

LIFE & HEALTH

To: All Insurers of Health Benefit Plans in the Small Employer Group Health Insurance Market

From: Life and Health Division

Date: December 4, 2013

Re: Small Group Supplemental Guidance on NCDI's 11/15/13 Advisory Memorandum on Federal Transitional Policy

As a follow up to NCDI's Advisory Memorandum issued on 11/15/13, please note:

1. Insurers have the option to offer re-enrollment under the federal transitional policy in the small group market, and the expedited review process as outlined in the Department's November 15 Advisory Memorandum will apply to the related regulatory filings.
2. Insurers may find it necessary to offer small group policyholders the option to extend the current small group policy term in order to have additional time to implement the offering of transitional small group policy re-enrollment to all impacted small group policyholders in a market. An insurer may offer an option to existing small group policyholders with renewals set in the first quarter of 2014 to extend the current small group policy term until no later than midnight on April 30, 2014 in order to give such insurer sufficient time to implement and offer the transitional small group policy re-enrollment for effective dates no later than May 1, 2014.

In exercising #2, the insurer will agree to not make any change to a small group policyholder's premium rate for the extended period, and will extend the affected small group policy's term for the stated time period, including recognizing and continuing any cost-sharing achieved by the insureds under the affected small group policy prior to the term extension.

Insurers wishing to exercise this option under #2 are encouraged to contact the Life and Health Division to discuss specifics. Please contact Jean Holliday as instructed below.

Any questions relating to this guidance should be directed to Jean Holliday at jean.holliday@ncdoi.gov or 919-807-6061.