

**Consumer & Small Employer Advisory Committee
Open Enrollment Timing
Recommendation**

Contacts:

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Executive Summary:

The open enrollment period for coverage in 2019 was shortened from previous years by a rule released by the federal government from roughly 90 days to 45 days. The 2018 MNsure

open enrollment period was November 1, 2017 to January 14, 2018. (The deadline to obtain a plan with a January 1 effective date was December 20, 2017; Enrollments completed between December 21 and January 14 had coverage effective February 1).

Since Minnesota operates a state-based marketplace, the MNsure Board can set an open enrollment period that is similar to or different than that federal exchanges's open enrollment period. To deviate from the 45 day period in place for 2018, the MNsure Board will need to actively pursue a change.

Recommendation:

The Consumer and Small Employer Advisory Committee (CSEAC) recommends that the MNsure open enrollment period last for 62 days (October 15, 2018 to December 15, 2018). This would be achieved by supplementing the open 2018 scheduled enrollment period, November 1, 2018 through December 15, 2018 with a special enrollment period open to all Minnesotans.

Recommendation Rationale:

The CSEAC Committee members have a number of reasons why MNsure should move their open enrollment time period up into the October time-frame. See below our rationale for this update:

- ⑩ Aligns enrollment with Medicare and other private market open enrollment periods. (Medicare's open enrollment dates are set for October 15 to December 7, 2018).

In 2015, the rules were changed about Medicare Cost plans. Medicare is doing away with Cost plans and all consumers on a Cost plan will need to switch coverage; this will effect 403,465 Minnesota consumers. The Centers for Medicare and Medicaid Services (CMS) won't allow Medicare Cost Plans (starting January 1, 2019) in counties where:

- ⑩ There were at least two competing Medicare Advantage plans available the previous year.
- ⑩ These Medicare Advantage plans had at least a minimum specified number of members during the entire previous year.

This disruption in the marketplace means that MNsure consumers as well as Medicare recipients will need extra attention from Brokers and Navigators to help them understand their options.

Also during this time period Medicare is updating and mailing new Medicare ID cards to all Medicare recipients. The new cards will not include the member's Social Security Number and instead will list a new, unique Medicare number. Cards are mailing from April 2018 to April 2019.

- ⑩ Provides consumers with more time to evaluate their options. The 4th quarter of a calendar year can be a very busy time period. Many consumers celebrate a number of national holidays during this time and giving them that extra bit of time we believe would

be beneficial.

- ⑩ Allows MNsure Brokers, Navigators and Assister additional time to work with consumers, helping them to evaluate their options and ultimately choosing a plan that will work for the consumer. Most MNsure Brokers are also certified to sell Medicare Advantage plans (see first bullet). A shorter open enrollment time period will translate to higher intensity of work for Brokers, Navigators and Assisters.
- ⑩ Allows for greater time of enrollment compared to the federal ruling in order to attract a relatively younger and healthier insurance pool. A longer enrollment period could potentially allow previously uninsured individuals who develop a condition to enroll into coverage. A longer period could ensure that procrastinators are given ample time to evaluate their options and enroll.
- ⑩ Concluding open enrollment before the start of the coverage year reduces the likelihood of adverse selection.
- ⑩ Concluding open enrollment at least two weeks prior to the end of the coverage year start date provides time for MNsure to process applications and provide carriers with the necessary enrollment data.
- ⑩ Increases the likelihood that consumers will have their ID cards before the start of the new coverage year.

Resources:

- ✦ <http://www.mnaging.org/News/CostPlans.aspx>
- ✦ <https://medicare.com/about-medicare/medicare-cost-plans-being-phased-out-in-minnesota>
- ✦ <https://www.excelsiorinsurance.com/medicare-cost-plans-ending/>
- ✦ https://www.mnsure.org/assets/2017-05-30-Looking-Ahead-2018-Health-Affairs_tcm34-297385.pdf
- ✦ <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/MedicareCard-FactSheet-TextOnly-909365.pdf>