

# Brief Notes

NEWS FOR BROKERS & CONSULTANTS

**Applies to:** Pre-ACA Small Group plans with 4th quarter 2020 renewals

## **Grandmothering Extended Into 2021 for Pre-ACA Plans**

Horizon Blue Cross Blue Shield of New Jersey is pleased to advise that groups with health plans that preceded the Affordable Care Act (“pre-ACA plans”) and that renew between **October 1 and December 31, 2020**, will be permitted to renew within those pre-ACA plans. With the fourth quarter representing our highest volume of renewing membership, our decision to grandmother pre-ACA plans will facilitate a smooth renewal process.

If a group leaves its pre-ACA plan, it must move to an ACA-compliant policy with stand-alone pediatric dental (SAPD) coverage. Popular ACA-compliant options include our OMNIA<sup>SM</sup> Health Plans.

Horizon BCBSNJ will communicate to you and your impacted groups the important details and dates regarding the renewal process. Here’s what you can expect:

### **Broker Communications**

- October, November and December pre-ACA and ACA renewals will be available to the Broker of Record via the FTP secure site. An email notification will be sent once a renewal is available.
- Renewals will be released according to the following schedule:
  - October renewals – no later than July 31
  - November renewals – no later than August 31
  - December renewals – no later than September 30

### **Group Communications**

- ACA renewals for October, November and December: Renewals will include recommended ACA plans to which each group can be mapped.
- Pre-ACA renewals for October, November and December: Renewals will include a pre-ACA renewal indicating that they may renew as is, as well as a suggested ACA plan to which each group can be mapped. A CMS Model Notice will also be included.
- Renewals will be released according to the following schedule:
  - October renewals – no later than July 31
  - November renewals – no later than August 31

- o December renewals – no later than September 30

Note:

- If a group does not actively select an ACA plan, it will automatically renew as is within its existing pre-ACA product.
- For all groups that select an ACA plan, please submit the ACA conversion through [Broker Online Services](#).

### Pre-ACA to ACA Plan Conversions

All groups converting from a pre-ACA plan to an ACA plan are required to send in the conversion form, new certification paperwork, including applicable tax documentation as noted below, and waivers.

### Mandatory Tax Documentation for Groups with Two to Five or 45+ Eligible Employees

These requirements apply to all pre-ACA to ACA conversions regardless of whether they previously sent their certification to Horizon BCBSNJ and were advised by Horizon BCBSNJ Small Group Certification they could renew as is.

Group Structure	Form	Additional Documentation
Single Owner/ Sole Proprietor	Schedule C	Q3 2020 WR-30 for employees
Partnership (must be 100% ownership)	K-1(s)	Q3 2020 WR-30 for employees
Corporate Entities (C- and S-corps)	Schedule G for 2018	Q3 2020 WR-30 for employees
All Groups		NJ State WR-30: Most recent completed quarter for all employees <sup>1</sup>
These requirements apply to all pre-ACA to ACA conversions regardless of whether they previously sent their certification to Horizon BCBSNJ and were advised by Horizon BCBSNJ Small Group Certification they could renew as is.		

WR-30 = Quarterly Wage Report

<sup>1</sup> Effective **October 1, 2020** and after, third quarter WR-30s will be required for fourth quarter 2020 conversions.

Groups of six to 44 eligible employees do not need to submit tax documents, but rather the Certification with Conversion form and waivers.

Conversion paperwork should be sent to our Conversions department at [Conversion@HorizonBlue.com](mailto:Conversion@HorizonBlue.com), not to Horizon BCBSNJ's Certification department.

## **Certification Paperwork Submission**

Horizon BCBSNJ sends certification paperwork at least 120 days prior to a group's renewal. Groups are instructed to complete and return the required paperwork to Horizon BCBSNJ within 15 days of receipt. At that time, the group will not have received its renewal, and therefore will not have determined if it will renew as is into the existing pre-ACA plan or move to an ACA plan. New certification paperwork, including waivers and tax documents (as outlined above), is required with the conversion paperwork for groups converting from pre-ACA to ACA plans. This is required for groups of five and under and 45 or more eligible employees. It also helps us in closely monitoring that husband/wife, sole proprietor and owner-only-enrolled groups are renewing as is in a pre-ACA plan and not converting to an ACA plan; these groups are not eligible for ACA plans.

As always, the conversion deadline for renewing groups or off-anniversary conversions is five business days prior to renewal date. If a group accepts its existing pre-ACA or ACA plan renewal, no paperwork is necessary. Conversion paperwork is only required if a group converts to a completely different ACA plan alternative or if it moves from a pre-ACA plan to an ACA plan.

Complete paperwork must be submitted in a timely manner. Conversions without all required documentation may lose their requested conversion date and may be moved to the next month.

If you have questions, please contact your Horizon BCBSNJ sales executive or account manager.