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

November 14, 2025

Via Email

Dear Tribal Representative:

The Idaho Department of Insurance (the Department) gives public notice of intent to apply for a four-year extension of its Section 1332 State Innovation Waiver, as well as intent to submit an amendment. The Department opens a public comment period on November 14, 2025. The comment period will close on December 22, 2025. All comments can be directed to the addressed contact below.

On October 1, 2025, the Department submitted this intent to the Centers for Medicare and Medicaid Services (CMS) and to the United States Department of the Treasury for an extension and amendment of Idaho's currently approved Section 1332 State Innovation waiver. The purpose of the waiver is to increase the affordability of individual health insurance in Idaho through a reinsurance program, and to expand coverage options for Medicaid-eligible individuals at or above 100% of the federal poverty level (FPL), through a new program referred to as "Covered Choice." This integrated waiver approach will continue to reduce individual market QHP premiums by leveraging federal pass-through funding generated by Idaho's proven reinsurance program while advancing the Affordable Care Act's goals of expanded coverage and consumer choice. The proposed effective date for the waiver is January 1, 2027.

Department staff intend to share initial information about the proposed waiver extension and amendment and process with Tribal Representatives during the November 19, 2025, Idaho Tribes/Idaho Medicaid Quarterly Meeting. This letter is intended to provide further information and invite you to provide comments 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's reinsurance program will continue to be implemented primarily by the Idaho Individual High Risk Reinsurance Pool ("the Pool"). 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. The program mitigates a portion of high-cost medical claims within the individual market, helping to stabilize and reduce the individual market health insurance premiums. The approval of this 1332 waiver extension is projected to reduce premiums by 10% in 2027 and onward, compared to premiums without the waiver in place.

Idaho House Bill 345, enacted in 2025, provides legislative authority and direction for this Section 1332 waiver amendment. The legislation requires that Idaho agencies submit necessary waivers, one of which authorizes establishing a new program to provide commercial coverage options to certain Medicaid-eligible individuals. This legislation allows individuals eligible for Medicaid under section 56-267, Idaho Code, who have a modified adjusted gross income at or above one hundred percent (100%) of the federal poverty level to receive the advance premium tax credit (APTC) to purchase a Qualified Health Plan through the Idaho health insurance exchange, Your Health Idaho. This amendment does not force anyone to purchase a Qualified Health Plan, and instead it only adds a coverage option for those households. Individuals may still choose to enroll in Medicaid.

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:

Boise Hearing

Location: 450 W. State Street, Boise, ID 83702, Conference Room 9A

Date/Time: November 21, 2025 at 1:00PM MT

Virtual Meeting Link: Click here to access the meeting link.

Meeting ID: 219 581 190 520 3

Passcode: BP7ZQ7kY

Coeur d'Alene Hearing

Location: 1120 Ironwood Drive, Coeur d'Alene, ID 83814, Conference Room 1120

Date/Time: December 5, 2025 at 10:00AM MT

Virtual Meeting Link: Click here to access the meeting link.

Meeting ID: 241 718 692 991 5

Passcode: Pw6JJ763

Idaho Falls Hearing

Location: 150 Shoup Avenue, Idaho Falls, ID 83402, Conference Room – 2nd Floor

Date/Time: December 10, 2025 at 12:00PM MT

Virtual Meeting Link: Click here to access the meeting link.

Meeting ID: 257 954 651 173 9

Passcode: dG64f8fd

We would be happy to respond to any questions 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, or via phone 208-334-4315. We would appreciate any written comments you may have by December 22, 2025.

Sincerely,

/s/

Weston Trexler Deputy Director Idaho Department of Insurance