

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?

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](#) document for details.

- The enrollment opportunity will extend from March 23, 2020, to April 6, 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.
- Standard waiting periods will be waived; however, existing eligibility and state guidelines will apply.
- For small employers (2-50), employers will need to verify the employee's eligibility via a wage and tax statement. This document does not need to be submitted to UnitedHealthcare.
- Existing eligibility, underwriting and state guidelines will apply.

If an insured customer has multiple plan options and opts into the Special Open Enrollment, can current members change plans?

No. The Special Open Enrollment period is NOT intended to allow members to change plan options.

The Special Open Enrollment is merely waiving policy restrictions on adding new enrollees outside of open enrollment or normal special enrollment period. The employer sponsored group health plan will decide if they want to offer the option for new entrants to the plan.

Which products are in scope for the SEP?

The SEP is limited to medical and pharmacy. 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?

- 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.

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?

Yes. During the next 90 days, and one time only, if an employer wishes to buy down their benefit plan, UnitedHealthcare will allow it. The group’s effective date will not change.

Can an insured employer add an additional leaner plan and have a Special Open Enrollment?

No, because the additional plan would need to be uniformly available to eligible classes of employees, and we are not allowing plan changes mid-year for customers with multiple plan designs, this is not available as an option.