



**DEPARTMENT OF INSURANCE, FINANCIAL
INSTITUTIONS AND PROFESSIONAL REGISTRATION**

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INSURANCE BULLETIN 10-06

Open enrollment periods for carriers issuing child-only policies

Issued Oct. 12, 2010

- To:** All insurers authorized to conduct health insurance business in Missouri
- From:** John M. Huff, Director
- Re:** Open enrollment periods for carriers issuing child-only policies

The Affordable Care Act provides that carriers that issue group or individual coverage may not impose pre-existing condition exclusions for children under age 19 for policies beginning or renewed on or after Sept. 23, 2010. The PPACA does not prohibit the carrier from assessing premium based on the health of the child. As a result of these changes, several of the major health insurance carriers in Missouri have stated their intent to withdraw from the state's child-only policy market.

The department expects carriers in the individual health insurance market to provide guaranteed issue coverage to children throughout the year. Alternatively, carriers in the individual market may provide an open enrollment period for children under age 19 on a guaranteed issue basis without any pre-existing condition exclusions. [HHS has issued guidance](#) stating that carriers in the individual market may restrict enrollment of children under age 19 to specific open enrollment periods if allowed under state law.

Missouri law permits carriers to create specific open enrollment periods. Should carriers elect to do so, the department expects carriers issuing child-only policies on or after Sept. 23, 2010, to hold a transitional open enrollment period from Sept. 23 to Dec. 31, 2010, with coverage effective the first of the month following the date of application. During this open enrollment period, all children under the age of 19 shall be offered coverage on a guaranteed issue basis, without limitations or riders based on health status.

The department also expects such electing carriers to hold a yearly open enrollment period during the month of March each year, beginning March 1, 2011, with an effective date of April 1 of the same year. These open enrollment periods will not limit the ability of carriers from enrolling children at other times, if a qualifying event occurs, such as birth, adoption, death, marriage or divorce. Carriers electing to create an open enrollment period are still prohibited from applying pre-existing condition exclusions for children under 19 outside of these open enrollment periods.

If you have any questions regarding this communication, please contact Jamie Morris in the Market Regulation Division at 573-751-3365 or James.Morris@insurance.mo.gov.