

# CSEAC & HIAC Recommendation to MNsure Board

## Open Enrollment Period

Richard Klick, CSEAC Chair & Jonathan Watson, HIAC Chair

MNsure Board of Directors Meeting

June 21, 2017

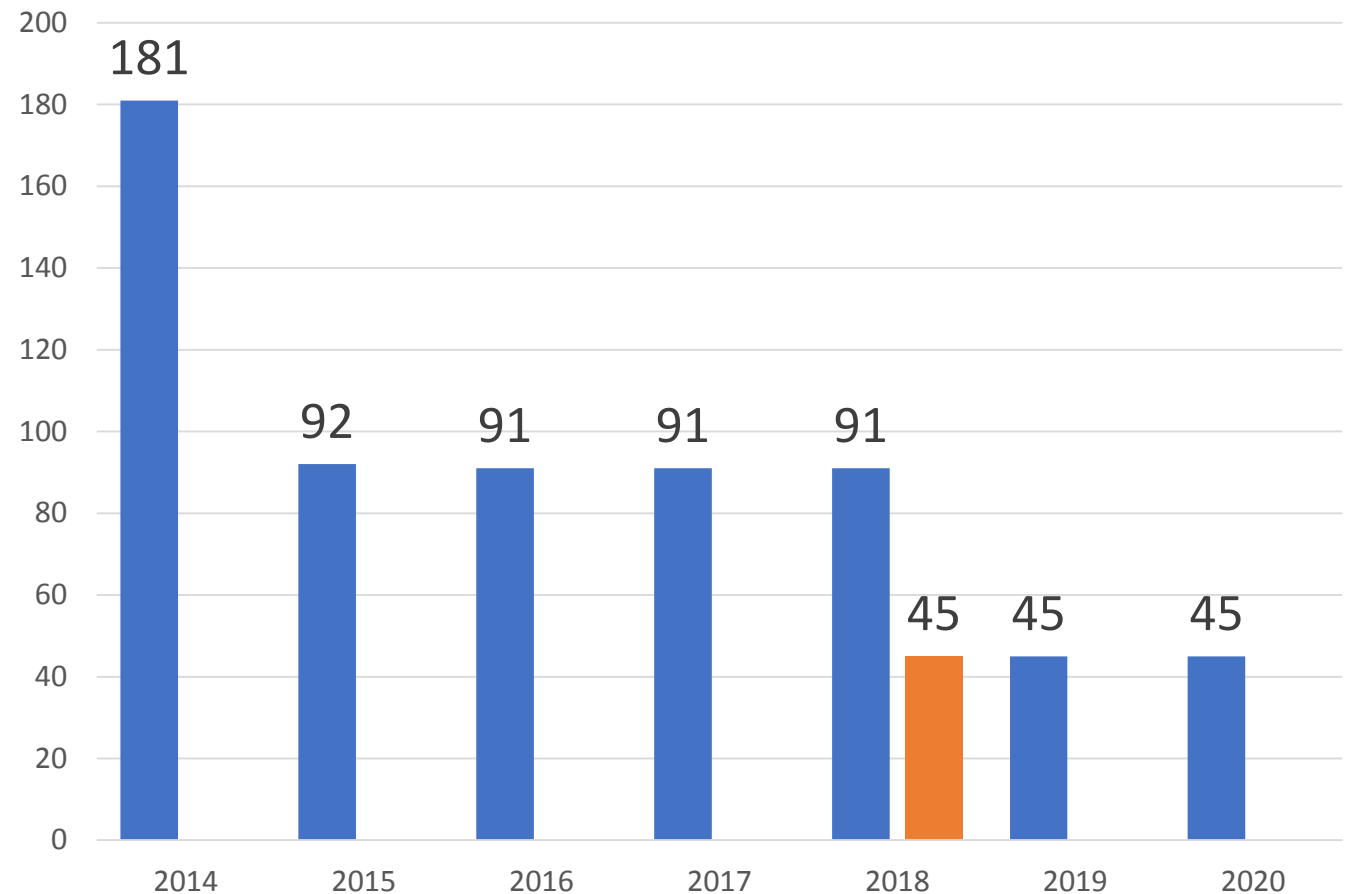
# Background

- On April 13, 2017, CMS released final rule designed to “improve the risk pool and promote stability in the individual insurance market” for 2018.
- Final Rule reduces the length of 2018 open enrollment from three months or 92 days (11/1/2017-1/31/2018), to 45 days (11/1/2017-12/15/2017) to “reduce opportunities for adverse selection.”
- Minnesota’s open enrollment period will match federal rule - 45 days (11/1/2017 to 12/15/2017) – unless MNsure Board actively changes open enrollment period.
- ACA statute - § 155.410 Initial and annual open enrollment periods – reduces OE for CY2019 to 45 days

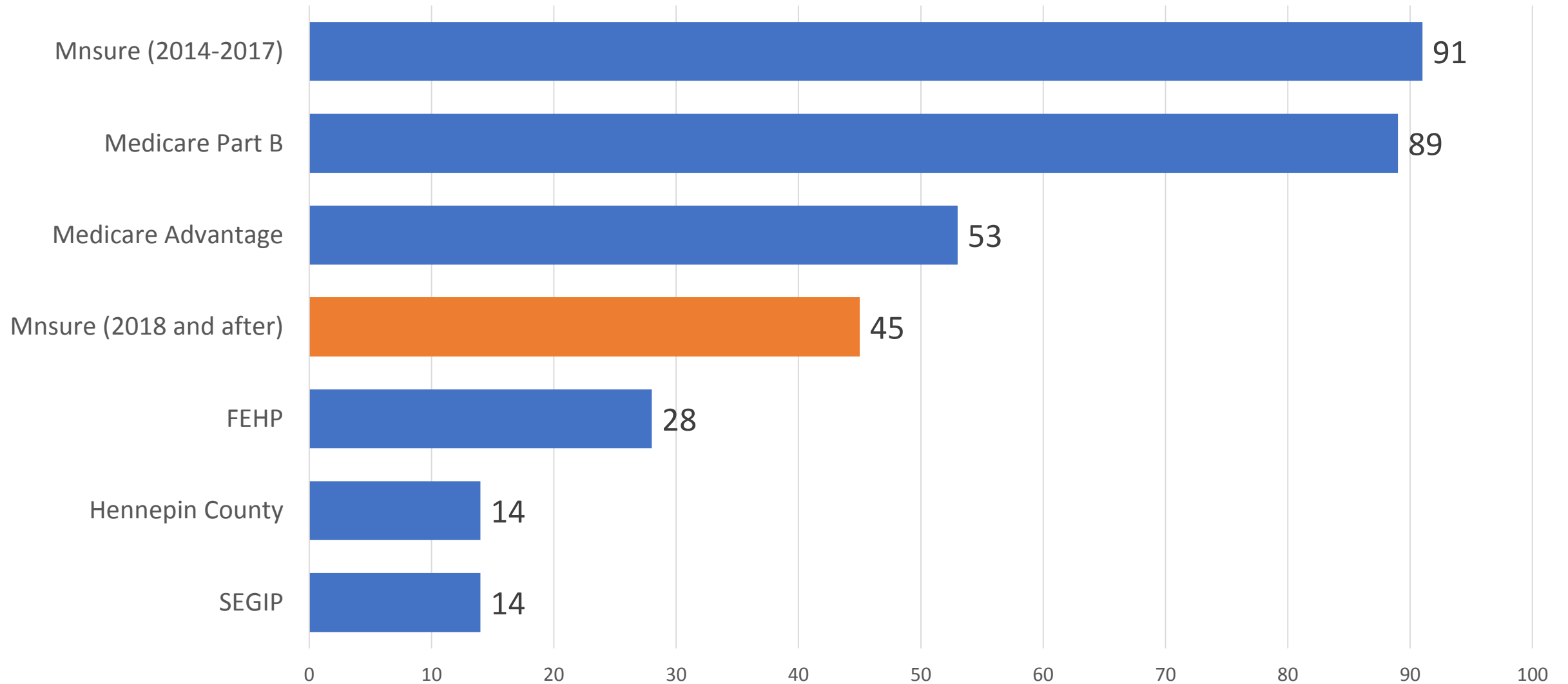
# Open Enrollment Periods

Coverage Year	Start Date	End Date
2014	10/1/2013	3/31/2014
2015	11/15/14	2/15/15
2016	11/1/15	1/31/16
2017	11/1/16	1/31/17
2018	11/1/17	1/31/18
2018	11/1/17	12/15/17
2019	11/1/18	12/15/18
2020	11/1/19	12/15/19

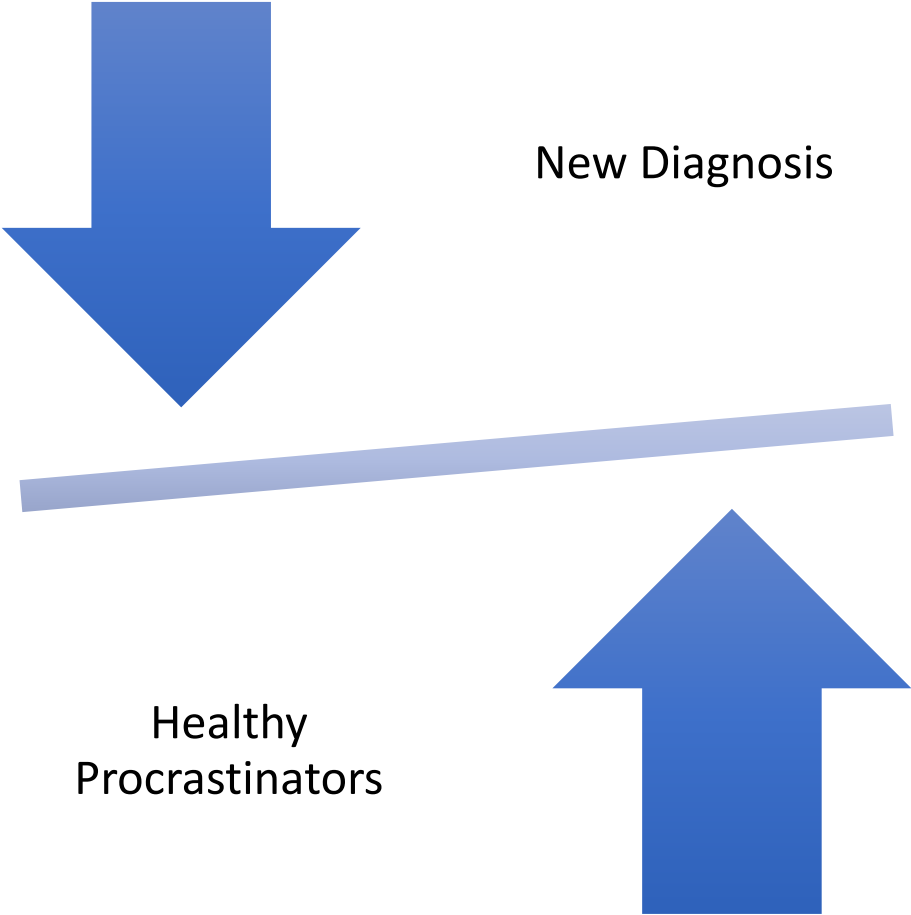
Open Enrollment Days, by Coverage Year



# Other Open Enrollment Periods



# Two Key Issues

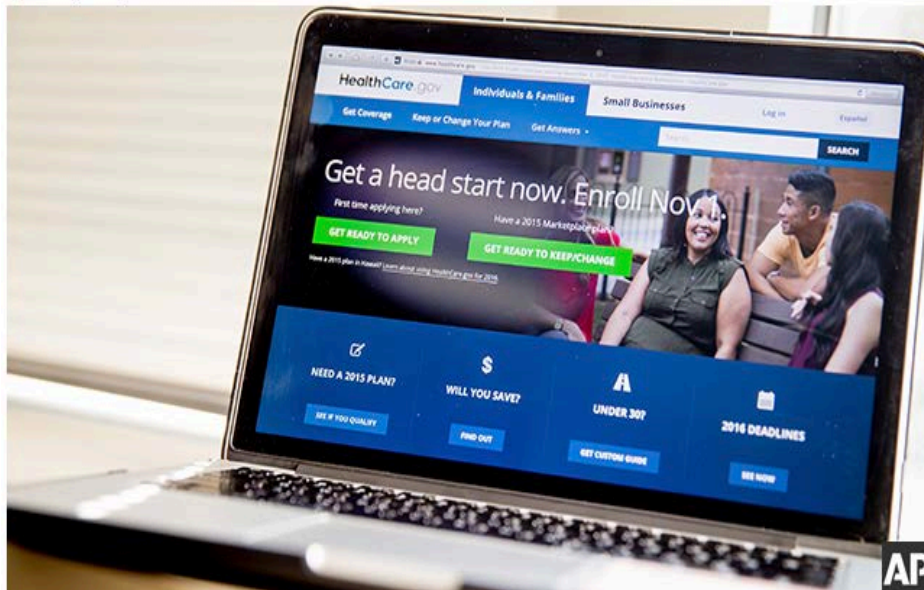


INSURANCE COMPANY NAME	COVERAGE TYPE
MEMBER NAME: JOHN DOE MEMBER NUMBER: XXX-XX-XXXX	EFFECTIVE DATE: XX-XX-XXXX
GROUP #: XXXXXX-XXX-XXX	PRESCRIPTION GROUP #: XXXXX
PCP CO-PAY: \$15.00 SPECIALIST CO-PAY: \$25.00 EMER. ROOM CO-PAY: \$75.00	PRESCRIPTION CO-PAY: \$15 GENERIC \$25 NAME BRAND
MEMBER SERVICES: 1-800-XXX-XXXX CLAIMS/INQUIRIES: 1-800-XXX-XXXX	

## Looking Ahead To 2018: Will A Shorter Open Enrollment Period Reduce Adverse Selection In Exchange Plans?

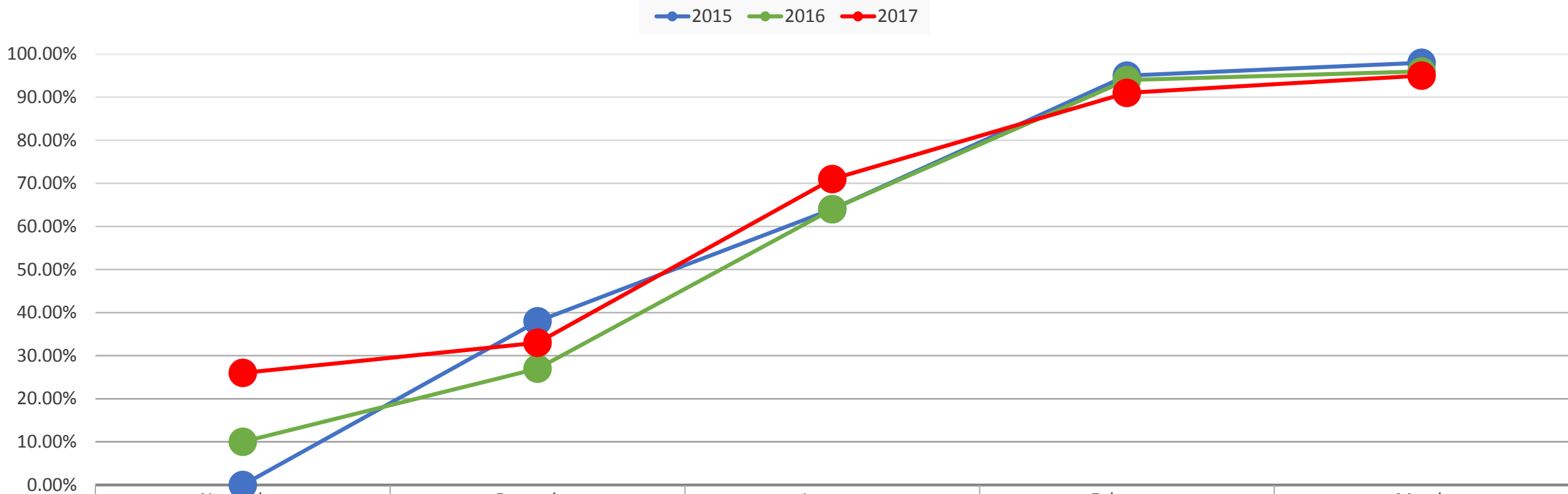
Paul Shafer and Stacie Dusetzina

April 14, 2017



- Avoiding adverse selection is an obvious concern for insurers, but **limiting enrollment periods could also potentially reduce enrollment by younger and/or healthier individuals** — a group critical to balancing the risk pool and lowering (or at least slowing the growth of) premiums in exchange plans.
- Although our findings are descriptive, they suggest that **reducing the length of the open enrollment period in 2018 may cause as much or more harm for consumers** (e.g., reduced plan switching among re-enrollees, lower enrollment among those eligible but previously uninsured) **than any potential reduction in adverse selection for insurers**

# QHP NEW ENROLLEES, Cumulative, 2015-2017



	November	December	January	February	March
2015	0%	38%	64%	95%	98%
2016	10%	27%	64%	94%	96%
2017	26%	33%	71%	91%	95%

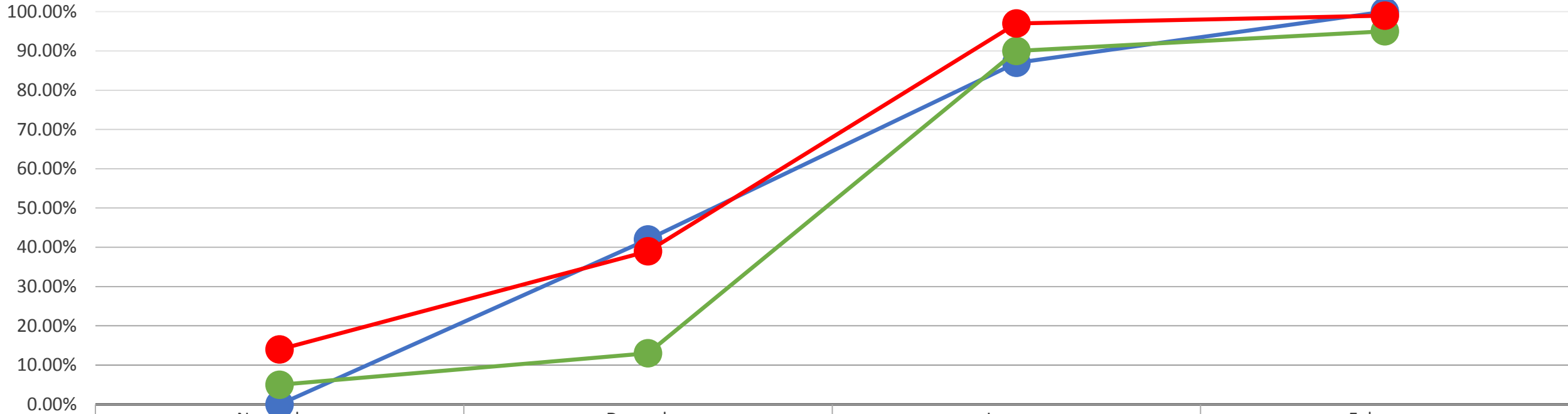
OE CY2015 | November 15, 2014 – February 15, 2015

OE CY2016 | November 1, 2015 – January 31, 2016

OE CY2017 | November 15, 2016 – January 31, 2017

OE CY2018 | 11/1/17 – 12/15/17

# QHP RENEWALS, Cumulative, 2015-2017



	November	December	January	February
2015	0%	42%	87%	100%
2016	5%	13%	90%	95%
2017	14%	39%	97%	99%

2015 2016 2017

OE CY2015 | November 15, 2014 – February 15, 2015

OE CY2016 | November 1, 2015 – January 31, 2016

OE CY2017 | November 15, 2016 – January 31, 2017

OE CY2018 | 11/1/17 – 12/15/17

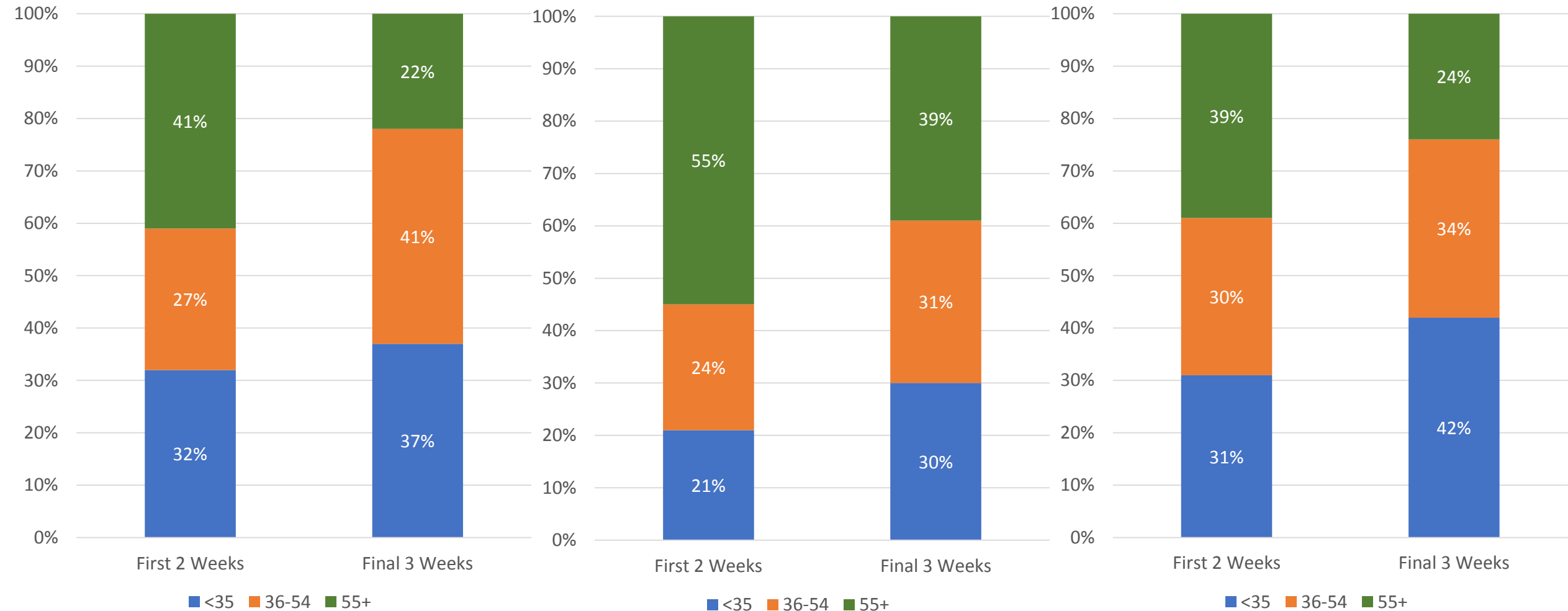


# Comparing 1<sup>st</sup> Two Weeks vs. Last Three Weeks, By Age, QHP Enrollment Only

OE2015

OE2016

OE2017

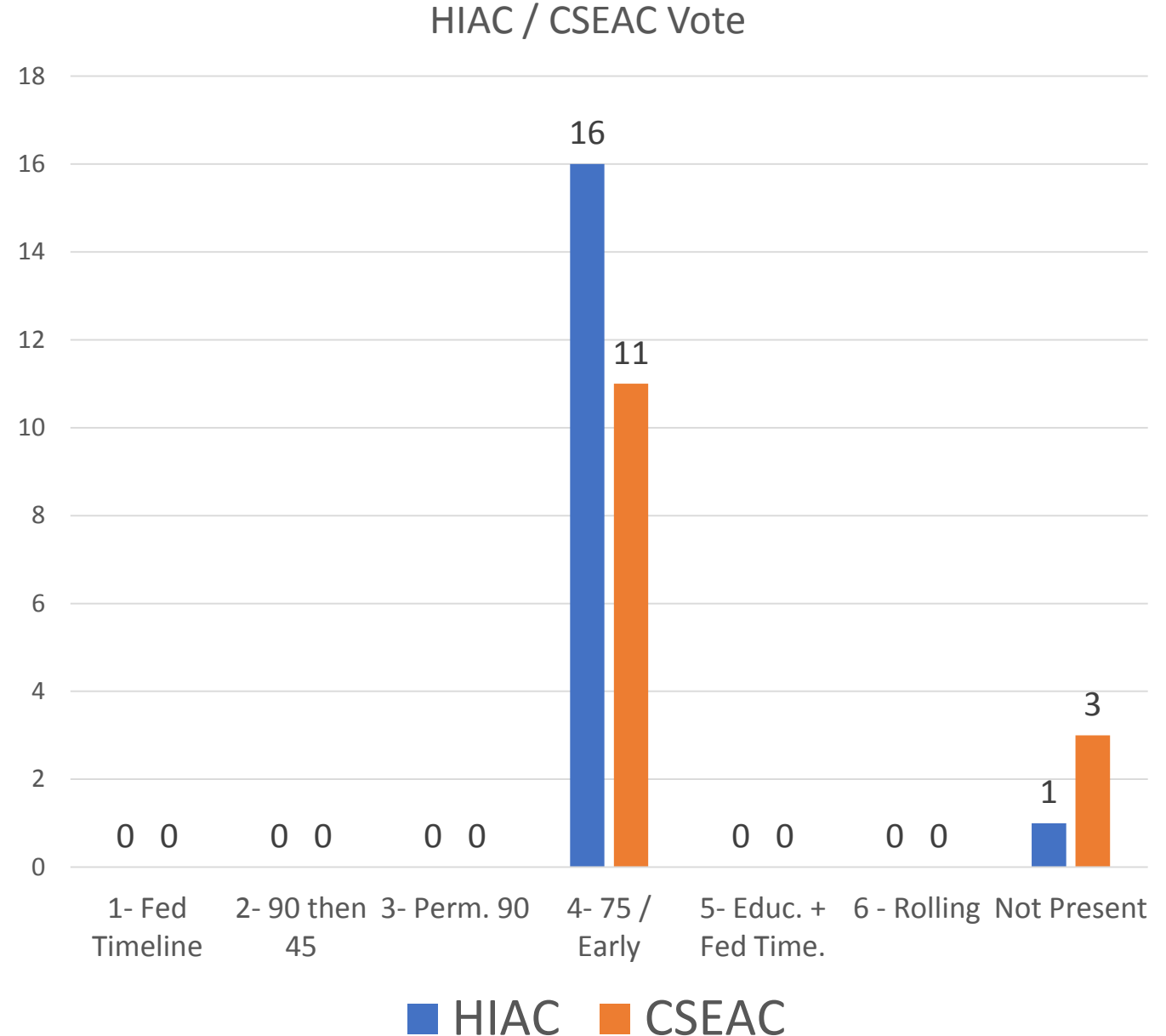


# Open Enrollment Options

	September		October		November		December		January		TOTAL DAYS
#1 - Adopt Federal Timeline											45
#2 – Maintain 90 days for CY2018 Only									2018 Only		90 – 2018 45 – 2019+
#3 – Keep Previous											90
#4 – “Start early, finish early” & 75 days											75
#5 – “Education period” + Fed Timeline											45
#6 - Rolling	<i>Throughout the year – OE=30 days before birthday</i>										30

# Recommendation

- The CSEAC and HIAC recommend that MNsure adopt a 75-day open enrollment period for coverage years 2018 and beyond. (Option #4)
- Open Enrollment would begin on October 1 and end on December 15 of every year.
- The MNsure Board would declare a "special enrollment period" prior to (from October 1 to 31) the federal Open Enrollment (November 1 to December 15)



# Policy Rationale

## Rationale Supporting Recommendation

1. Aligns with other OE periods
2. Consumers have more time to evaluate options
3. Gives health plans certainty of their enrollees two weeks prior to start of coverage year
4. Reduces likelihood of adverse selection
5. Gives MNsure time to provide carriers with enrollment data
6. Increases chances that consumer has “proof of insurance” before January 1
7. Might attract younger, healthier enrollees compared to 45 day enrollment
8. 45-day enrollment would intensify workload for Assisters, Carriers and MNsure

## Areas of Concern

1. Earlier start date and ability of consumers to project income
2. MNsure IT changes necessary to implement in 2017
3. MNsure will need to recertify all Assisters to be ready on October 1
4. MNsure training of Assisters and staff prior to October 1
5. Federal changes to ACA may impact this recommendation

# Future CSEAC & HIAC Efforts

- This is the third recommendation from the Advisory Committees over the past 18 months
- Workgroup underway to identify further improvements to MNsure's "Assister Functionality"
  - Expect recommendation in early fall
- Both the CSEAC and HIAC eagerly await additional "tasks" from MNsure Board.