

## 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. United stop loss policies will not cover claims paid for members enrolled during a customer's voluntary special enrollment period. Self-funded customers with other stop loss vendors should discuss coverage for any changes with their stop loss vendor before adopting any changes.*

### May a group that missed the special enrollment period in response to the COVID-19 National Emergency still offer a special enrollment? **Update 9/21**

- UnitedHealthcare sponsored a Special Enrollment Period (SEP) for our fully insured customers with employees seeking to change their benefit election consistent with the IRS Notice 2020-29 in response to COVID-19.
- That SEP took place March 23, 2020 and extended to April 13, 2020. It created the opportunity for many individuals that previously waived coverage to enroll, and for others to revoke their existing election and/or make a new health decision.
- Although we had a favorable response to this SEP, we are aware that not everybody who was eligible was able to take advantage of that opportunity.
- Under IRS 2020-29, we are continuing to honor valid enrollment requests received from our customers during calendar year 2020 that amended their cafeteria plans to permit these changes. This includes employees who previously waived coverage to enroll, employees who intend to revoke an existing election and/or to make a new health coverage election.

In the case of mid-year election requests received during calendar year 2020, we will continue to honor such requests from customers with employees who previously waived coverage to enroll, to revoke an existing election and/or to make a new health coverage decision.

- Other considerations:

Employers electing to hold a special Open Enrollment event (limited to Medical, Pharmacy, Dental, and Vision (as applicable)), may do so under the following guidelines:

- New entrants may select from existing plans
- Existing Members may change plans

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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 9/21/2020

- Employers may offer a new leaner plan design (in addition to existing plans, but not eliminating other plans) – as long as we can issue the new plan with the original effective date. The members will show the enrollment into the new plan with the OE enrollment date.

Under the DOL Final Rule Employers who have not submitted eligibility transactions due to COVID-19 may do so, retroactive to 2/1/2020 (as applicable) under the following guidelines:

- A member experienced one of the following special life events:
  - Newborn/Birth
  - Legal Adoption
  - Placement for Adoption
  - Divorce
  - Loss of coverage including:
    - Job Change
    - Reduction of hours
    - Loss of employment (not due to gross misconduct or failure to pay premiums)
    - Loss of Spouse coverage
    - Dropping of coverage due to stop of employer contributions to coverage

### Was there a special enrollment period in response to the COVID-19 National Emergency?

Updated 7/22

To assist members in accessing care in light of the COVID-19 national emergency, 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 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 extended from **March 23, 2020, to April 13, 2020**. Effective date is April 1.
- Customers were 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.
- We are aware that not everybody who was eligible was able to take advantage of the earlier special enrollment opportunity. Therefore, we will honor valid enrollment requests received from our customers that amended their cafeteria plans to permit these changes. In the case of mid-

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year election requests received during calendar year 2020, we will honor such requests from customers with employees who previously waived coverage to enroll, to revoke an existing election and/or to make a new health coverage decision.

- Dependents, such as spouses and children, can be added if they are enrolled in the same coverage or benefit option as the employee. (Included domestic partners in states where covered)
- Standard waiting periods may be waived for new and rehires; however, existing eligibility and state guidelines will apply.
- Existing eligibility, underwriting and state guidelines 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.

### **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?**

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.

*United stop loss policies will not cover claims paid for members enrolled during a customer's voluntary special enrollment period. Self-funded customers with other stop loss vendors should discuss coverage for any changes with their stop loss vendor before adopting any changes.*

### **If an ASO customer has stop loss associated with all current plans, does the employer have to set up a separate plan without stop loss to allow employees to enroll via the Special Enrollment Period (SEP)? Update 7/22**

Yes, if an employer has UnitedHealthcare stop loss associated with all current plans, the employer would have to set up a separate plan value reporting code (PVRC) without stop loss to allow

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members to enroll via SEP given that members that enroll during SEP are not eligible for UnitedHealthcare stop loss. Customers with self-funded plans covered by another stop loss carrier should speak with their stop loss vendor before making any change.

**Do the employer contributions for the members enrolling in the Special Enrollment Period have to match contributions the employer currently offers to existing members? New 4/17**

Yes, UnitedHealthcare requires the employer contribution level for those enrolling under the special enrollment to match the employer contribution for the existing members.

**What are the opportunities for fully insured clients to hold a dental and vision special enrollment? New 5/12**

**Special COVID-19 Dental and Vision Enrollment Opportunity for fully insured customers** applies to all business where UnitedHealthcare Dental and/or Vision are fully insured.

UnitedHealthcare is providing its fully insured customers with a *Special COVID-19 Enrollment Opportunity* to enroll employees who previously did not enroll in Dental and/or Vision coverage. The opportunity will be limited to those employees who previously did not elect coverage for themselves, spouses, and/or children or who waived coverage:

- The enrollment opportunity will extend from May 18 through May 29 with a June 1 effective date.
- Customers are not required to adopt the *Special Enrollment Opportunity*. Because of this, **no opt-out action is required** on their behalf. UnitedHealthcare realizes each situation is unique, and each customer should make its own decisions.
- Dependents, such as spouses and children, can be added if they are enrolled in the same coverage or benefit option as the employee.
- Existing eligibility, underwriting and state guidelines apply.
- UnitedHealthcare recommends that customers speak with their benefits counsel or tax advisors for more information as to any customer impacts.

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