

Batch Auto Reenrollment (BAR) and Open Enrollment (OE)

Center for Consumer Information & Insurance Oversight
(CCIIO)

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BAR Update



- The October BAR wave is scheduled to conclude on 10/31/2022 for all states for enrollments active in the FFE as of 10/1.
- BAR processing is complete in AK, AL, AR, DE, HI, IA, IN, KS, LA, MI, MO, MS, MT, NC, ND, NH, OH, OK, OR, SC, SD, UT, VA, WI, WV, and WY.
- AZ and NE are expected to begin receiving files today; FL, GA, TN & TX are expected to begin receiving files later this week.
- We expect that issuers in ND will be getting some re-BAR'ed files (changes only impact net premium and tax credit).
- As a reminder, BAR enrollments are not visible to consumers online until after the open enrollment period has ended, and only then for consumers who did not actively select a plan during OE.

- CMS sent the IOUTRC (Outreach) file to issuers on 10/7.
- These consumers are at risk of losing Financial Assistance if they do not return to the Marketplace.
- Issuer should conduct voluntary outreach and encourage consumers to return to the Marketplace.
- We expect to be sending an additional incremental IOUTRC (Outreach) file to issuers to reach out to more consumers who may be losing their APTC.

BAR Reminders for 834 Processing Teams:



- The BAR Progress Report contains the count of alternate enrollments as of 6PM ET the previous day report is sent. For example, the report sent on 10/25 will report on data through 6PM ET of the day before 10/24.
- Issuers can differentiate/identify "alternate enrollments" as follows: For alternate enrollments (row 1 from the table), the AMRC is "PASSIVE REENROLL --NEW TO ISSUER" with EFT functional code I834. (Brand new enrollment otherwise doesn't have that code.)
- A helpful refresher guide on BAR transactions is the "OE Transaction Summary", which gives examples of different BAR auto-reenrollments/alternate enrollments and the corresponding AMRC/EFT codes (slides 15-18).
https://regtap.cms.gov/uploads/library/ENR_OE2022TransactionSummary_062121_5CR_082721.pdf

Beginning of 2023 Open Enrollment



- PY 2023 Open Enrollment begins on Tuesday, November 1, 2022, and ends on Sunday, January 15, 2023.
- Issuers should encourage consumers to update their application to obtain final pricing for next year.
 - We encourage you to update your application with the Marketplace and confirm your current plan.

2023 Open Enrollment



- Your marketplace coverage will start according to the date you select a plan:

Date of plan selection for 2023 coverage	Coverage effective date
November 1 – December 15	January 1
December 16 – January 15	February 1

Missing “BAR” Transactions



- We encourage issuers to review the below criteria before opening a ticket with the Marketplace Service Desk.
 - Compare 2023 subscribers with 2022 subscribers using the FFE Member ID and other unique identifiers. In rare circumstances, the subscriber might change, but the FFE Member ID will remain the same.
 - 2023 Enrollments created after October 1st will not be BARed until the incremental BAR wave.
 - To be eligible for BAR, an enrollment must show as current in the FFE. Check the most recent Pre-Audit File to verify if the policy shows current with the FFE.
 - If issuers still have concerns that an auto re-enrollment was not received, please open a ticket with CMS_FEPS@cms.hhs.gov and include 3-5 sample 2023 application/enrollment identifiers that have not been auto renewed with an explanation of the concern.

Passive BAR and Active Selection



- When an issuer identifies a Passive Reenrollment and an Active Selection for the same consumer, the issuer should enroll the active selection and work to cancel the passive.
- Options:
 - Wait for the FFE Passive Cancel Job to run (check BARCN3 file for the passive cancelation).
 - Send a regular Cancel via IC834 at anytime for the passive reenrollment.
 - **Delivery Date:** 11/18, 11/23, 12/2, and 12/21.
 - **Delivery Code/Layout:** EFT BARCN3 jobs (IPA layout).

Cancel Carry Forward



- **Description:** Will cancel auto-reenrollments that are subsequently ineligible for BAR due to late terminations of current year Marketplace coverage. Active reenrollments or auto-reenrollments that have been updated by the enrollee will NOT be cancelled in this job, though in some scenarios the issuer may still cancel the active reenrollment (see Exchange Enrollment Manual, Chapter 6).
 - **Delivery Date:** Intermittent 11/29 and 12/15+, then twice monthly January thru March.
 - **Delivery Code/Layout:** Delivered to issuers via EFT I834's with AMRC CANCEL-CARRYFORWARD.

CIC Carry Forward



- **Description:** Carries forward to the future year enrollment changes effective after BAR
 - **Delivery Date:** 11/29, 12/5, 12/16+
 - **Delivery Code/Layout:** Sent as an Additional Maintenance Reason Code (AMRC) of CANCELCIC to be consistent with M834 operational guidance (instead of CANCEL-CARRYFORWARD).