



****this meeting will be recorded for the purpose of taking minutes****



Pennie Special Board of Directors Meeting

February 2021

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Agenda

- Preliminary Matters
- Discussion of the creation of a COVID-19 Special Enrollment Period in accordance with 45 C.F.R. § 155.420(d)(9)
 - Overview of HealthCare.gov's SEP
 - Pennie's COVID-19 SEP Proposal
- Adjournment

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Preliminary Matters

- Call to Order
- Opportunity for Public Comment



Overview of the HealthCare.gov SEP



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HealthCare.gov SEP Policies

- February 15 – May 15, 2021
- Exceptional Circumstances SEP
- Available to uninsured and current enrollees
- 1st of the month effective date rule, allowing for coverage to start on the first of the month following enrollment
- 30-day SEP timeframe versus standard 60-day SEP window

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HealthCare.gov Marketing Plans

- HealthCare.gov will be conducting a nation-wide media campaign between February 15 and May 15
- This advertising campaign will touch Pennsylvania's markets
- Approximate spend will be \$50M
- Tentative: FFM to host web conference with SBMs to discuss messaging and outreach



Overview of Pennie's Proposed COVID-19 SEP



General Stakeholder Feedback

Insurers, brokers, assisters, advocates, etc.

- Generally, in support of the SEP; One producer expressed concern about potential impact on rates, however, this concern was not shared by insurers; one insurer suggested the SEP only apply to new customers
- Broad support for COVID-19 SEP to apply to off-exchange individual market; one insurer highlighted the importance for customers not eligible for assistance who may benefit from off-exchange silver products
- Strong interest in Pennie creating job aids, template messages to be broadly re-purposed and host explanatory webinar
- Recommend Pennie align marketing run dates and messages in coordination with FFM
- Minor concern expressed related to potential confusion among current customers

Policy Recommendations

Eligibility Criteria

Proposal	Policy Goal(s)	Benefits	Challenges
Uninsured and current enrollees would be eligible for this SEP	Ensure that all Pennsylvanians can access the coverage they need during the COVID-19 pandemic	<ul style="list-style-type: none"> • Alignment with FFM • Straightforward messaging • Equal access for all Pennsylvanians 	<ul style="list-style-type: none"> • Current enrollees who just enrolled may be confused

Stakeholder Feedback:

- Most supported applying to both new and current members. One insurer stated their preference was to have the SEP apply to the uninsured only.
- One commenter requested that current members changing plans be treated like any other SEP with a new plan, new benefit accumulators, and standard binder payment policies.

Staff Recommendation:

- Allow the uninsured to apply and shop for coverage.
- Allow current enrollees to change their plan and/or add additional eligible household members to their existing coverage.
- Current members changing plans will be treated like any other SEP with a new plan, new benefit accumulators, and standard binder payment policies.
- Direct messaging to current customers to minimize confusion.

Policy Recommendations

Effective Date

Proposal	Policy Goal(s)	Benefits	Challenges
1st of the month effective date rule applied across the board	To ensure Pennsylvanians have access to health coverage during a pandemic	<ul style="list-style-type: none"> • Shorter period from enrollment to effectuation • Responsive to coverage people need now • Aligns with FFM 	<ul style="list-style-type: none"> • Processing effectuations and sending plan materials

Stakeholder Feedback:

- General agreement for only prospective coverage.
- Most commenters didn't address which effective date rule to apply.
 - One insurer suggested that 15/16 rules would be easier to implement, but that 1st of the month was feasible.

Staff Recommendation:

- 1st of the month effective date rules for anyone enrolling using COVID-19 SEP.
- Prospective coverage only.

Policy Recommendations

30 Days vs. 60 Days

Proposal	Policy Goal(s)	Benefits	Challenges
Provide a standard 60-day Special Enrollment Period for applicants to enroll in coverage	To provide Pennsylvanians with the time they need to complete their enrollment	<ul style="list-style-type: none"> In-line with existing SEPs, so no operational changes required 	<ul style="list-style-type: none"> Different from FFM

Stakeholder Feedback:

- Didn't receive feedback specifically on the SEP window.
- FFM is implementing a 30-day SEP window for applicants to enroll in coverage.

Staff Recommendation:

- Provide a 60-day SEP shopping window, consistent with other SEPs.
- However, plan selection no later than June 15, in alignment with FFM.

Policy Recommendations

Off-Exchange Applicability

Proposal	Policy Goal(s)	Benefits	Challenges
Pennie supports off-exchange applicability	To align this exchange SEP with the off-exchange marketplace	<ul style="list-style-type: none"> Anyone enrolling in coverage through the individual market can utilize this SEP 	<ul style="list-style-type: none"> 45CFR§155.420(d)(9) - Exceptional Circumstances SEP is applicable to exchange-only coverage

Stakeholder Feedback:

- All insurers who provided feedback expressed a desire to have this applied to the off-exchange market.

Staff Recommendations:

- Pennie supports insurers extending this to the off-exchange market, but does not have the authority to require it. Pennie would coordinate with the Insurance Department to provide guidance as soon as possible

Operational Considerations

- System configurations and changes will need to be implemented over the next ~10 days
- Technology and Call Center changes and implementation
 - Add New Qualifying Life Events (QLEs) for 1) New Customers 2) Existing Enrollees to add Unenrolled member 3) Enrollees to add new member
 - Execute a batch job to attach an event to existing applications without enrollments
 - Enable button on customer dashboard for existing enrollees giving them the ability to shop for a new plan (won't be actively promoted)
- Leveraging existing enrollment transaction process between Pennie and the insurers to avoid new development
- Job aids and training materials to be created for call center team, navigators and brokers

Marketing & Messaging Proposal

- Messaging
 - Broad - Limited time enrollment opportunity; open for all, with focus on the uninsured; importance of coverage during the pandemic; coverage of COVID-19 testing, treatment and vaccination; plan to align with FFM as more information becomes known
 - To current customers – no need to do anything to your account unless you want; your coverage has not been impacted
- Budget
 - \$2.5 million mid- February through May
 - Funded through existing advertising budget and carryover from 2021 OEP campaign
 - Campaign costs include creative development
- Media Allocation
 - Target Audiences - the uninsured, recently unemployed, disproportionately underserved communities, geographical area where COVID-19 has been more prevalent, contextually based on engagement with COVID-19 content
- Media mix - Heavily digital (OTT, YouTube, online video, streaming audio, programmatic display, search and social); Cable TV, Spanish terrestrial radio, Spanish print
- Other Efforts
 - Earned media - press releases and media pitching
 - Owned - Update pennie.com, add customer FAQs, Pennie podcast Q & A, mention in upcoming newsletters
 - Partners - Provide broker/assisters/insurers/partners with job aids, talking points, shareable content via social press kit; general partner activation for amplification
 - Targeted emails to those without active enrollments; emails to those that begin shopping with SEP

Adjourn

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