

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
Center for Consumer Information and Insurance Oversight
200 Independence Avenue SW
Washington, DC 20201



Date: December 24, 2015

Subject: Guidance on the Special Enrollment Period for Compact of Free Association (COFA) Migrants in Hawaii

The Centers for Medicare & Medicaid Services (CMS) is committed to addressing the health insurance needs of all qualified individuals through the Health Insurance Marketplace (Marketplace). Consistent with this commitment, CMS is providing a Special Enrollment Period for Marketplace coverage to Compact of Free Association (COFA) migrants in Hawaii who have experienced particular difficulty enrolling in coverage due to unique language barriers and the consumer actions required in order to enroll in or maintain coverage for 2016 since Hawaii has transitioned from a State-based Marketplace (SBM) to a State-based Marketplace using the Federal Platform (SBM-FP).

Hawaii's Marketplace Changes and COFA Migrants

Hawaii has transitioned from an SBM to an SBM-FP for the 2016 benefit year. In order to be enrolled in Qualified Health Plan (QHP) coverage for 2016, Hawaii consumers who wish to enroll in Marketplace coverage, including 2015 Marketplace enrollees, must complete a new application and enroll in coverage through the Federal Platform during the Marketplace Annual Open Enrollment Period. This can be confusing for consumers who need to access a new website and/or Call Center to assist them with completing this process. The deadline to enroll in coverage effective January 1, 2016 and avoid a gap in coverage was December 17, 2015.

COFA migrants in Hawaii face an additional level of complexity enrolling in 2016 coverage due to significant language barriers that have elongated and sometimes prevented the successful completion of Marketplace applications and enrollment into coverage. COFA migrants, who are from the Federated States of Micronesia, the Marshall Islands, and Palau, speak a diverse set of languages that are not commonly spoken elsewhere in the United States. Since many COFA migrants do not speak English or Spanish, interpreters are needed to assist COFA migrants with completing Marketplace applications.

In addition, some COFA migrants are facing additional barriers verifying their identity when attempting to create Marketplace accounts because they lack credit histories and there are no electronic records available to verify either their identity or annual household income. This adds to the number of actions needed and time it takes for them to successfully complete their Marketplace applications.

Special Enrollment Period

Due to the language barriers faced by the COFA migrant population, which are exacerbated by Hawaii's transition from an SBM to an SBM-FP, CMS has determined that COFA migrants residing in Hawaii meet the criteria for a Marketplace Special Enrollment Period for January 1, 2016 coverage. This Special Enrollment Period is intended to provide additional time for COFA migrants to enroll in 2016 coverage and will be available for 60 days between December 18, 2015 and February 15, 2016. To avoid a potential gap in coverage for current COFA migrant enrollees and to provide fair access to January 1 coverage for new COFA migrants, CMS will offer a January 1, 2016 coverage effective date to those who enroll during the Special Enrollment Period. Eligible individuals may access this Special Enrollment Period through Marketplace Call Center 1-800-318-2596 (TTY: 1-855-889-4325). Issuers will receive an enrollment reason code of EX.