

# Retroactive Claim Denials

FCL does not request claim payment refunds for claims paid when an enrollee's termination date is adjusted retroactively unless the enrollee is terminating coverage with FCL and enrolling in a dental plan with a new issuer. In all other circumstances, once a termination date is placed on an enrollee's membership record, claims are processed or denied based on that date moving forward.

However, if an enrollee terminates coverage with FCL and enrolls with a new dental plan issuer on the Marketplace, FCL will request a refund from the provider for any claims paid after the retroactive termination date. The provider is responsible for refunding the member for payment of any cost shares.

Providers are responsible for billing the new issuer for any covered services incurred and paid after the retroactive enrollment date, and FCL instructs providers that they only collect the cost sharing for the covered service to reflect the enrollee's cost-sharing obligation for the service under the new issuer.

Such an adjustment may result in the enrollee owing the provider additional funds, depending on the cost sharing and benefit structure of the new plan. FCL advises providers that any refund or credit for any excess cost sharing must be provided (or begin to be provided in the case of a credit) within 45 calendar days of the date of discovery of the excess cost sharing.

In the case of premium paid for or on behalf of the enrollee, any refund or credit for any premium paid for or on behalf of the enrollee will be provided (or begin to be provided in the case of a credit) by FCL within 45 calendar days of the date of discovery of the excess premium paid.