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Department of Insurance
State of Idaho

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**BEFORE THE DIRECTOR OF THE IDAHO DEPARTMENT OF INSURANCE
STATE OF IDAHO**

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

**UNITEDHEALTHCARE OF THE
ROCKIES, INC.**, a Utah Company; Idaho
Certificate of Authority No. 4558 and **CARE
IMPROVEMENT PLUS SOUTH
CENTRAL INSURANCE COMPANY**, a
Nebraska Company; Idaho Certificate of
Authority No. 4411,

Respondents.

Docket No. 18-4775-25

**STIPULATION AND CONSENT
ORDER**

COME NOW the staff of the Idaho Department of Insurance (“Department”), UNITEDHEALTHCARE OF THE ROCKIES, INC. and CARE IMPROVEMENT PLUS SOUTH CENTRAL INSURANCE COMPANY (collectively, “Respondents”) and do hereby agree and stipulate as follows:

BACKGROUND

1. UnitedHealthCare of the Rockies, Inc. is duly authorized by the state of Idaho as a Utah-domiciled managed care organization, under Idaho Certificate of Authority No. 4558 which was originally issued on March 23, 2021. CARE IMPROVEMENT PLUS SOUTH CENTRAL INSURANCE COMPANY is a Nebraska-domiciled company operating under Idaho Certificate of Authority No. 4411, which was originally issued on November 16, 2017. In general, Respondents are subject to the provisions of title 41, Idaho Code, and to the rules of the Idaho Department of Insurance promulgated thereunder.

2. The Director of the Department (“Director”) generally has jurisdiction over Respondents pursuant to the provisions of the Idaho Insurance Code, Idaho Code §§ 41-101 *et seq.*, subject to the parties’ positions below.

3. On October 21, 2025, the Department sent Respondents a written inquiry requesting certain information by November 4, 2025.

4. On December 1, 2025, the Department filed a Verified Complaint and Notice of Right to Hearing (hereinafter “Verified Complaint”), seeking the imposition of administrative penalties against Respondents. Among the allegations in the Verified Complaint were that Respondents violated Idaho Code § 41-247 by failing to comply with the Department’s October 21 written inquiry.

5. Idaho Code § 41-247 provides: “The Director shall have the power to direct an inquiry in writing to any person subject to his jurisdiction with respect to any insurance transaction or matter relative to a subject of insurance resident, located, or to be performed in this state. The person to whom such an inquiry is addressed shall upon receipt thereof promptly furnish to the Director all requested information which is in his possession or subject to his control.”

6. Respondents have filed a lawsuit styled as *UnitedHealthcare of the Rockies, Inc. v.*

Cameron, No. 1:25-CV-665 (D. Idaho) (the “Lawsuit”) challenging the constitutionality of the Department’s actions, including in relevant part its conduct in connection with the inquiry letter and Verified Complaint. The Lawsuit remains pending in the United States District Court for the District of Idaho

7. Respondents assert that the information sought by the Department’s October 21 written inquiry and Verified Complaint falls outside the Department’s lawful authority because the inquiry is preempted by federal law. Respondents therefore assert that the Department lacks authority under Title 41 of the Idaho Code (including but not limited to under § 41-247) to pursue the issues raised in the inquiry letter and the Verified Complaint.

8. The Department maintains that Respondents’ position regarding preemption is without merit and does not abrogate Respondents’ statutory duty to respond to an inquiry by the Department.

9. Without waiving their legal positions and without making an admission of liability, the parties have agreed to enter into this Stipulation to avoid the delay, uncertainty, inconvenience, and expense of litigation in connection with the inquiry letter and Verified Complaint.

AGREEMENT

10. In full and final settlement of the issues raised in the inquiry letter and Verified Complaint, Respondents and the Department stipulate and agree as follows:

a. Within 14 days of receipt of the fully executed Stipulation and Consent Order, Respondents agree to provide the following information, which Respondents intend to label as trade secrets:

i. The bid pricing tool workbooks for the Idaho Medicare Advantage plans;
and

ii. The relevant portions of the non-benefit expense model with supporting documentation.

b. Respondents also agree to pay five thousand dollars (\$5,000.00), representing the administrative penalty sought in the Verified Complaint, in full and final settlement of the issues raised in the inquiry letter and Verified Complaint.

11. Respondents acknowledge that it has read this Stipulation and understands its contents; that it has been given the opportunity to discuss this Stipulation with independent legal counsel of its choosing; and that it has entered into this Stipulation knowingly, voluntarily, and with full knowledge of any rights they may be waiving thereby.

12. This Stipulation is subject to approval by the Director or the Director's designee and shall become effective and binding upon the Department and Respondents upon such approval. Should the Director decline to approve this Stipulation, the Department and Respondents shall retain all of their rights, claims and/or defenses, and any factual and/or legal admissions made by Respondents herein shall be withdrawn. This Stipulation embodies the entire agreement between the Department and Respondents, and there are no agreements, understandings, representations, or warranties that are not expressly set forth herein.

13. This Stipulation constitutes the full and final resolution of all matters associated with the inquiry letter and the Verified Complaint, and the Department agrees that, subject to the Director's approval described above, the Department shall seek no further civil or administrative sanctions for the violations alleged in the Verified Complaint. The parties agree that their dispute relating to the cease-and-desist order issued by the Department remains live. This Stipulation shall not be construed to limit Respondents' right to seek relief in the Lawsuit or any appeal arising therefrom, except that Respondents agree, upon final execution of this Stipulation, to notify the

court that its pending motion to preliminarily enjoin administrative proceedings arising from the Verified Complaint is moot in that respect only.

14. Respondents agree that, upon execution of this Stipulation, no subsequent action or assertion shall be maintained or pursued in any manner asserting the invalidity of this Stipulation.

Agreed this 5th day of May 2026.

By: Erin Weber
Erin Weber, General Counsel Medicare & Retirement
UnitedHealthcare of the Rockies, Inc.

By: Erin Weber
Erin Weber, General Counsel Medicare and
Retirement
Care Improvement Plus South Central Ins. Co.

Approved as to Form:

By: Wendy Olson
Wendy Olson
Counsel for Respondent


Agreed this 5th day of May 2026.

State of Idaho
Department of Insurance

By: Randall M. Pipal
Randall M. Pipal
Bureau Chief, Consumer Services

Approved as to Form:

State of Idaho
Office of the Attorney General

By:  _____
Matt Steen
Deputy Attorney General
Attorney for the Department of Insurance

CONSENT ORDER

The parties hereto, namely the Idaho Department of Insurance, UnitedHealthCare of the Rockies, Inc., and Care Improvement Plus South Central Insurance Company (collectively, “Respondents”), having entered into the foregoing Stipulation, and the form of the order having been approved, the Director, having reviewed the same, does hereby find that there is a factual basis for entry of a Consent Order herein.

Now, therefore, based on the foregoing and in consideration of the premises,

It is hereby ordered that the foregoing Stipulation is approved and is incorporated herein as if set forth in full and made a part hereof;

It is further ordered that Respondents pay the Department five thousand dollars (\$5,000.00), representing the administrative penalty sought in the Verified Complaint.

Dated this 6 day of May 2026.

State of Idaho
Department of Insurance

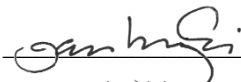


Dean L. Cameron
Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of May 2026, I caused a true and correct copy of the foregoing STIPULATION AND CONSENT ORDER to be served upon the following parties by the method(s) indicated below:

Wendy Olson Stoel Rives, LLP 101 S Capital Blvd Ste 1900 Boise, ID 83702	<input type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Email: wendy.olson@stoel.com
Susan Cook Hogan Lovells US LLP 555 Thirteenth St NW Washington, DC 20004	<input type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Email: susan.cook@hoganlovells.com



Jan Noriyuki, Paralegal