



KIM REYNOLDS
GOVERNOR

DOUG OMMEN
COMMISSIONER OF INSURANCE

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BULLETIN 20-04

To: All Health Insurance Companies Writing in the State of Iowa
From: Doug Ommen, Iowa Insurance Commissioner
RE: Individual and Small Group Coverage Impacted by COVID-19
Date: March 19, 2020

In light of Governor Reynolds's March 17, 2020 proclamation of a State of Public Health Disaster Emergency (the "Proclamation"), the purpose of Bulletin 20-04 is to assist individuals and entities regulated by the Iowa Insurance Division who are impacted by the COVID-19 epidemic and the resulting economic disruptions.

The Commissioner requests all health insurers and health maintenance organizations licensed in this state to allow a premium payment grace period for any Iowa individual health benefit plan as defined in Iowa Code section 513C.3 and to any health benefit plan issued to small employers under Iowa Code chapter 513B as follows:

- Health insurers and health maintenance organizations are requested to put procedures in place allowing individual and small employer policyholders affected by the economic disruptions resulting from COVID-19 to request extensions for premium payments beyond the insurers' normal payment due dates.
- Health insurers and health maintenance organizations are requested to allow any individual or small group policyholder at least 60 days after a premium payment is due before terminating coverage for any such policyholder who has a premium payment initially due between March 17, 2020, and June 30, 2020.
- To the extent that federal law requires a longer or shorter period for payment of premiums, federal law shall control. However, in light of the Proclamation, the Commissioner requests that issuers on the Federally Facilitated Exchange extend premium payment deadlines (such as deadlines for payment to effectuate coverage) and delay cancellations for non-payment of premium that are at least consistent with this Bulletin. The Division further requests that CMS exercise enforcement discretion regarding any provisions of federal law inconsistent with this Bulletin pursuant to section 7.1.4 of the Federally-facilitated Exchanges (FFE) and Federally-facilitated Small Business Health Options Program (FF-SHOP) Enrollment Manual.
- For those policies with an automatic bank draft or electronic funds transfer arrangement, health insurers and health maintenance organizations may continue payment deductions unless or until the policyholder terminates this arrangement with the insurer and financial institution.

The Division is not requesting that health insurers or health maintenance organizations waive any premiums or other consideration owed on any policy or contract. Nothing in this Bulletin should be construed as the Division requesting any health insurer or health maintenance organization to refrain from terminating coverage on the basis of fraud on the part of an insured.