

EN(ROLL)

WITH THE PUNCHES

How to Prepare for
a **Calm & Compliant**
Enrollment Season

Compliance
Dashboard®

What is Open Enrollment?

A period during which an employee (“EE”) covered under a plan can:

- Choose to be covered under another group health plan or another benefit package within the same plan
- Add or eliminate coverage of family members

When is Open Enrollment?

Small Group Market

- Insured plans: Annually from 11/15-12/15

Large Group Market

- ALE (Applicable Large Employers)
 - › No OE= may pay shared responsibility payment
 - › If the plan offers eligible Opt-Out arrangement, must obtain proof of other coverage.
- Health Care Exchanges
 - › Annual OE + special enrollment periods
 - › Must provide advance written notice of annual OE.

Who receives Open Enrollment materials?

- All eligible EE
- COBRA qualified beneficiaries
- Active EE
- New hires
- Retirees
- Spouse or dependent of deceased retiree participants
- Employees on leave: FMLA, USERRA, disability, etc.
- QMCSO alternate recipients, guardians, or legal reps
- Guardians or reps of incapacitated persons

What’s discussed at Open Enrollment?

- Benefit Plan(s) Details (SPD, SMM, SBC)
- Prescription Drug Benefits
- COBRA
- Medicare Part D
- Annual Notices: WHCRA; CHIP; ACA
- Regular Notices: ERISA (SMM); HIPAA
- Dependent/Spouse Audits

Is Open Enrollment Required?

- Not **required** under ERISA for H&W plans
- Left to the employer’s discretion

How Do I Deliver Open Enrollment Materials?

- If the Plan requires completion of enrollment = employer must provide EE with necessary forms & instructions
- Employer must supply SBC with OE materials
- COBRA eligible EE may change coverage to same extent as active EE
- No law on *how to deliver*

Open Enrollment Employer Reminders:

- ERISA requires plan documents and SPD to include information about OE
- Various notices may “piggyback” OE materials
- Medicare Part D Creditable Coverage Notice must be provided by October 15th
- The SBC must be furnished with OE materials & provided prior to renewal
- If an employee becomes eligible for the plan after the distribution of an annual notice, the employee should be given the notice on or before enrollment in the plan.
- COBRA participants can change coverage during OE to the SAME extent as active employee.

OPEN ENROLLMENT CHECKLIST

- Confirm all plan(s) details
- Determine which EEs are eligible for which plan(s)
- Decide what information to collect and what to update
- Draft enrollment forms
- Draft required - and update - existing notices
- Create benefit summaries
- Distribute enrollment kits & collection forms
- Confirm benefit elections
- Integrate enrollment information
- Review enrollment results with management