

State of Idaho
DEPARTMENT OF INSURANCE

BRAD LITTLE
Governor

700 West State Street, 3rd Floor
P.O. Box 83720
Boise, Idaho 83720-0043
Phone 208-334-4250
Fax 208-334-4398
Website: <https://doi.idaho.gov>

DEAN L. CAMERON
Director

BULLETIN NO. 25-04

DATE: May 22, 2025
TO: Disability/Health Insurance Carriers in the Individual and Group Market
FROM: Dean L. Cameron, Director
SUBJECT: Guidance Concerning Outlines of Coverage and Summaries of Benefits and Coverage

This Bulletin provides guidance to carriers issuing health benefit plans subject to Idaho Code Title 41, Chapter 42, concerning the Outline of Coverage (OOC) requirement found in Idaho Code § 41-4205. Specifically, this Bulletin permits carriers to provide the Summary of Benefits and Coverage (SBC), introduced under the Affordable Care Act (ACA), to satisfy Idaho's statutory requirement to provide an OOC.

Idaho Code § 41-4205(1) requires that, for full and fair disclosure, no policy of disability insurance subject to Chapters 42 may be issued or renewed unless an OOC is provided to the insured. Idaho Code § 41-4205(2) allows the Director to prescribe the format and content of the OOC, which must include the elements described in § 41-4205(2)(a) through (e).

The ACA requires health plans to provide applicants, enrollees, and policyholders with accurate descriptions of the benefits and coverage available under the plans. 42 U.S.C. § 300gg-15. This statutory requirement is implemented by 45 C.F.R. § 147.200, which requires issuers of group and individual health insurance coverage to provide prospective and current enrollees with a standardized SBC. The format and content requirements for the SBC have been established and refined through guidance issued by the U.S. Departments of Labor, Health and Human Services, and the Treasury.

Pursuant to the Director's authority under Idaho Code § 41-4205(2) to prescribe the format and content of the OOC, the Department finds that SBCs provide information substantially similar to that required for an OOC under state law.

Therefore, effective immediately, carriers of health benefit plans may satisfy the OOC requirement under Idaho Code § 41-4205(1) by providing insureds and prospective insureds with an SBC that fully complies with 45 C.F.R. § 147.200 and subsequent related guidance.

This Bulletin is not new law but is an agency interpretation of existing law, except as authorized by law or as incorporated into a contract. Requests for additional information or other inquiries regarding this Bulletin can be directed to Market Oversight Bureau Chief Shannon Hohl at 208-334-4315 or shannon.hohl@doi.idaho.gov.