

*State of Idaho*  
**DEPARTMENT OF INSURANCE**

C.L. "BUTCH" OTTER  
Governor

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DEAN L. CAMERON  
Director

April 1, 2022

**Via Email**

Dear Tribal Representative:

The Idaho Department of Insurance gives notice of intent to apply to the Centers for Medicare and Medicaid Services (CMS) and to the United States Department of the Treasury for a Section 1332 State Innovation waiver on or about May 2022. The purpose of the waiver is to implement a state reinsurance program to increase affordability of individual health insurance in Idaho. The proposed effective date for the waiver is January 1, 2023.

Department staff shared initial information about the proposed waiver application and process with Tribal Representatives during the February 23, 2022 Idaho Tribes/Idaho Medicaid Quarterly Meeting. This letter is intended to provide further information and invite you to provide comment on the application.

The proposed 1332 waiver does not affect the provision of tribal health care services or the benefits of any health insurance policies that tribal members may be enrolled in. There is no impact to Indian Health Services, the Federal Health Program for American Indians, and Alaska Natives. The proposed 1332 waiver, if approved by CMS, will reduce health insurance premiums for any Native Americans who buy on Idaho's individual market. The waiver is also expected to help reduce uncompensated care costs for providers by helping more people afford insurance coverage.

The waiver would be implemented primarily by the Idaho Individual High Risk Reinsurance Pool ("the Pool"), a state reinsurance program in which enrollees in individual coverage who are diagnosed with certain specified medical conditions are ceded to the Pool by the health insurer. The health insurer then pays a monthly premium to the Pool for that reinsurance.

Due to implementation of the program, health insurers are able to mitigate the effects of extremely high health claims on the individual risk pool, helping to stabilize the individual health insurance market and resulting in lower premiums than would otherwise occur.

The state is submitting this section 1332 waiver in order to further increase affordability of individual health insurance in Idaho. The Pool has successfully reduced premiums in the past, and Idaho anticipates that approval of this 1332 waiver will reduce premiums by at least 7% in 2023 and onward, compared to premiums without the waiver in place.

As part of the waiver process, the Department submitted legislation to authorize the Department to submit the waiver application to the federal agencies and to condition future premium reductions

from the state reinsurance program upon approval of the 1332 waiver. Governor Little signed H611 on March 23, 2022.

The Department's comprehensive public notice, Tribal notice and the waiver application are available on our website at <https://doi.idaho.gov/information/public/reinsurance-waiver/>. The Department is seeking public comment through public hearings, the interactive form available on the website, via fax, via email or traditional mail as indicated below. Public hearings will be held at the following locations:

<b><u>Boise Public Hearing (also virtual)</u></b>	<b><u>Idaho Falls Public Hearing</u></b>	<b><u>Coeur d'Alene Public Hearing</u></b>
<b>Location:</b> Idaho Department of Insurance 700 W. State St. JRW East Conference Room Boise, ID 83702	<b>Location:</b> Idaho Department of Labor 1515 E. Lincoln Rd. Yellowstone Room Idaho Falls, ID 83401	<b>Location:</b> Coeur d'Alene Public Library 702 E. Front Ave. Community Room Coeur d'Alene, ID 83814
<b>Date:</b> April 18, 2022	<b>Date:</b> April 20, 2022	<b>Date:</b> April 26, 2022
<b>Time:</b> 10:00AM – 12:00PM MT	<b>Time:</b> 2:30PM – 4:30PM MT	<b>Time:</b> 10:30AM – 12:30PM PT

**Webex Information:** (Boise Date Only)

**Link:** <https://idahogov.webex.com/idahogov/j.php?MTID=m1ca043b7088fac88c9be403e5254b9ba>

**Meeting Number (access code):** 2456 145 7410

**Password:** WWiPiPNb685

**Call In Number:** 1-415-655-0001

We would be happy to respond to any question you may have about this proposed waiver application. If you would like to arrange a virtual meeting to discuss the proposal, please contact Shannon Hohl, Market Oversight Bureau Chief via email [Shannon.Hohl@doi.idaho.gov](mailto:Shannon.Hohl@doi.idaho.gov), or via phone 208-334-4315. We would appreciate any written comments you may have by May 1, 2022.

Sincerely,



Weston Trexler  
Deputy Director