

SPECIAL ENROLLMENT

Note: *This section applies to fully insured customers. Self-funded customers may choose to amend their eligibility requirements to align with this special enrollment period for fully insured customers, at their discretion. Self-funded customers should also contact their stop loss carrier.*

Is there a special open enrollment period in response to the COVID-19 National Emergency? Updated 3/28

To assist members in accessing care in light of COVID-19, UnitedHealthcare is providing its fully-insured small and large employer customers with a *Special COVID-19 Enrollment Opportunity* to enroll employees who previously did not to enroll in coverage. The opportunity will be limited to those employees who previously did not elect coverage for themselves (spouses or children) or waived coverage. See [Notice of Special COVID-19 Enrollment Opportunity \(English\)](#) and [Notice of Special COVID-19 Enrollment Opportunity \(Spanish\)](#) document for details.

- The enrollment opportunity will extend from **March 23, 2020, to April 13, 2020**. Effective date is April 1.
- Customers are not required to adopt the *Special COVID-19 Enrollment Opportunity*. Because of this, no opt out action is required on their behalf. UnitedHealthcare realizes each situation is unique, and each customer must make their own decisions on the enrollment opportunity.
- Dependents, such as spouses and children, can be added if they are enrolled in the same coverage or benefit option as the employee. (Includes domestic partners in states where covered).
- Standard waiting periods will be waived; however, existing eligibility and state guidelines will apply.

Which products are in scope for the SEP? Updated March 28

The SEP is limited to medical, pharmacy, dental and vision. All other products are not part of the special enrollment program.

What are the next steps if brokers, consultants and/or customers want to take advantage of the SEP period?

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Some of our products and networks have different features and as a result different guidelines and protocols are applicable to them. Please contact your UnitedHealthcare account representative for additional details.

Last updated 4/7/2020

- Review the *Notice of COVID 19 Special Open Enrollment Period*. English and Spanish versions are available.
- Enrollment updates can be submitted via Employer eServices with a 4/1/20 effective date.
*Note: For customers on All Savers, NICE, SIERRA or PULSE platforms, who do not use Employer eServices, regular employer portals can be utilized.
- Member enrollments can also be made via your regular channels if eServices is not used, which may include the Client Services Operations (CSO) team, GA Service Inbox, Electronic Data Interchange (EDI) feed, maintenance eligibility file via a Third Party Administrator (TPA), all with a 4/1 effective date.
- For brokers, consultants and employers who wish to use enrollment forms, please use the following process steps:
 - Make sure the enrollment form indicates “**Special Enrollment COVID-19**” for the qualifying event reason anywhere on the form.
 - Make sure the enrollment form has a signature date on it. As long as that signature date is there and it’s within the time period of the SEP it will be accepted.
 - Be sure to use the 4/1/2020 effective date.

What can the employer offer during the special open enrollment? New 4/3

UnitedHealthcare has extended the COVID-19 Special Enrollment Period (SEP) to April 13, and employers* with multiple plan options also can buy down to a leaner plan. Options include:

Add a special open enrollment for members who previously waived coverage, including dependents, to provide additional access to care. Employers can do this without introducing any new plans from March 23 – April 13 (extended from April 6). Employers will continue to contribute to the cost of the coverage, and coverage will be effective April 1.

1. Buy down to a leaner plan:

- Employers with a single-benefit offering that wish to buy down to a leaner plan may do so between now and May 31. They also can re-enroll their population to the leaner plan design.
- Employers with multi-option plan designs can temporarily buy down to a leaner plan. If employers decide to conduct a SEP when adding the plan, *new enrollees* who previously waived coverage can select from any of the plans offered by the employer provided they are eligible and the employer contributes to the cost of coverage. *Existing members* can also move to the lean plan design, but no other benefit changes are permitted.

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2. **Add a lean plan design but no SEP:** Consistent with the buy-down approach, employers will have until May 31 to add a lean benefit. In that instance, *existing members* can move to the new lean plan design. No other benefit changes are permitted. New enrollees previously waiving coverage are excluded beyond the April 13 cutoff for SEP.

Is the Special Enrollment Period (SEP) compliant with Section 125 Premium Only Plans?

The IRS has not yet provided an opinion on this issue. We have advised our customers to speak with their tax and benefits counsel.

Are Small Business Customers subject to material modification rules?

No, employers are allowed to pass on the 60 day rule for material modification, through the COVID emergency order during this time of need.

Can self-funded customer set their own dates on a special enrollment?

ASO has no retroactivity limitations, so if the customer wanted to open their own SEP during a different time frame, or submit the enrollment late, UnitedHealthcare will be able to process the enrollment based on the dates determined by the self-funded customer.

If an insured employer has only a single benefit plan, but wants to change the plan mid-year to a leaner plan design to save money will UnitedHealthcare allow it? Update 4/6

Yes. Between March 23rd and May 31st, employers have one chance to buy down their benefit plan. The group's effective date will not change, and the new plan will become effective between April 1 – June 1, depending on timing of plan change request. Follow standard off-cycle plan change process.

Can a multi-option employer add an additional lean plan design and conduct a Special Open Enrollment? Update 4/6

Yes, between March 23rd and May 31st, we will not impose any fully insured policy limitations on employer/plan sponsors who want to:

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1. allow new enrollees (i.e. eligible individuals that previously declined group coverage during open enrollment) the opportunity to enroll in any plan option available under the employer/plan sponsor's benefit offerings, and/or
2. allow existing enrollees (i.e. those who are currently enrolled in a benefit offering) the opportunity to change their prior election and enroll in a newly added leaner plan design.

As always, we encourage plan sponsors to review any changes to their plan with their employee benefit plan counsel and/or tax advisor. The group's effective date will not change, and the new plan will become effective between April 1 – June 1, depending on timing of plan change request. Follow standard offcycle plan change process.

What about employers who wish to add a lean plan design but do not want a SEP?

Consistent with the buy down approach, employers will have until May 31st to decide if they wish to add a lean benefit. In that instance, existing members may move to the new lean plan design. No other benefit changes will be allowed. New enrollees previously waiving coverage are excluded beyond the 4/13 cut off for SEP.

What are the key effective dates for groups deciding to move to a leaner plan? New 4/6

Plan Change Effective Date	Group Buy-down Decision Date	Enroll by Date
4/1 effective date	Through 4/13	4/13
5/1 effective date	4/14 to 5/14	5/14
6/1 effective date	5/15 to 5/31	6/8

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