

How States Are Increasing Coverage through Special Enrollment Periods

By: Adney Rakotoniaina

Absent a pandemic, enrollees usually sign up for insurance coverage during the annual open enrollment period, from Nov. 1- Dec. 15. However, under extenuating circumstances, consumers can sign up during a special enrollment period (SEP). The Affordable Care Act defined a set of events that trigger SEPs nationally (view a national [list](#) of SEPs), but state-based marketplaces have limited discretion over when to schedule additional SEPs for their consumers. Many have enacted SEPs in response to the COVID-19 pandemic to give uninsured residents an opportunity for coverage, which reduces financial barriers in the event they need medical care. Below is a list of the unique SEPs available in state-based marketplaces, including life-changing events, unexpected health plan changes, or enrollment in dental coverage.

What Events Qualify for a Special Enrollment Period in State-Based Marketplaces														
Qualifying Event	CA	CO	CT	DC	ID	MD	MA	MN	NV	NY	RI	VT	WA	
Special Enrollment Periods (SEPs) triggered by unique life events:														
Loss of coverage upon leaving military service	x													
Loss of "hardship exemption" (exemption from individual mandate penalty)	x			x			x					x		
A change in disability status	x								x					
Pregnancy (self-attested or requiring verification)			x	x		x				x		x		
Newly eligible for state coverage because of change in income							x							
Beginning or end of state hardship waiver that reduces or waives premiums							x							
SEPs triggered due to insurance market changes:														
Health insurance plan became decertified during the coverage year	x		x											
Provider left health plan network while enrollee was receiving care or treatment for illness	x													
SEPs due to eligibility/ reconciliation issues:														
Was conditionally approved for Medicaid during open enrollment period (OEP) or SEP, but was ultimately denied and received denial notice after the OEP/SEP ended	x			x				x					x	
Enrollee was automatically renewed into a different plan without forewarning because original plan was no longer offered				x										
Consumer's employer was going to enroll employees in SHOP coverage, but was denied because too few employees selected coverage				x										
Tax filer learned of state/district individual mandate during tax season or was assessed a tax penalty through the mandate	x			x							x			
SEPs due to technical issues or extenuating circumstances:														

Loss of coverage due to the failure of a provider/provider-funded third party to pay enrollee's premium on a timely basis (effective 7/1/2020)	x												
Termination of coverage caused by a problem with automatic payment (e.g., because credit card was discontinued because of fraudulent activity)	x			x									
Acts of foreign or domestic terror prevented enrollee from meeting enrollment deadlines	x												x
SEP triggered in the event of a public health emergency*	x	x	x	x		x	x	x	x	x	x	x	x
Customer's enrollment issue (non-system error) was not resolved before the end of OEP	x		x					x					x
SEPs triggered by fraudulent coverage:													
Purchased fraudulent coverage policy through Simple Health insurance company (temporary; expired)	x		x	x	x	x	x	x					
Bought other fraudulent coverage (e.g., coverage that misrepresented itself as comprehensive coverage)													x
Member of Aliera "health-sharing ministry" and wished to switch to comprehensive plan (temporary; expired)		x						x					
SEPs for enrollment in dental plan:													
Consumer is newly eligible for Medicaid or qualified health plan, enrolled in SHOP, or gained access to an excepted benefits health reimbursement arrangement and otherwise lacks dental coverage							x						
Open SEP to purchase dental coverage								x					
Loss of other dental coverage												x	

Updated March 27, 2020

*Time-limited SEPs created in response to the COVID-19 national emergency. These SEPs are open during the following periods.

CA- 03/20/20 - 06/30/20

CO- 03/20/20 - 04/03/20

CT- 03/19/20 - 04/02/20

DC- 03/18/20 - 06/15/20

MD- 03/16/20 - 04/15/20

MA- 03/11/20 - 04/25/20

MN- 03/23/20 - 04/21/20

NV- 03/17/20 - 04/15/20

NY- 03/16/20 - 04/15/20

RI- 03/14/20 - 04/15/20

VT- 03/20/20 - 04/17/20

WA- 03/09/20 - 04/08/20