

State of Idaho
DEPARTMENT OF INSURANCE

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DEAN L. CAMERON
Director

BULLETIN NO. 21-01

DATE: February 12, 2021
TO: Idaho Health Insurance Exchange and all Idaho carriers issuing individual market Health Benefit Plans
FROM: Dean L. Cameron, Director
SUBJECT: Special Enrollment Period for Health Benefit Plans Due to COVID-19

This Bulletin applies to Idaho Health Insurance Exchange, doing business as Your Health Idaho, Inc. (“YHI”), and insurance carriers offering Health Benefit Plans, both on and off Idaho’s exchange.

Considering the exceptional circumstances caused by the ongoing COVID-19 pandemic, on January 28, 2021, President Biden issued an Executive Order ordering the Secretary of Health and Human Services to consider opening a special enrollment period for uninsured and under-insured Americans to seek coverage through the Federally-facilitated Marketplace. The Secretary has ordered a special enrollment period. States with state-based marketplaces can, but are not required, to allow for a similar special enrollment period. Officials from all other states have announced that they will do so.

The Department acknowledges that Special Enrollment Periods already exist under the ACA for qualifying events such as a loss of coverage, loss of income, change in family status, etc. Further, the Department affirms that YHI just completed an extended traditional open enrollment period on December 31st, two weeks beyond federally-facilitated exchanges. The Department understands APTC verifications are being completed from that open enrollment extension. The Department finds it in the best interest of political subdivisions, healthcare providers, and the citizens of the State of Idaho to maximize access to affordable and appropriate health care by allowing Idahoans to seek healthcare coverage in a responsible manner that seeks to minimize premium rate increases for Idahoans.

The Department acknowledges that YHI will take necessary actions to open an exceptional special enrollment period (the “SEP”) for Idahoans to obtain healthcare coverage. Accordingly, the Department requests that carriers enroll Idahoans who qualify for coverage during the SEP. Further, the Department requests carriers to similarly offer enrollment in off-exchange individual market Health Benefit Plans to all eligible Idahoans in a non-discriminatory manner during the SEP and that the carriers track applications and effectuations by rating area and metal level specific to this SEP, submitting reports with such information to the Department weekly, by email to companies@doi.idaho.gov. Lastly, the Department requests that YHI track costs

incurred by YHI in offering the SEP, as well as advanced premium tax credit determinations and per carrier enrollments specific to this SEP, and report those costs to the YHI board and to the DOI.

The SEP shall:

- Commence March 1, 2021. However, Advance Payment of Premium Tax Credit determinations through Department of Health and Welfare may begin sooner.
- Conclude on March 31, 2021, unless extended by the Department after conducting a cost-benefit analysis and after consultation with YHI, DHW and other impacted parties.
- Not allow currently enrolled individuals to change carriers or metal levels unless there is a new qualifying life event.
- All plan selections made by March 31 will have an April 1, 2021 effective start date.

This Bulletin will remain in effect until termination of this exceptional SEP.

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 Deputy Director Wes Trexler at 208-334-4214 or weston.trexler@doi.idaho.gov. YHI questions should be directed to Frances Nagashima at frances.nagashima@yourhealthidaho.org.