

December 9, 2016

#A16-277

For More Information: Agent Service Center
800-267-3156

March Renewal Packages for Small Groups Will Include New Information on their Options

Sales Audience: Small Groups

Starting with March 1, 2017 renewals, Small Group employers that are enrolled in non-grandfathered, pre-ACA (Affordable Care Act) plans—also known as Transitional Relief/KYP or “grandmothered” plans—will receive additional information on their options at their renewal. Since Transitional Relief is expiring on December 31, 2017, Small Groups in grandmothered plans will have the following options at renewal time:

- Small Groups with employees in grandmothered plans only:
 - **Option 1:** Keep their grandmothered plan(s) for a contract year of less than 12 months
 - **Option 2:** Switch to a plan(s) that includes ACA benefits
- Small Groups with employees in both grandfathered and grandmothered plan(s):
 - **Option 1:** Keep their grandmothered and grandfathered plan(s) with the grandmothered plan(s) having a plan year less than 12 months
 - **Option 2:** Keep only the grandfathered plan(s) and move all of their employees into that plan(s).
 - **Option 3:** Switch to a plan(s) that includes ACA benefits

Extended Contracts for Groups Renewing in 4Q 2016

As a reminder, a group that have renewals in 4Q 2016 have the option to renew into their grandmothered plan for a contract year of longer than 12 months. For more information about extended year contracts, please see the Extended Contract Year Agent Bulletin (A16-161).

Small Group Renewal Packages—Employers

In their March 1, 2017 renewal package, employers will receive the following:

- **Renewal letter** that has been updated to include more information about their plan renewal options and the implications of each choice. Below are the samples of the updated renewal letters:
 - [2017 Voluntary Migration Renewal Letter](#) – For employers that have all employees in a grandmothered plan
 - [2017 Voluntary Migration Renewal Letter](#) – For employers that have some employees in a grandfathered plan and some employees in a grandmothered plan
 - [2017 Voluntary Migration Renewal Letter](#) – For employers that have employees in a Small Group Grandmothered plan, although they have more than 50 employees
- **Renew “as-is” plan information**, which includes renewal forms and documents for their existing plan, per the usual process. Employers will not receive alternative plan information; this will be sent directly to the group agent of record.

New: Alternative Plan Information—Agents

Also starting with March 1, 2017 renewals, agents will receive alternative plan information for each plan in which groups have employees enrolled in their Agent Renewal Package. This will help facilitate the conversation with the employer about their options, as outlined in their renewal letter.

—See Next Page—

Questions?

For more information about the expiration of Transitional Relief / Keep Your Plan, and how to help your Small Group employer select a plan that's right for them, please see the [Small Group Agent Toolkit](#), which includes:

- [KYP Poster](#)
- [Florida Blue KYP Crosswalks](#)
- [FHCP KYP Crosswalks](#)
- [Overall KYP FAQs](#)

Currently included with this bulletin, but will be uploaded to the Small Group toolkit in 1-2 days.

Contact your Florida Blue Sales Representative, General Agent or Area Manager, or call 800-267-3156 to speak with a representative in the Agent Service Center with any other questions you may have.

<Date>

Your health plan(s) is changing!

Please respond at least 15 days prior to

your Anniversary Date: <AD>

Group Number: <GN>

<Group Name>
<Group Address>
<Group Address>

Dear Valued Customer,

As a result of the Affordable Care Act (ACA), your health plan(s) options will be changing. Your non-grandfathered pre-ACA plan(s) will no longer be available on January 1, 2018. You will have the following options to consider at your renewal:

	Option 1	Option 2
	Keep your plan(s) for a short plan year. You may need to hold a second open enrollment.	Change your plan(s) now.
What will you experience with this option?	You get to keep you plan for the remainder of 2017.	On your renewal date, you can choose to switch to a plan(s) that includes ACA benefits.
How will your contract year be affected?	Your contract will end on December 31, 2017. Prior to this date, you'll be able to select an ACA plan(s).	Your contract and rates are guaranteed for 12 months.
How will your anniversary date be affected?	Your anniversary date for renewals will change to January 1.	Your anniversary date for renewals stays the same. There will be no need to change.
How will your employees be affected?	Your employees may need to select their benefits twice through two open enrollment periods: <ul style="list-style-type: none"> Open enrollment 1: Your employees will select coverage from your current health plan(s) that starts with your anniversary date and ends on December 31, 2017. Open enrollment 2: Your employees will select an ACA plan(s) that starts on January 1, 2018 with a new anniversary date of January 1. 	Your employees will only have to enroll once this year based on your normal renewal cycle.

Enclosed is renewal information for your existing plan(s). Please review the details inside and contact your agent if you have any questions or need help completing these forms.

What happens next:

1. Distribute the enclosed current Summary of Benefits and Coverage (SBC) to your employees with open enrollment materials at least 30 days prior to your renewal date. Please be sure that you review your SBC carefully—sometimes benefit changes occur without the plan number(s) changing.
2. Complete and return the Enrollment Summary **at least 15 days prior to your anniversary date.**
3. Please return the following forms, if they are enclosed:
 - Compliance Review Audit Addendum: This is tax documentation that we need to validate that your business complies with small group laws and regulations.
4. Please visit BlueBiz to renew your premium **auto-draft payment** through View and Pay Invoice (VPI) since this feature will expire with your current plan year.

Thank you for continuing to trust us with your health care coverage.

Your Partner in Health,
Florida Blue

Contact Information:

<Agent or BCBSF Representative>
<Name>
<Address>
<City, State Zip>
<Phone: Fax: Email address:>

Important Note: This renewal is contingent on your business complying with all small group underwriting criteria as governed by **627.6699, Florida Statutes** and other pertinent small group laws and regulations. Any material misrepresentation or fraud may result in the termination of your group health care coverage, for you, your enrolled dependents and/or your employees. If it is determined that your business no longer meets the requirements for eligibility, or if you fail to comply with any additional terms of the contract, your group health care coverage may not be renewed. Florida Blue reserves the right to adjust the rates and/or fees in the event of any changes in federal, state or other applicable legislation or regulation or any changes to the number of employees.

Health insurance is offered by Florida Blue. HMO coverage is offered by Florida Blue HMO, an affiliate of Florida Blue. These companies are Independent Licensees of the Blue Cross and Blue Shield Association.

Florida Blue and Florida Blue HMO do not discriminate on the basis of race, color, national origin, disability, age, sex, gender identity, sexual orientation, or health status in the administration of the plan(s), including enrollment and benefit determinations.

<Date>

Your health plan(s) is changing!

Please respond at least 15 days prior to

your Anniversary Date: <AD>

Group Number: <GN>

<Group Name>
<Group Address>
<Group Address>

Dear Valued Customer,

As a result of the Affordable Care Act (ACA), your health plan options will be changing. Your non-grandfathered pre-ACA plan(s) will no longer be available on January 1, 2018. You will have three options to consider at your renewal:

	Option 1	Option 2	Option 3
	Keep your plan(s) for a short plan year. You may need to hold a second open enrollment	Keep your grandfathered plan(s) only	Change your plan(s) now
What will you experience with this option?	You'll get to keep your plan for the remainder of 2017.	On your renewal date, you can choose to keep only your grandfathered plan(s). This would mean that all of your employees would move into your grandfathered plan(s).	On your renewal date, you can choose to switch to a plan(s) that includes ACA benefits.
How will your contract year be affected?	Your contract will end on December 31, 2017. Prior to this date, you'll be able to select an ACA plan(s).	Your contract and rates are guaranteed for 12 months.	Your contract and rates are guaranteed for 12 months.
How will your anniversary date be affected?	Your anniversary date for renewals will change to January 1.	Your anniversary date for renewals stays the same. There will be no need to change.	Your anniversary date for renewals stays the same. There will be no need to change.
How will your employees be affected?	Your employees may need to select their benefits twice through two open enrollment periods: <ul style="list-style-type: none"> Open enrollment 1: Your employees will select coverage from your current health plan(s) that starts with your anniversary date and ends on December 31, 2017. Open enrollment 2: Your employees will select an ACA plan(s) that starts on January 1, 2018 with a new anniversary date of January 1. 	Your employees will only have to enroll once this year based on your normal renewal cycle. Employees who move into a Grandfathered plan will have new benefits and rates.	Your employees will only have to enroll once this year based on your normal renewal cycle.

Enclosed is renewal information for your existing plan(s). Please review the details inside and contact your agent if you have any questions or need help completing these forms.

What happens next:

Distribute the enclosed current Summary of Benefits and Coverage (SBC) to your employees with open enrollment materials at least 30 days prior to your renewal date. Please be sure that you review your SBC carefully—sometimes benefit changes occur without the plan number(s) changing.

1. Complete and return the Enrollment Summary **at least 15 days prior to your anniversary date**.
2. Please return the following forms, if they are enclosed:
 - Grandfather Plan(s) Certification Form: This form is required by the Affordable Care Act (ACA) for your health plan(s) to remain in the “Grandfather” status. “Grandfather” status means that you have a health plan(s) that has not changed since March 23, 2010. This plan(s) may not include all of the benefits required by the ACA. If you do not return the form, we will consider this as an admission that the plan(s) is not grandfathered and an approval to change your grandfather status.
 - Compliance Review Audit Addendum: This is tax documentation that we need to validate that your business complies with small group laws and regulations.
3. Please visit BlueBiz to renew your premium **auto-draft payment** through View and Pay Invoice (VPI) since that feature will expire with your current plan year.

Thank you for continuing to trust us with your health care coverage.

Your Partner in Health,
Florida Blue

Contact Information:

<Agent or BCBSF Representative>
<Name>
<Address>
<City, State Zip>
<Phone: Fax: Email address:>

Important Note: This renewal is contingent on your business complying with all small group underwriting criteria as governed by **627.6699, Florida Statutes** and other pertinent small group laws and regulations. Any material misrepresentation or fraud may result in the termination of your group health care coverage, for you, your enrolled dependents and/or your employees. If it is determined that your business no longer meets the requirements for eligibility, or if you fail to comply with any additional terms of the contract, your group health care coverage may not be renewed. Florida Blue reserves the right to adjust the rates and/or fees in the event of any changes in federal, state or other applicable legislation or regulation or any changes to the number of employees.

Health insurance is offered by Florida Blue. HMO coverage is offered by Florida Blue HMO, an affiliate of Florida Blue. These companies are Independent Licensees of the Blue Cross and Blue Shield Association.

Florida Blue and Florida Blue HMO do not discriminate on the basis of race, color, national origin, disability, age, sex, gender identity, sexual orientation, or health status in the administration of the plan(s), including enrollment and benefit determinations.

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<Date>

Your health plan(s) is changing!

**Please respond at least 15 days prior to
your Renewal Date**

<Group Name>
<Group Address>
<Group Address>

Group Number: <GN>

Dear Valued Customer,

As a result of the Affordable Care Act (ACA), your health plan(s) options are changing. Your non-grandfathered pre-ACA plan(s) will not be available on January 1, 2018 because you qualify as a small group employer (i.e., your total average employee count is 50 or less). You'll have the following options to consider at your renewal:

If your total average number of employees is 51 or more, you can keep your plan(s) as-is.

If your total average number of employees on payroll is 51 or more, then you can renew back into your current health plan(s).

If your total average number of employees is 50 or less, then you'll have the following options:

	Option 1	Option 2
	Keep your plan(s) for a short plan year. You may need to hold a second enrollment	Change your plan(s) now
What will you experience with this option?	You'll get to keep your plan for the remainder of 2017.	On your renewal date, you can choose to switch to a plan(s) that includes ACA benefits.
How will your contract year be affected?	Your contract will end on December 31, 2017. Prior to this date, you'll be able to select an ACA plan(s).	Your contract and rates are guaranteed for 12 months.
How will your anniversary date be affected?	Your anniversary date for renewals will change to January 1.	Your anniversary date for renewals stays the same. There will be no need to change.
How will your employees be affected?	Your employees may need to select their benefits twice through two open enrollment periods: <ul style="list-style-type: none"> Open enrollment 1: Your employees will select coverage from your current health plan(s) that starts with your anniversary date and ends on December 31, 2017. Open enrollment 2: Your employees will select an ACA plan(s) that starts on January 1, 2018 with a new anniversary date of January 1. 	Your employees will only have to enroll once this year based on your normal renewal cycle.

Enclosed is renewal information for your existing plan(s). Please review the details inside and contact your agent if you have any questions or need help completing these forms.

What happens next:

1. Distribute the enclosed current Summary of Benefits and Coverage (SBC) to your employees with open enrollment materials at least 30 days prior to your renewal date. Please be sure that you review your SBC carefully—sometimes benefit changes occur without the plan number(s) changing.
2. Complete and return the Enrollment Summary **at least 15 days prior to your anniversary date.**
3. Please return the following forms, if they are enclosed:
 - Compliance Review Audit Addendum: Tax documentation required to validate that your business complies with small group laws and regulations.
4. Please visit BlueBiz to renew your premium **auto-draft payment** through View and Pay Invoice (VPI) since that feature will expire with your current plan year.

Thank you for continuing to trust us with your health care coverage.

Your Partner in Health,
Florida Blue

Contact Information:

<Agent or BCBSF Representative>
<Name>
<Address>
<City, State Zip>
<Phone: Fax: Email address:>

Important Note: This renewal is contingent on your business complying with all small group underwriting criteria as governed by **627.6699, Florida Statutes** and other pertinent small group laws and regulations. Any material misrepresentation or fraud may result in the termination of your group health care coverage, for you, your enrolled dependents and/or your employees. If it is determined that your business no longer meets the requirements for eligibility, or if you fail to comply with any additional terms of the contract, your group health care coverage may not be renewed. Florida Blue reserves the right to adjust the rates and/or fees in the event of any changes in federal, state or other applicable legislation or regulation or any changes to the number of employees.

Health insurance is offered by Florida Blue. HMO coverage is offered by Florida Blue HMO, an affiliate of Florida Blue. These companies are Independent Licensees of the Blue Cross and Blue Shield Association.

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**“Grandmothered”/Transitional Relief/Keep Your Plan Expiration
Frequently Asked Questions
Approved for Use with Florida Blue Agents**

December 9 Updates in RED

Overview

When the Affordable Care Act (ACA) was enacted, it allowed groups with coverage prior to March 23, 2010 to keep their plan and remain “Grandfathered”. In 2013, CMS recognized that some groups would lose coverage if purchased after the passing of the ACA. In November 2013, CMS issued guidance on “transitional relief” giving states the option to allow small groups to keep their plan(s) for one year. In March 2014, CMS issued a notice extending transitional relief (also known as Keep Your Plan or KYP) for two additional years. In February 2016, CMS issued a notice advising that transitional relief (KYP) would be extended for one more year. All transitional relief (KYP) groups – or “grandmothered” must move into a plan with ACA essential health benefits by January 1, 2018.

In response to the ruling made by CMS, Florida Blue has maintained the stance that we want to provide employers with as many options as possible to meet their needs and the needs of their employees. As a result, we have allowed our Small Group employers to remain in their grandmothered health plans. In our continued effort to provide employers with options, we will continue to allow employers to renew into their existing grandmothered plan through October 1, 2017 as long as these employers have moved into an ACA plan by January 1, 2018.

Below are some FAQs related to the expiration of Grandmothered/Transitional Relief/Keep Your Plan.

FAQs

- 1. How will Florida Blue respond to the expiration of “Keep Your Plan” transitional relief health plans?**
 - For employers renewing between January 1, 2017 through October 1, 2017, Florida Blue will allow employers to renew back into their current health plan(s) until December 31, 2017. After that, their plan will end and they will need to switch to a plan(s) that includes benefits that are required by the ACA.
 - Coverage would start on their renewal / anniversary date and continue through December 31, 2017.
 - Depending on their anniversary date, their plan’s contract year may be less than 12 months and would extend from their renewal date through December 31, 2017.
 - On January 1, 2018, all employers in grandmothered plans would be required to migrate to an ACA plan.
 - This would change their anniversary date to January 1.

- 2. What are the options for an employer who has only a grandmothered plan with an anniversary date from January 15, 2017 and October 1, 2017?**
 - Currently, employers who are in a grandmothered have two options at their 2017 renewal:
 - Option 1: Keep their plan as-is for a short plan year and potentially hold a second open enrollment
 - Option 2: Change to an ACA plan now
 - For more details about how this option will play out, please see the details in the chart:

	Option 1	Option 2
	Keep your plan(s) for a short plan year. You may need to hold a second open enrollment.	Change your plan(s) now.
What will you experience with this option?	You get to keep you plan for the remainder of 2017.	On your renewal date, you can choose to switch to a plan(s) that includes ACA benefits.
How will your contract year be affected?	Your contract will end on December 31, 2017. Prior to this date, you'll be able to select an ACA plan(s).	Your contract and rates are guaranteed for 12 months.
How will your anniversary date be affected?	Your anniversary date for renewals will change to January 1.	Your anniversary date for renewals stays the same. There will be no need to change.
How will your employees be affected?	<p>Your employees may need to select their benefits twice through two open enrollment periods:</p> <ul style="list-style-type: none"> • Open enrollment 1: Your employees will select coverage from your current health plan(s) that starts with your anniversary date and ends on December 31, 2017. • Open enrollment 2: Your employees will select an ACA plan(s) that starts on January 1, 2018 with a new anniversary date of January 1. 	Your employees will only have to enroll once this year based on your normal renewal cycle.

3. What is the last date that an employer will be allowed to renew into their grandfathered plan?

- Per Federal guidelines, the last date employers can renew into their grandfathered plan is October 1, 2017.
- For employers renewing after October 1, 2017, Small Group employers will not have the option to renew into their pre-ACA plans.
- For employers renewing after October 1, 2017, CMS will require that all Small Group employers migrate into an ACA plan or move all of their employees into a grandfathered plan, if they have one.

4. Will Florida Blue allow “short” contract years?

- Employers that are renewing in between January 1, 2017 and October 1, 2017 will be able to renew into their existing grandfathered plan.
- Depending on their anniversary date, an employer’s contract year may be less than 12 months and would extend from their anniversary date through December 31, 2017.
- On January 1, 2018, all employers in grandfathered plans will be required to migrate to an ACA plan or move all of their employees into a grandfathered plan, if they have one.
- If the employer migrates to an ACA plan, this would change their anniversary date to January 1.

5. Will Florida Blue allow “long” contract years?

- Florida Blue allowed an extended or “long” contract for groups with effective dates in October, November and December 2016. Employers that selected the extended contract were provided rates in 2016 for the length of the extended contract. If the employer chose to renew as-is with an extended contract, the employer would have needed to sign an extended contract period amendment.
- This option was available for both Florida Blue and Florida Health Care Plans. However, this option was NOT AVAILABLE for Capital Health Plans (CHP).

6. Will rates change for Small Group employers when they migrate to an ACA plan?

- Rates vary significantly across benefit plans and based on employer demographics.
- The coverage included in many pre-ACA health plans varies drastically from what an ACA plan will include.
- The ACA requires that Small Group ACA plans include specific medical and pharmacy coverage that many pre-ACA plans do not contain.
- The ACA required benefits that must be added to plans can add some cost when compared to many of our grandmothers plans.

7. Will a Small Group employer that has a 2017 anniversary date after January 1, 2017 be able to choose to renew into their grandmothers plan?

- Employers that have a renewal date between January 15, 2017 and October 1, 2017 will be allowed to renew into their existing grandmothers plan.
- For employers with an anniversary date after January 1, 2017 choosing to renew into their grandmothers plan, their contract year will be less than 12 months and would extend from their renewal date through December 31, 2017.
- On January 1, 2018, all employers in grandmothers plans would be required to migrate to an ACA plan or move all of their employees into a grandfathered plan, if they have one.
- If the employer migrates to an ACA plan, this would change their anniversary date to January 1.

8. What is an example of a Small Group employer that renews into their pre-ACA plan for a short contract year?

- For example, if an employer has a renewal date of March 1, 2017 and they renew into their grandmothers plan, their contract year will run from March 1 – December 31, 2017.
- At the end of 2017, they will need to migrate to an ACA plan with an effective date of January 1, 2018.
- From that date forward, their new anniversary date will be January 1 of each year.

9. How does a Small Group employer manage open enrollment for their employees if they renew into their existing pre-ACA plan for a short contract year?

Depending on the employer, they may need to hold a second open enrollment if they have a short contract year. Using the example above of a March 1, 2017 renewal date, employers may need to have two open enrollment periods. It would look something like this:

- Employees would select their benefits twice through two enrollment periods:
 - Enrollment 1: Select coverage that starts with the employer’s anniversary date and ends on December 31, 2017 and
 - Enrollment 2: Select an ACA plan that starts on January 1, 2018 with a new anniversary date of January 1.

10. What if a Small Group employer has both non-ACA Grandfathered plans and grandmothereed plans?

- Grandfathering is not impacted by the expiration of the Keep Your Plan transitional relief. However, starting January 1, 2018, CMS small group rating rules effectively prevent employers from having both Grandfathered and ACA plans.
- During 2017, if an employer has both non-ACA Grandfathered plans and grandmothereed plans, they will have two options:
 - Option 1: Keep both their grandfathered and grandmothereed plans through December 31, 2017. At that point they will need migrate to an ACA plan or move all of their employees to their grandfathered plan(s).
 - Option 2: Move all of their employees to their grandfathered plan(s), or
 - Option 3: Move all of their employees to ACA plan(s).
- **A group can elect to renew as-is on their current anniversary date. Prior to January 1, 2018, Florida Blue will send groups in this situation a reminder that their GM plans will be expiring as of December 31, 2017. At that time, the group can elect to move all employees to their GF plan and keep their current anniversary date. If the group chooses to move everyone to an ACA plan, then the group will be renewed as of January 1, 2018 and will now have a January anniversary.**
- For more details about how this option will play out, please see the details in the below chart:

	Option 1	Option 2	Option 3
	Keep your plan(s) for a short plan year. You may need to hold a second open enrollment	Keep your grandfathered plan(s) only	Change your plan(s) now
What will you experience with this option?	You'll get to keep your plan for the remainder of 2017.	On your renewal date, you can choose to keep only your grandfathered plan(s). This would mean that all of your employees would move into your grandfathered plan(s).	On your renewal date, you can choose to switch to a plan(s) that includes ACA benefits.
How will your contract year be affected?	Your contract will end on December 31, 2017. Prior to this date, you'll be able to select an ACA plan(s).	Your contract and rates are guaranteed for 12 months.	Your contract and rates are guaranteed for 12 months.
How will your anniversary date be affected?	Your anniversary date for renewals will change to January 1.	Your anniversary date for renewals stays the same. There will be no need to change.	Your anniversary date for renewals stays the same. There will be no need to change.
How will your employees be affected?	Your employees may need to select their benefits twice through two open enrollment periods: <ul style="list-style-type: none"> · Open enrollment 1: Your employees will select coverage from your current health plan(s) that starts with your anniversary date and ends on December 31, 2017. · Open enrollment 2: Your employees will select an ACA plan(s) that starts on January 1, 2018 with a new anniversary date of January 1. 	Your employees will only have to enroll once this year based on your normal renewal cycle.	Your employees will only have to enroll once this year based on your normal renewal cycle.

11. Will groups auto renew to an equivalent ACA plan or be canceled if they are non-responsive to their January 1, 2018 renewal?

We are still working this out, but we believe we will allow groups to auto renew into the closest benefit match. At this point, we don't think we will cancel a group. We will continue to communicate further about this as we work out additional details.

12. Why would Small Group employers delay migrating to ACA plans and want to renew into their existing grandfathered plans?

- Small Group employers may want to delay migrating to ACA plans for many reasons, including rate changes, plan design and their own preference.
- Since rates vary significantly across benefit plans and based on employer demographics, migrating to an ACA plan can mean rate changes.
- The coverage included in many pre-ACA health plans may vary drastically from what an ACA plan will include.
- The ACA requires that Small Group ACA plans include specific medical and pharmacy coverage that many pre-ACA plans do not contain.
- The ACA required benefits that must be added to plans can also add some cost when compared to many of our grandfathered plans.

13. How are we communicating this change to our SG employers that are in grandfathered plans?

Beginning with March 1, 2017 renewals, we are including information in employer renewal packages. In their renewal letter (which is mailed out 60 days prior to their renewal date), we are explaining that they have some options to consider at their renewal time.

14. How is Florida Blue supporting our Small Group employers during this transition?

In addition to providing this information to employers in their renewal packages, we are also providing agents with information on alternative plans including plans with similar benefits and plans with similar monthly premiums to the employer's existing grandfathered plan. This information on these alternative plans will be provided to agents in advance of the renewal package being sent to employers. Agents can use these alternative plans to help employers make the best plan selection for their business.

15. Will we provide a crosswalk to agents for the equivalent ACA plans in 2017?

All pre-ACA plans have been mapped to their closest benefit match ACA plan. There are approximately 15 pre-ACA plans that will see fairly large increases going from pre-ACA to ACA. For these plans, we are developing job aids to show recommended step down options. We will provide the full set to agents.

16. Will this change impact Large Groups that are in Small Group grandfathered plans?

Large groups enrolled in SG Pre-ACA plans will be able to keep their plan as long as they maintain 51+ members. If the group's average number of employees drops to 50 or less on any anniversary date after the group's 2017 anniversary, they will be required to select a plan from the SG ACA portfolio and migrate all members to that plan.

17. How will groups that will be in short contract year grandfathered plans (ending December 31, 2017) be notified of the requirement that they migrate all employees into an ACA plan by January 1, 2017?

Florida Blue will be sending a notification to all groups with grandfathered plans reminding them of the KYP expiration as of December 31, 2017. Florida Blue also encourages agents to have discussions with their groups that currently have grandfathered plans concerning their options to either keep their grandfathered plan until the expiration date of December 31, 2017 and then migrate to an ACA plan, or to go ahead and

move to an ACA plan at renewal. Groups with both grandfathered and grandmothered plans have additional options:

- Renew as-is in 2017 if anniversary is 10/1 or earlier (group keeps grandfathered status)
 - For January 1, 2018, group can decide to move all employees to grandfathered plan and keep grandfathered status and anniversary
 - For January 1, 2018, group can decide to migrate all employees to ACA, lose grandfathered status, and have a 1/1 anniversary date
- Migrate all employees to GF plan at renewal and drop grandmothered plans (group keeps grandfathered status)
- Migrate all employees to grandmothered plan at renewal and drop grandfathered plans (group loses grandfathered status and must select a plan from the 2018 ACA Portfolio prior to January 1, 2018)
- Migrate all grandfathered/grandmothered employees to an ACA plan at renewal (group loses grandfathered status but maintain their current anniversary date).