

Special Enrollment Periods (SEPs) and Plan Administration Transfer for Reflective Silver Plan Enrollees

This document clarifies the applicability of certain enrollment policy to reflective silver plans.

- It first addresses special enrollment periods: it is important that reflective plan enrollees who qualify for an SEP understand their options for moving out of those plans and into on-exchange plans because financial assistance is not available on reflective plans.
- It next addresses the transfer of plan administration: it is important that enrollees understand their options for enrolling into reflective silver plans since on-exchange silver QHP premiums are increased to account for cost-sharing reduction program.

This interpretation applies to reflective silver plans established under [33 V.S.A. § 1813](#) as in effect on November 1, 2018.

Special Enrollment Periods:

Special enrollment periods (SEPs) apply to enrollment in qualified health plans (QHP), both through VHC and through issuers, as well as enrollment in reflective silver plans. Under [33 V.S.A. § 1811](#), “A registered carrier enrolling individuals in health benefit plans, including reflective silver plans, directly shall comply with all open enrollment and special enrollment periods applicable to the Vermont Health Benefits Exchange.”

Certain SEPs are only available to existing “enrollees,” as opposed to qualified individuals newly seeking coverage. (See [71.03\(d\)\(6\)](#) “The enrollee is determined newly eligible or newly ineligible for APTC or has a change in eligibility for CSR.”) Direct enrollees in QHPs or reflective silver plans through an issuer are considered existing enrollees. As such, direct enrollees who experience a change of income or household size making them newly eligible for premium or cost-sharing assistance qualify for a special enrollment period and may apply for coverage with financial assistance through VHC.

The special enrollment period is for 60 days beginning when the change occurs. The coverage effective date is the first day of the following month when plan selection is made between the 1st and 15th of the month, or the first day of the second following month when plan selection is made between the sixteenth and the end of the month. Individuals not currently enrolled in a QHP or a reflective silver plan are ineligible for this special enrollment period.

DVHA and QHP issuers have implemented a business process to ensure direct enrollment status is considered when an individual applies through VHC outside of open enrollment.



Plan Administration Transfers:

QHP enrollees are allowed to direct enroll into the same plan or “transfer plan administration” during the plan year. In general, this option is available for enrollees who do not receive financial assistance but applied for coverage through VHC instead of through the issuer during open enrollment. This policy allows such enrollees to have their issuer take over plan administration outside of open enrollment.

DVHA encourages all silver enrollees who do not qualify for financial assistance in 2019 to enroll in reflective silver plans (or another metal level QHP, depending on their health care needs). In the event that a silver QHP enrollee does not do so during open enrollment, this policy enables plan administration transfer into the equivalent reflective silver plan outside of open enrollment. DVHA expects this to be largely unnecessary, but recognizes the need for a safeguard for unsubsidized enrollees who could get “stuck” in an on-exchange silver QHP with an increased premium.

Transferring plan administration is subject to certain parameters outlined in [other guidance](#). In particular, issuers must enroll the customer into the same plan and product, and give credit for all accumulated cost-sharing amounts paid by the customer during the plan year. The “same plan and product” includes the reflective version of a silver plan.

DVHA and QHP issuers have a business process to execute plan administration transfer. This has been expanded to include reflective transfer.