OPEN ENROLLMENT *CHECKLIST*
COVID-19 EDITION

Compliance Dashboard®

*A reminder of the tasks to be completed for a **successful, compliant open enrollment period.***

Basic Steps

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

COVID-19 Considerations

If a plan changed benefits due to COVID-19, it must communicate such changes to enrollees via notices and updated documents. Actions to consider:

- Update plan documents (SPD, SBC, and SMM, as applicable)
- Review mid-year election guidelines for Cafeteria Plans
- Verify the nature of a COBRA qualifying event
- Confirm plan coverage for HSAs
- Remind enrollees how HIPAA regulations use and disclose their PHI

Detailed Steps

- Verify dependent and spouse plan eligibility
- Distribute Annual Notices
  - WHCRA
  - CHIP
  - ACA Grandfathered Plan (if applicable)
  - Medicare Part D (by Oct. 15)
  - Summary of Benefits & Coverage (SBC)
  - Wellness Plan ADA Notice
  - Non-discrimination notice
  - Notice of alternative standard for wellness incentive
- Distribute Other Notices (verify necessity & timing: Notices Chart)
  - COBRA (similarly situated individuals)
  - Flexible Spending Account (FSA) Rx reimbursement reminders
  - Summary of Material Modifications (if applicable)
  - HIPAA Notices of Privacy Practices (every 3 years or a change)
  - Summary Plan Descriptions (update & restate)
  - Coverage notice (exchange options)
  - Breach of unsecured PHI (as applicable)
  - Adverse Benefit Determinization (claim denial)
  - Recession of coverage (retroactive term/change)
  - MCSO or NMSN (Medical Child Support Notice)