware of a future event

# Coverage Effective Dates

## When is coverage effective?

- Must be effective on the date of the event for birth, adoption, placement adoption/foster care
- For all other events, no later than first day of month following carrier or Exchange receiving enrollment form

# Division Contact Information

## Phone

303-894-7490 or 800-930-3745

## Email

dora.insurance@state.co.us

## Complaints

[www.dora.colorado.gov/insurancecomplaints](http://www.dora.colorado.gov/insurancecomplaints)

## Website

[www.askdora.colorado.gov](http://www.askdora.colorado.gov) -- Click on "Health Insurance" tab



**COLORADO**  
Department of  
Regulatory Agencies

Division of Insurance

Thank you!

# Questions?



**COLORADO**  
Department of  
Regulatory Agencies

Division of Insurance



## REPORTING A QUALIFIED LIFE CHANGE EVENT (QLCE)

Building Better Health Conference  
October 15, 2018  
Saphia Elfituri, Senior Policy Associate

## Mixed Eligibility Households

Mixed eligibility households should take the following steps to report their QLCE:

- Login to PEAK account and make necessary changes
- Once changes are made in PEAK, continue to Connect for Health Colorado account
- Confirm that information from PEAK is correct
- Select correct QLCE and event date
- Shop for a new plan or keep existing plan
- Submit verifications of QLCE directly to insurance company (if requested)

## Existing APTC/CSR/QHP Customers

Existing customers who only have APTC, CSR and/or QHP should take the following steps to report their QLCE:

- Login to Connect for Health Colorado account
- Make any other necessary changes
- Select correct QLCE and event date
- Shop for a new plan or keep existing plan
- Submit verifications of QLCE directly to insurance company (if requested)

## New Customers

Customers who do not have an enrollment should take the following steps to report their QLCE and enroll:

- Create a Connect for Health Colorado account
- Complete new application
- Select correct QLCE and event date
- Shop for a plan
- Submit verifications of QLCE directly to insurance company (if requested)



# Notices

Connect for Health Colorado has three new eligibility notices this year

- Notices will inform customers of enrollment deadlines
- Existing customers who do not have a QLCE will be noticed that they do not have an SEP and their appeal rights
- Existing customers who do have a QLCE will be noticed that they were approved for an SEP and are provided with next steps

# Reporting a QLCE

[Apply for Coverage](#)[Find a Plan](#)[My Account](#)

[Learn More](#)[Get Assistance](#)

JDoe7700Sign Out

## Tell us about life changes

Help me understand this page


- ☐ Birth/Adoption/Foster Care/Court Order
- ☐ Marriage
- ☐ Divorce
- ☐ Death
- ☐ Change of primary residence
- ☐ Change of income or job
- ☐ Enrollment in future or existing health insurance
- ☐ Will lose or lost health insurance
- ☐ Gained eligible immigration status
- ☐ Change on incarceration status
- ☐ Gain of American Indian/Alaskan Native tribal status
- ☐ Pregnancy
- ☐ None of these apply to my household

[< Back](#)

[Save and exit](#)

[Continue](#)

# Reporting a QLCE, Cont.



[Apply for Coverage](#)

[Find a Plan](#)

[My Account](#)

[Learn More](#)

[Get Assistance](#)

John.Doe@fakeemail.com00[Sign Out](#)

## Tell us about life changes

[Help me understand this page](#)

- ☐ Birth/Adoption/Foster Care/Court Order
- ☐ Marriage
- ☐ Divorce
- ☐ Death
- ☐ Change of primary residence
- ☐ Change of income or job
- ☐ Enrollment in future or existing health insurance
- ☒ Will lose or lost health insurance

Who does this change apply to?

☐ James Doe

Event Date  
mm/dd/yyyy

☒ Jessica Doe

Event Date  
11/01/2018

☐ John R. Doe, Jr.

Event Date  
mm/dd/yyyy

☐ Jane Doe

Event Date  
mm/dd/yyyy

- ☐ Gained eligible immigration status
- ☐ Change on incarceration status
- ☐ Gain of American Indian/Alaskan Native tribal status
- ☐ Pregnancy
- ☐ None of these apply to my household

[< Back](#)[Save and exit](#)[Continue](#)