

Date: September 11, 2015

Subject: Guidance on the Special Enrollment Period for Florida Full-Pay Healthy Kids Enrollees

The Centers for Medicare & Medicaid Services (CMS) is committed to addressing the health needs of children. Consistent with this commitment, it is providing a special enrollment period for Health Insurance Marketplace coverage to enrollees of Florida's Full-Pay Healthy Kids Program who are ending their coverage in the Full-Pay Healthy Kids Program due to significant program changes that take effect on October 1, 2015.

Florida's Full-Pay Healthy Kids Program Changes

The Florida Full-Pay Healthy Kids program is the state's Children's Health Insurance Program (CHIP) Buy-in program. The Full-Pay Buy-In is available to Florida residents, ages 5-18, whose household income is above the state's CHIP eligibility level of 210 percent of the federal poverty level (FPL). Families of children enrolled in Florida's Full-Pay Healthy Kids Program pay the full-cost of the premium for coverage and cost-sharing that is similar to the state's title XXI funded CHIP program.

In 2014, Florida's Full-Pay Healthy Kids Program submitted an application to CMS to be recognized as Minimum Essential Coverage (MEC). CMS approved the application in May 2015 and agreed to provide a retroactive MEC designation back to January 1, 2015 if the state made significant program changes, including, but not limited to, eliminating of lifetime dollar limits on benefits. Accordingly, Florida's Full-Pay Healthy Kids Program made substantial changes to both the program benefits and premium levels, which take effect on October 1, 2015, the start of the program's 2016 benefit year. These changes do not apply to the state's federally-funded CHIP, which is already considered MEC.

Special Enrollment Period

Due to the timing and nature of the Florida Full-Pay Healthy Kids Program changes, CMS has determined that current Full-Pay Healthy Kids Program enrollees meet the criteria for a Marketplace special enrollment period. This special enrollment period will be available for the 60 days between October 1, 2015 and November 30, 2015. To avoid a potential gap in coverage for current Florida Full-Pay Healthy Kids enrollees, CMS is offering advanced availability of this special enrollment period so that eligible consumers who enroll in a plan on or before September 30, 2015, will receive an October 1, 2015 coverage effective date. Consumers who select a plan between October 1, 2015 and November 30, 2015, will receive a coverage effective date of the first day of the month following plan selection. Eligible individuals will have access to this special enrollment period through both HealthCare.gov and the Marketplace Call Center 1-800-318-2596 (TTY: 1-855-889-4325) and will receive a special enrollment period with a 209 eligibility reason code.