

Commissioner of Securities and Insurance


Troy Downing
Commissioner



Office of the
Montana State Auditor

INFORMATIONAL BULLETIN

To: Health Insurers providing Non-Grandfathered/Transitional Coverage in the Small Group and/or Individual Market

From: Troy Downing 
Montana State Auditor, Commissioner of Securities and Insurance

Re: Bulletin from the Centers for Medicare & Medicaid Services¹ - *Insurance Standards Bulletin Series - INFORMATION - Extension of Limited Non-Enforcement Policy through 2022*

Date: February 23, 2021

NON-GRANDFATHERED/TRANSITIONAL POLICY

On January 19, 2021, the Centers for Medicare & Medicaid Services ("CMS") issued a Bulletin extending its non-enforcement policy regarding non-grandfathered transitional policies that do not meet certain ACA market reform requirements ("Bulletin"). CMS will not act against these plans for non-compliance with the specified market reforms for policy years beginning on or before October 1, 2022, provided that all such coverage comes into compliance by January 1, 2023.

The Montana State Auditor, Commissioner of Securities and Insurance ("CSI") has adopted the CMS transitional policy for individual and small group policies through 2022. Health insurance issuers must comply with the requirements and terms in the Bulletin.

See the Bulletin at: <https://www.cms.gov/files/document/extension-limited-non-enforcement-policy-through-calendar-year-2022.pdf>

The Bulletin will be posted on the CSI website at www.csimt.gov and placed in the System for Electronic Rates & Forms Filing (SERFF).