



State Insurance Regulatory COVID-19 Updates

- * In recent weeks, state insurance regulators have been issuing emergency regulations, guidance documents, and press releases to assist regulated entities regarding the provision of insurance-related services during the novel coronavirus (COVID-19) outbreak. The recent updates are denoted below in red, including:
 - Alabama issued a Bulletin
 - Alaska issued Emergency Regulations to make the symptoms of COVID-19 covered under the state's Comprehensive Health Insurance Association Reinsurance Program.
 - Colorado issued an Executive Order closing all non-essential businesses.
 - Florida issued a Bulletin encouraging insurers to be flexible with premium payments.
 - Georgia issued a Directive advising insurers to, among other things, suspend preauthorization review for scheduled surgeries or hospital admissions.
 - <u>Idaho</u> issued a Public Health Order closing all non-essential businesses.
 - Indiana issued a Notice providing guidance regarding extended deadlines for license, class, and exam requirements.
 - <u>Iowa</u> issued a Bulletin providing guidance and relief regarding extended deadlines for licensure.
 - Kentucky issued a Letter clarifying that insurance services are considered life-sustaining businesses for the purposes of the state's stay-at-home order.
 - Maine issued a Press Release urging anyone who is recently unemployed to consider enrolling in coverage.
 - Minnesota issued an Executive Order closing all non-essential businesses.
 - Oregon issued a Press Release providing guidance regarding business interruption coverage and an Emergency Order requiring insurers to, among other things, institute a grace period of premium payments on all insurance policies issued in the state.
 - Rhode Island issued a Bulletin requesting that insurers provide insureds with flexibility and extend grace periods for premium payments.
 - South Carolina issued a Bulletin advising all insurers that they should work with residents and businesses to, among other things, extend deadlines of premium payments.
 - South Dakota issued a Bulletin offering best practices or insurers and providers, including suggestions to refrain from balance billing.
 - Texas issued a Bulletin providing guidance to insurers regarding filing deadlines and fees.
 - Washington issued an Emergency Order requiring insurers that sell property and casualty policies to provide a grace period for policyhol ders to pay their insurance premiums.





* Most notably, a brief overview chart is provided below with respect to the recent stay-at-home orders in California, *Colorado*, Connecticut, Delaware, the District of Columbia, Hawaii, *Idaho*, Illinois, Indiana, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, *Minnesota*, Mississippi, New Jersey, New Mexico, New York, Ohio, Pennsylvania, Vermont, Virginia, Washington, West Virginia, and Wisconsin. Please note, the answers provided are brief. If you would like to see the specific language of the order, please use the hyperlinked state to direct you to the broader state-specific entry. A number of municipalities in other states have enacted their own stay-at-home or stay-in-place orders. If you have any questions about particular municipalities, please let us know.

- * Many of the states have issued bulletins that contain the following information:
 - Information Access. Asks insurers to inform insureds of available benefits, quickly respond to insured inquiries, and consider revisions needed to streamline response and benefits for insureds.
 - **Testing**. Requests/requires insurers to waive cost-sharing for (1) COVID-19 testing and (2) in-network provider office visits, urgent care center visits, and emergency room visits.
 - Telehealth Delivery of Services. Reminds insurers to ensure their telehealth programs are robust and will be able to meet increased demand.
 - Network Adequacy and Access to Out-of-Network Services. Requests insurers to verify their provider networks are adequate to handle a potential increase in
 the need for health care services and requests insurers that do not have a provider in their networks with the appropriate training/experience to meet the health
 care needs of insureds make exceptions to provide access to an out-of-network provider at the in-network cost-sharing level.
 - Immunizations. In the event an immunization becomes available, requests that insurers immediately cover the immunization at no-cost sharing.
 - Access to Prescription Drugs. Asks insurers to make expedited formulary exceptions in certain circumstances and requests that insurers allow insureds to fill
 and refill prescription medications for up to a 90-day supply/until the prescription expires.

Not every state has followed this model and some states deviate in important respects (e.g., by specifically addressing surprise billing, ambulance services, etc.). The below survey details the available state resources, the date on which the resources were issued, and a brief summary offering a general overview of the guidance offered. In particular, it focuses on cost-sharing waivers, telehealth services, treatment of out-of-network providers offering in-network services, etc.

* We envision this as an evergreen document that we will aim to update **daily**. If you operate in a state and notice that we have not included the most up-to-date guidance, please let us know.





States	Does the state have a shelter-in-place/mass business closure order in place?	Does it cite or reference federal guidance governing critical infrastructure?	Is the insurance industry deemed an "essential business" or otherwise exempt from a closure obligation?	
Alabama	NO			
Alaska	NO			
Arizona	NO			
Arkansas	NO			
California	YES	YES	YES	
Colorado	YES	NO	YES	
Connecticut	YES	YES	YES	
Delaware	YES	NO	YES	
D.C.	YES	YES	YES	
Florida	NO			
Georgia	NO			
Hawaii	YES	YES	YES	
Idaho	YES	YES	YES	
Illinois	YES	NO	YES* (FINANCIAL INSTITUTIONS)	
Indiana	YES	YES	YES	
Iowa	NO			
Kansas	NO			
Kentucky	YES* (RETAIL-SPECIFIC)	NO	YES* (RETAIL-SPECIFIC)	
Louisiana	YES	YES	YES	
Maine	YES	YES	YES	
Maryland	YES	YES	YES	
Massachusetts	YES	YES	YES	
Michigan	YES	YES	YES	
Minnesota	YES	YES	YES	
Mississippi	YES	YES	YES	
Missouri	NO	120	120	
Montana	NO			
Nebraska	NO			
Nevada	NO			
New Hampshire	NO			
New Jersey	YES* (RETAIL-SPECIFIC)	NO	YES* (RETAIL-SPECIFIC)	
New Mexico	YES	NO	YES	
New York	YES	NO	YES	
North Carolina	NO		120	
North Dakota	NO			
Ohio	YES	YES	YES	
Oklahoma	NO	~ Adi/	220	
Oregon	NO			
Pennsylvania	YES	YES	YES	
Rhode Island	NO	± ±41,7	LUJ	





States	Does the state have a shelter-in-place/mass business closure order in place?	Does it cite or reference federal guidance governing critical infrastructure?	Is the insurance industry deemed an "essential business" or otherwise exempt from a closure obligation?
South Carolina	NO		
South Dakota	NO		
Tennessee	NO		
Texas	NO		
Utah	NO		
Vermont	YES	NO	YES* (FINANCIAL INSTITUTIONS)
Virginia	YES* (RETAIL-SPECIFIC)	NO	YES* (RETAIL-SPECIFIC)
Washington	YES	NO* (BUT MIRRORS LANGUAGE)	YES
West Virginia	YES	YES	YES
Wisconsin	YES	YES	YES
Wyoming	NO		





Table of Contents

Alabama	6	Montana	26
Alaska	6	Nebraska	26
Arizona	8	Nevada	27
Arkansas	8	New Hampshire	27
California	9	New Jersey	28
Colorado	10	New Mexico	29
Connecticut	11	New York	30
Delaware	12	North Carolina	32
D.C	13	North Dakota	33
Florida	14	Ohio	34
Georgia	15	Oklahoma	35
Hawaii	16	Oregon	36
Idaho	16	Pennsylvania	36
Illinois	17	Rhode Island	38
Indiana	17	South Carolina	38
Iowa	18	South Dakota	39
Kansas	19	Tennessee	39
Kentucky	19	Texas	40
Louisiana	20	Utah	41
Maine	20	Vermont	41
Maryland	21	Virginia	42
Massachusetts	22	Washington	43
Michigan	23	West Virginia	44
Minnesota	24	Wisconsin	45
Mississippi	25	Wyoming	46
Missouri	25		



State	State Resources	Date Issued	Summary
Alabama	Bulletin 2020-03	03/25/2020	 Extends pre-licensing deadlines 60 days past expiration date. Waives CE class proctoring requirements through the end of April.
	Consumer Notice FAQs	03/25/2020	Details the specific actions of major health insurers in the state.
	Consumer Notice	03/18/2020	Assures consumers that ALDOI is closely monitoring insurance issues related to COVID-19.
	FAQs	03/17/2020	Provides guidance with respect to coverage under travel insurance policies.
	Bulletin 2020-02 Press Release	03/13/2020	 Asks insurers to: Waive any cost-sharing for COVID-19 laboratory tests and the cost-sharing for an innetwork provider office visit, in-network urgent care center visit, or an emergency room visit when testing for COVID-19. Review and ensure their telehealth programs with participating provider are ready to meet any increased demand. If an insurer does not have a provider in its network with the appropriate training and experience to meet the particular health needs of an insured, make exceptions to provide access to an out-of-network provider at the in-network cost-sharing. In the event an immunization becomes available, immediately cover the immunization with no cost-sharing for all covered members. Make expedited formulary exceptions.
Alaska	Adoption Order 20- 01 Notice of Adoption of Emergency Regulation	03/25/2020	Provides that cardio-respiratory failure and shock will be covered by Alaska's Comprehensive Health Insurance Association Reinsurance Program.
	B20-10	03/20/2020	 Encourages insurers to allow policyholders to self-audit and self-report changes in their exposure or risk profile and adjust premiums accordingly. Notes that for reasonable and consistently applied premium adjustments or audit accommodations will not be pursued by the Division as violations of statutes governing returning



State	State Resources	Date Issued	Summary
			premiums to policyholders or the frequency of premium changes, nor will they be considered out of compliance with approved rating plans, rules, or policy language.
	B20-09	03/19/2020	 Clarifies that respiratory panel tests are no longer subject to the zero cost-sharing requirement. Explains that under IRS Notice 2020-15, health plans that otherwise qualify as High Deductible Health Plans will not lose that status merely because they cover the cost of testing for treatment of COVID-19 before plan deductibles have been met. Notes that under the newly-enacted federal law, insurers offering group or individual coverage are prohibited from imposing prior authorization or other medical management techniques for COVID-19 testing products, items, and services.
	Regulatory Order No. R20.02	03/18/2020	Extends filing timeframes for required for external healthcare reviews.
	B20-08	03/18/2020	 Prohibits insurers from terminating insurance contracts due to non-payment. Encourages insurers to work with policyholders in the collection of premiums and to waive all late fees. Expects that any problems with premium payment during the extended period would be resolved by the insurer without a consumer complaint being filed.
	B20-07	03/17/2020	Provides guidance with respect to coverage of telehealth services.
	B20-06	03/16/2020	Extends filing timeframes for rate, form, and advertisement filings.
	FAQs	03/16/2020	Provides guidance with respect to coverage under travel insurance policies.
	B20-03	03/03/2020	 Expects insurers to: Provide for early refills or replacements of lost or damaged medications and expects this flexibility to continue while the potential for quarantine is high. Allow affected consumers to obtain emergency supplies or refills without applying additional authorization requirements.



State	State Resources	Date Issued	Summary
Arizona	Press Release	03/13/2020	Provides guidance with respect to coverage under travel insurance policies.
	Executive Order 2020-07 Press Release	03/11/2020	 Requires all insurers regulated by the state to: Cover COVID-19 diagnostic testing from all qualified laboratories without regard to whether the laboratory is in-network. Waive all cost-sharing requirements for consumers related to COVID-19 diagnostic testing. Cover telemedicine visits at a lower cost-sharing point for consumers than the same inoffice service to encourage utilization of telemedicine for the duration of the state's public health emergency.
Arkansas	Bulletin No. 10- 2020	03/24/2020	 Suspends the requirement that consumers sign for their pharmacist services is an impediment to the rendering of assistance to our citizens affected by the virus. Suspends the requirement that pharmacy plan beneficiaries sign for the rendering of pharmacy services during the 60-day period.
	Bulletin No. 9-2020	03/24/2020	Provides guidance to insurers regarding managing corporate governance issues and business interruption coverage.
	Bulletin No. 7-2020	03/24/2020	Asks PBMs to confirm price increases with the Department when they occur.
	Bulletin No. 6-2020 Press Release	03/20/2020	 Advises all insurers and other regulated industries that they must continue to adjust claims as expeditiously as possible during this emergency. Issues a 60-day moratorium on the cancellation/non-renewal of insurance policies for the non-payment of premiums for residents diagnosed with/positively tested for COVID-19. Notes that this moratorium is not a waiver; it is only an extension or grace period in which to pay premiums.
	Executive Order 20- 05	03/13/2020	Provides guidance with respect to coverage of telehealth services.



State	State Resources	Date Issued	Summary
California	Press Release	03/20/2020	• Urges uninsureds and those who have lost coverage due to COVID-19 to purchase health coverage through health plans and health insurers offering coverage outside the exchange during a new special enrollment period until June 20, 2020.
	Executive Order N- 33-20 FAQs Critical Infrastructure Workers List	03/20/2020	 Orders all state residents to stay home or at their place of residence, except as needed to maintain continuity of operation of the federal critical infrastructure sectors. Exempts workers who are needed to process and maintain systems for processing financial transactions and services (e.g., payment, clearing, and settlement; wholesale funding; insurance services; and capital markets activities).
	Press Release	03/20/2020	Urges uninsured residents and those that have lost their coverage to purchase coverage through Covered California—or though other health plans/insurers offering coverage outside the exchange—during a Special Enrollment Period.
	Notice	03/18/2020	 Encourages all insurers and other licensees to take steps to maintain their ability to process and pay insurance claims and provide other required consumer services for insureds in a "reasonable and timely manner." Notes that the Department of Insurance intends to "consider the extraordinary circumstances relating to the COVID-19 outbreak and the resulting disruptions to normal business operations when evaluating whether insurers and other Department licensees have complied with their respective legal and commercial obligations during the COVID-19 pandemic."
	Notice Press Release	03/18/2020	 Requests that all insurers provide their policyholders with at least a 60-day grace period to pay insurance premiums. Requests that no policies are cancelled for nonpayment of premium due to COVID-19.
	Press Release	03/18/2020	Directs health insurers to submit emergency plans detailing how they will ensure continued access to medically necessary health care services for the duration of the declared COVID-19 state of emergency.



State	State Resources	Date Issued	Summary
	Bulletin Press Release Screening Letter	03/05/2020	 Directs insurers providing commercial health insurance to immediately reduce cost-sharing (i.e., co-pays, deductibles, and coinsurance) to zero for medically necessary screening and testing of COVID-19 and associated hospital, emergency department, urgent care, and provider office visits where the purpose of the visit is to be screened and/or tested for COVID-19. Reminds plans that California law requires emergency care without prior authorization (whether it is at an in-network or out-of-network hospital) and that "balance bills" related to the testing of COVID-19 are unlawful.
Colorado	Executive Order 2020-017 Press Release FAQs A mended Public Health Order 20-24	03/25/2020	 Requires residents of the state to stay at home, unless engaging in a critical activity or working at a critical business. Clarifies that certain financial institutions are critical businesses, including banks and credit unions; insurance, payroll, and accounting services; and services related to financial markets.
	Emergency Regulation 20-E-02 Press Release Consumer Advisory	03/19/2020	• Establishes a Special Enrollment Period for uninsured residents to get coverage from March 20, 2020 through April 3, 2020.
	Emergency Regulation	03/17/2020	 Establishes the coverage and cost-sharing requirements for commercial insurers related to claims arising from the testing and treatment of COVID-19. Requires insurers to provide coverage for COVID-19-related in-network telehealth services with no cost-share for the covered person. Requires insurers to cover at least one additional early refill of all necessary prescriptions to ensure that the covered person has access to necessary medications. Directs insurers to cover cost-sharing for an in-network provider office visit, an in-network urgent care center visit, and an emergency room visit when a covered person is seeking testing for COVID-19.
	Bulletin B-4.104 Consumer Advisory	03/09/2020	Directs insurers to: Provide telehealth services to cover COVID-19 related in-network telehealth services at no cost share (including co-pays, deductibles, and coinsurance that would normally apply to the telehealth visit).



State	State Resources	Date Issued	Summary
			 Cover an additional one-time early refill of any necessary prescriptions to ensure people have their necessary medications should they want to limit their close contact with others. Ensure that coverage is provided for COVID-19 testing without the requirement that consumers pay co-pays, deductibles, or co-insurance.
Connecticut	Bulletin FS-36 Executive Order No. 7K	03/24/2020	Provides conditional regulatory relief and assistance to licensed insurers with respect to certain regulatory filing requirements.
	Bulletin IC-40	03/24/2020	 Requests that all insurers provide their insureds with at least a 60-day grace period to pay insurance premiums so that insurance policies are not cancelled for nonpayment of premium during COVID-19. Requests that all insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers take steps to ensure that customers have the ability to make prompt insurance payments.
	Notice	03/23/2020	Provides guidance regarding extended deadlines for license requirements.
	Notice	02/23/2020	Details the recent IRS guidance on COVID-19-related employee medical leave and new payroll tax credits.
	Executive Order 7H Press Release	03/20/2020	 Directs non-essential businesses to reduce the in-person workforce at each business location by 100% from pre-state of emergency declaration employment levels. Cites the federal government guidance and explicitly exempts banks, insurance companies, check cashing services, and other financial institutions.
	Notice	03/19/2020	Provides guidance to insurers regarding managing corporate governance issues and business interruption coverage.
	Bulletin IC-39	03/09/2020	Encourages insurers/health care centers to:



State	State Resources	Date Issued	Summary
			 Waive any cost-sharing related to COVID-19 laboratory tests. Waive any cost-sharing related to an in-network provider office visit, urgent care visit, or emergency room visit when the purpose of such a visit is to be tested for COVID-19. Offer/waive cost-sharing for medical advice and treatment of COVID-19 via telehealth services. If in-network availability is unreasonable with regards to time and distance, permit enrollees, certificate holders, and insureds to obtain testing and treatment for COVID-19 out-of-network and provide coverage for such testing and treatment the same as on an in-network basis. Authorize payment to pharmacies for a 90-day supply of maintenance prescription medications for individuals. Extend time limits for providers, enrollees, certificate holders, and insureds to submit claims for the testing or treatment of COVID-19.
	Press Release	03/10/2020	Announces that Connecticut regulators are working with insurers to cover COVID-19 testing and to assure access to maintenance prescription drug medications.
	Press Release Notice	03/11/2020	Instructs travel insurers to accommodate travel cancellation requests under the terms of travel insurance policies "taking into account the seriousness of the circumstances."
Delaware	Sixth Modification of the Declaration of a State of Emergency Press Release	03/24/2020	Requires that insurers cease cancellations or nonrenewals of insurance policies due to nonpayment throughout the duration of the state of emergency for those residents and businessowners who are experiencing a loss of income.
	Fourth Modification of the Declaration of a State of Emergency FAQs List of Essential Businesses	03/22/2020	Deems insurance carriers, agencies, brokerages, and other insurance-related activities to be essential businesses.
	Bulletin No. 116 Press Release	03/20/2020	Requests that all admitted and non-admitted carriers doing business in Delaware suspend cancellations and nonrenewals due to nonpayment of premium during the pendency of the Governor's declared State of Emergency.



State	State Resources	Date Issued	Summary
			 Encourages policy holders to contact their carriers to discuss their options if they are suffering a hardship as a result of the COVID-19 related restrictions. Expects carriers who are covering claims under insurance policies to which the telemedicine provision applies to fully reimburse providers who are providing telemedicine services through telehealth in accordance with the law. Encourages carriers to waive all pre-authorization requirements for the lab testing and treatment of confirmed or suspected COVID-19 patients.
	Bulletin No. 115 Press Release	03/09/2020	 Reminds insurers that COVID-19 laboratory tests are an essential health benefit that must be covered under individual and small group comprehensive health insurance policies and contracts. Directs insurers to ensure that their telehealth and telemedicine programs are robust enough to meet a potential new high demand. Expects insurers to provide for early refills or replacements of lost or damaged medications and expects this flexibility to continue when the potential for quarantine is high. Reminds insurers that the Delaware Patient Bill of Rights contains prohibitions against balance billing. Encourages insurers to ensure that out-of-pocket costs are not a barrier to people seeking testing for and treatment of COVID-19 by covering diagnostic testing and waiving patient cost sharing (i.e., deductibles, co-pays, and coinsurance), including for in-person and telemedicine visits.
District of Columbia	Mayor's Order 2020-053 Press Release	03/24/2020	 Closes all non-essential businesses and enumerates the essential businesses that may remain open. Incorporates the federal guidance. Identifies professional services, including insurance, as essential, but only when necessary to assist in compliance with legally mandated activities, essential businesses, or essential government functions.
	Commissioner's Order 01-2020	03/20/2020	 Requires all health insurers to do the following: Waive all costs associated with screening, testing and treatment for COVID-19. Hold harmless the enrollee who receives health care services as it relates to screening, testing and treatment of COVID-19 at an out-of-network provider. Cover the costs of an immunization or vaccine if and when one becomes available for COVID-19.



State	State Resources	Date Issued	Summary
			 Enhance their coverage of telehealth programs to ensure they are robust enough to handle any increased demand. Allow enrollees to obtain refills of their prescription medications before the scheduled refill date. Not cancel or non-renew any health benefit plan without express consent from the Commissioner.
Florida	OIR-20-04M	03/25/2020	 Encourages insurers to be flexible with premium payments by considering the following: Relaxing due dates; Extending grace or reinstatement periods; Waiving late fees and penalties; and Allowing payment plans.
	CFO Statement on Travel Insurance CFO Letter to Travel Insurance Agents and Insurers	03/16/2020	Provides guidance with respect to coverage under travel insurance policies.
	OIR-20-03M	03/16/2020	 Directs companies regulated by the Office of Insurance Regulation (OIR) to review and update their Business Continuity Plans and/or Continuity of Operation Plans. Requires insurers or other entities that activate their Business Continuity and/or Continuity of Operations Plan in response to COVID-19 to notify OIR within the same day.
	Executive Order 20- 52	03/09/2020	Declares a state of emergency.
	OIR-20-01M Executive Order 20- 51	03/06/2020	 Directs insurers to consider all practicable options to reduce the barriers of cost-sharing for testing and treatment of COVID-19 during the public health emergency. Reminds insurers of the state's balance billing protections (i.e., emergency services for an emergency medical condition must be covered at the in-network level regardless of which provider performs the services, etc.).



State	State Resources	Date Issued	Summary
	OIR Informational Memorandum 20- 02M	03/10/2020	Reminds all insurers, HMOs, and other health entities comply with Florida laws which allow for early prescription refills in the event of a state of emergency.
Georgia	Directive 20-EX-7	03/26/2020	 Advises issuers to suspend preauthorization review for scheduled surgeries or admissions at hospitals for 60 days. Advises issuers to suspend preauthorization requirements for post-acute placements. Urges issuers to waive any requirements for location-based credentialing for 60 days. Urges issuers to pay claims as soon as possible.
	News Release	03/25/2020	Urges individuals to utilize telemedicine options available to them from their health insurers.
	Directive 20-EX-6	03/25/2020	Provides guidance on the temporary suspension of certain industrial loan regulations.
	Press Release Bulletin 20-EX-4	03/24/2020	 Encourages all counties and municipalities to consider insurance services as essential business services in any orders for non-essential businesses to close in response to COVID-19. Details the core functions that insurers should be completing in their office.
	Directive 20-EX-5 Press Release	03/20/2020	 Instructs property and casualty insurers not to cancel any commercial policies for non-payment, particularly those dealing with business interruption or business income coverage, for the next 60 days. Calls on health insurers to refrain from cancelling policies for non-payment until further notice.
	Directive 20-EX-4 Press Release	03/17/2020	 Asks labs providing COVID-19 testing to be mindful of what they charge and requests that insurers reimburse those labs at an in-network rate. Notes that the Insurance Services Office has uploaded two forms with respect to Business Interruption Coverage that relates to COVID-19 and that the Office is willing to expedite the review process for such coverages to enable brokers/insurers to offer such coverage to businesses immediately.



State	State Resources	Date Issued	Summary
	Directive 20-EX-3 Press Release	03/09/2020	 Asks insurers to take the following immediate measures related to the potential impact of COVID-19: Consider options to reduce potential barriers of cost-sharing for testing and treatment of COVID-19 during the outbreak/waive any cost-sharing for COVID-19 laboratory tests. Waive cost-sharing for an in-network provider office visit, an in-network urgent care center visit, and an emergency room visit when testing for COVID-19. Ensure that their telehealth programs will be able to meet increased demand. In the event a vaccine becomes available, cover the immunization with no cost-sharing for all covered members. Make expedited formulary exceptions.
Hawaii	Third Supplementary Proclamation Press Release	03/23/2020	 Requires all persons to stay at home or in their place of residence, except as necessary to maintain continuity of operations of the federal critical infrastructure. Deems essential professional services, including insurance services.
	Commissioner's Memorandum 2020-2 Press Release	03/19/2020	Notes that licensees will be extended past the April 16 date until examinations are made available.
	Commissioner's Memorandum 2020-1	03/18/2020	Extends filing timeframes for rate, form, and advertisement filings.
	Consumer Alert	03/12/2020	 Warns consumers against price gouging and scams. Provides guidance with respect to coverage under travel insurance policies.
Idaho	Health Department Order List of Essential Businesses Emergency Declaration Press Release FAQs	03/25/2020	 Orders all individuals living in the state to self-isolate at their place of residence, unless they provide or receive certain essential services, engage in certain essential activities, and/or work for essential businesses. Cites the federal government guidance and deems certain financial services to be essential, including banks, credit unions, insurance, and services related financial markets.
	Press Release	03/09/2020	Notes that insurers are voluntarily waiving cost-sharing for COVID-19 testing.



State	State Resources	Date Issued	Summary
			• Requests that, if a case ends up out-of-network, providers refrain from balance billing.
Illinois	Executive Order 2020-10	03/20/2020	 Requires all individuals currently living within the state to stay at home or at their place of residence, unless they work in essential businesses and operations. Deems financial institutions (e.g. banks, currency exchanges, consumer lenders, credit unions, appraisers, title companies, financial markets, trading and futures exchanges, affiliates of financial institutions, entities that issue bonds, related financial institutions, and institutions selling financial products).
	Company Bulletin 2020-02	03/02/2020	 Notes that the CDC and the Illinois Department of Public Health have agreed to bear the cost of the lab test for the presence of COVID-19 (however, clarifies that it is possible that hospitals will still charge their own fees for collecting the specimens). Reminds insurers of the state's balance billing provisions (i.e., requires insurers to impose no greater cost-sharing on an enrollee than their coverage provides at the in-network level when the enrollee receives care from certain specialists at participating network hospitals or ambulatory surgical centers, even if the specialists themselves are not participating providers; requires coverage of emergency services for an emergency medical condition at the in-network level regardless of which provider performs the services). Encourages insurers to consider all feasible and prudent options to reduce the barriers of cost-sharing for testing and treatment of COVID-19 during the outbreak. Encourages insurers to cover enrollees for prescription drug refills even when the enrollee has not yet reached their scheduled refill date, provided the prescription itself would remain valid beyond the refill date. Requires travel insurance—absent an applicable exception—to presumptively cover such risks related to COVID-19.
Indiana	Notice	03/24/2020	• Provides guidance regarding extended deadlines for license, class, and exam requirements.
	Executive Order 20- 08 FAQs Press Release	03/23/2020	 Requires all individuals living in the state to stay at home or in their place of residence, except if undertaking essential businesses or operations. Exempts insurance companies, underwriters, agents, brokers, and related insurance claims and agency services.



State	State Resources	Date Issued	Summary
	Executive Order 20- 05 Press Release	03/19/2020	 Requests that insurers institute a 60-day moratorium on policy cancellations for non-payment of premiums. Notes that this does not suspend a policyholder's obligation to make payments. Asks health insurers to cover COVID-19 testing without requiring prior authorization. Requests that health insurers not increase prices or coverage costs that involve medical care for COVID-19.
	Press Release	03/19/2020	Encourages license applicants, licensees and course providers to utilize online licensing services and avoid paper processes when possible.
	FAQs	03/17/2020	Notes that most of the major insurers have committed to waive cost-sharing for COVID-19 testing.
Iowa	Bulletin 20-05	03/25/2020	Provides guidance and relief regarding extended deadlines for license.
	Bulletin 20-04	03/19/2020	Requests that all health insurers and HMOs: Allow a premium payment grace period for insureds. Put in place procedures allowing individual and small employer policyholders affected by the economic disruptions resulting from CO VID-19 to request extensions for premium payments beyond the insurers' normal payment due dates.
	Bulletin 20-03	03/17/2020	Requests that while insurers implement business contingency plans that they reach out to the Department for any assistance needed.
	FAQs	03/13/2020	 Notes that four of the major health insurance carriers have committed to waive cost-sharing and copayments for COVID-19 testing. Provides guidance with respect to coverage under travel insurance policies.



State	State Resources	Date Issued	Summary
Kansas	FAQs	03/18/2020	 Notes that it is unlikely that Business Interruption Coverage would cover losses related to COVID-19, as most business policies have a communicable disease exclusion. Notes that the Department will not be suspending any license requirements at this time. Provides consumers with guidance related to coverage of COVID-19-related services.
	Bulletin 2020-01 Press Release	03/17/2020	 Announces alternative working arrangements, potential delays in processing license applications and approving company filings, and suspension of certain regulatory requirements. Does not suspend statutes that require insurers to pay claims promptly.
	Press Release	03/13/2020	Notes that all major medical insurance carriers have committed to waiving the cost sharing for COVID-19 testing and that the state will not mandate waiving costs.
Kentucky	Clarification Letter	03/25/2020	Clarifies that insurance services are considered life-sustaining businesses.
	Executive Order	03/23/2020	 Orders all in-person retail business that are not life-sustaining to close. Classifies banks, credit unions, check cashing, wire transfer, and other financial services as life-sustaining retail businesses.
	Press Release	03/16/2020	Announces that the Department of Insurance will be extending the time requirements for completion and submission of continuing education hours for March and April licensees.
	Executive Order 2020-220	03/09/2020	 Requires insurers to: Waive all cost-sharing (i.e., copayments, coinsurance, and deductibles) for screening and testing for COVID-19, including hospital, emergency department, urgent care, provider office visits, lab testing, telehealth, and any immunizations that are made available. When prescription drug coverage exists, allow insured individuals to obtain refills of their prescriptions even if the prescription was recently filled, consistent with approval from patients' health care providers and/or pharmacists.



State	State Resources	Date Issued	Summary
Louisiana	Emergency Rule 38 Press Release	03/24/2020	Provides guidance with respect to temporary licensing of certain insurance producers.
	Emergency Rule 37 Press Release	03/23/2020	Provides guidance with respect to coverage of telehealth services.
	Proclamation No. JBE-2020-33 Fact Sheet	03/22/2020	 Directs all individuals within the state to stay at home unless performing an essential activity. Incorporates by reference the federal guidelines on essential services (e.g., "workers who are needed to process and maintain systems for processing financial transactions and services" like payment, clearing, and settlement; wholesale funding; insurance services; and capital markets activities).
	Emergency Rule 36	03/17/2020	 Requires all health insurers to waive all cost-sharing associated with testing and treatment of COVID-19. Requires all health insurers to waive any prior authorization requirements or restrictions for screening and diagnostic testing for COVID-19. Directs health insurers to verify that their provider networks are adequate to handle the potential increase and need for healthcare services for COVID-19.
Maine	Press Release	03/25/2020	• Urges anyone who is recently unemployed due to COVID-19 to consider enrolling in coverage.
	Executive Order Press Release	03/24/2020	 Requires all non-essential businesses to cease operations. Clarifies that legal, business, professional, environmental permitting, and insurance services are all essential businesses and operations.
	Supplemental Order	03/20/2020	Issues guidance regarding remote delivery of health services.
	Supplemental Order	03/19/2020	Issues guidance regarding credentialing.
	Bulletin 442 Consumer Guide to	03/12/2020	



State	State Resources	Date Issued	Summary
	Insurance Provisions and Resources in Maine		 Directs insures to make all screening and testing services available with no deductible, copayment, or other cost sharing of any kind. Clarifies that the only situation in which insurers will be permitted to impose out-of-network charges is when the enrollee was offered the service in-network without additional delay but chose instead to visit an out-of-network provider or be tested by an out-of-network laboratory. If/when an immunization becomes available, requires insurers to immediately cover the cost of the vaccine and all associated costs of administration without cost-sharing. Reminds insurers of Maine's balance billing protections (i.e., requires coverage of emergency services with network-level cost-sharing regardless of the status of the emergency provider). Requires carriers to allow enrollees to obtain one-time refills of their prescription medications before the scheduled refill date. Provides guidance with respect to coverage under travel insurance policies.
Maryland	Bulletin No. 20-11	02/23/2020	 Encourages licensees to utilize remote claim handling technologies to the greatest extent possible. Notes that prompt payment of known claim obligations should be a top priority.
	Interpretive Guidance	03/23/2020	Enumerates the essential businesses that may remain open, including the financial services sector, including insurance companies.
	Bulletin 20-10 Press Release	03/20/2020	 Encourages all insurers to make reasonable accommodations so that individuals and businesses do not lose coverage due to non-payment of premiums during the COVID-19 state of emergency. Provides that reasonable accommodations may include suspension of premiums due, extension of billing due dates and premium grace periods, and waiver of installment and late payment fees.
	Bulletin 20-09 Press Release	03/20/2020	Provides guidance with respect to coverage under travel insurance policies.
	FAQs	03/19/2020	Provides an overview of the impact COVID-19 will have on product licensing capabilities.
	Advisory	03/18/2020	Offers an overview of Business Interruption Coverage.



State	State Resources	Date Issued	Summary
	Press Release	03/16/2020	Notes that the department is primarily focused on protecting costumers from unfair treatment by insurers during the COVID-19 pandemic.
	Bulletin 20-07	03/13/2020	Notes that the CMS has developed a HCPCS code that can be used by laboratories to bill for certain COVID-19 tests.
	Press Release	03/12/2020	Offers an overview of IRS guidance governing the waiving of cost-sharing arrangements by high-deductible health plans in response to COVID-19.
	Bulletin 20-06 Emergency Regulation 31.01.02 FAQs	03/10/2020	 Requires insurers to waive any cost-sharing (i.e., co-payments, coinsurance, and deductibles): For any visit to diagnose or test for COVID-19 regardless of the setting of the testing. For laboratory fees to diagnose or test for COVID-19. For vaccination for COVID-19, when a vaccine becomes available. Requires insurers to evaluate requests to use an out of network provider to perform diagnostic testing of COVID-19 solely on the basis of whether the use of the out-of-network provider is medically necessary or appropriate. Requires insurers to consider an adverse decision on a request for coverage of diagnostic services for COVID-19 an emergency case for which an expedited grievance procedure is required under Maryland law.
Massachusetts	FAQs Press Release	03/24/2020	Details the specific actions of major health insurers in the state.
	Executive Order Press Release COVID-19 Essential Services	03/23/2020	 Orders all businesses that do not provide essential services to close their physical workplaces and facilities to workers, customers, and the public. Classifies workers who are needed to process and maintain systems for processing financial transactions and services (e.g., insurance services) as essential.
	Bulletin 2020-05 Press Release	03/23/2020	Requests that insurers do the following: Explain grace periods that usually allow stressed policy holders experiences significant financial hardship to delay payments without coverage being terminated.





State	State Resources	Date Issued	Summary
			 Work with employers or individuals experiencing financial hardships to find the best ways to address concerns with the timing of premium payments. Explore all ways to relax due dates for from premium payments.
	Bulletin 2020-04 Press Release	03/16/2020	Provides guidance with respect to coverage of telehealth services.
	Bulletin 2020-03	03/12/2020	Notes that for a limited-time there is a Special Enrollment Period for qualified individuals who are currently without insurance to enroll in health coverage.
	Press Release	03/11/2020	Provides guidance with respect to coverage under travel insurance policies.
	Bulletin 2020-02	03/06/2020	 Expects insurers to: Promote telehealth options, including removal of applicable cost-sharing for such services; enabling covered members to seek screening, evaluation, diagnosis, and/or treatment for COVID-19 to reduce the need for patients to come to medical offices. Relax out-of-network requirements and procedures when access to urgent testing or treatment is unavailable from in-network providers. Forego any cost-sharing (i.e., copayments, deductibles, or coinsurance) for medically necessary COVID-19 testing, counseling, vaccinations, and treatment at in-network doctors' offices, urgent care centers, or emergency rooms and out-of-network doctors' offices, urgent care centers, or emergency rooms when access to urgent testing or treatment is unavailable from in-network providers.
Michigan	Executive Order 2020-21 Press Release	03/23/2020	 Directs all businesses and operations to temporarily suspend in-person operations that are not necessary to sustain or protect life. Directs residents to stay in their homes unless they're a part of that critical infrastructure workforce, engaged in an outdoor activity, or performing tasks necessary to the health and safety of themselves or their family. Explains that critical infrastructure workers include workers in the insurance industry, but only to the extent that their work cannot be done by telephone or remotely.



State	State Resources	Date Issued	Summary
	Bulletin 2020-08- INS	03/20/2020	Provides guidance to insurers regarding managing corporate governance issues and filing deadlines.
	Survey Request	03/19/2020	Requests feedback on responses to COVID-19 from all Michigan consumer finance licensees and registrants by March 20, 2020.
	Press Release	03/12/2020	 Announces expanded access to telemedicine by immediately allowing Medicaid beneficiaries to receive services in their home to combat COVID-19. Notes that the major insurers in the state will cover the use of virtual care/telemedicine and waive cost-sharing for COVID-19 testing.
Minnesota	Executive Order 20- 20 Press Release FAQs	03/25/2020	 Orders all persons currently living in the state to stay at home, except to engage in essential/critical activities and work. Clarifies that financial service workers—including workers at banks, credit unions, insurance companies, insurance agencies, and other financial service workers identified in federal guidance—are essential.
	Consumer Alert FAQs	03/19/2020	Provides guidance to insurers regarding managing corporate governance issues and business interruption coverage.
	Letter	03/13/2020	 Requests that health carriers eliminate all cost-sharing for COVID-19 testing, including costs associated with an office visit or urgent care visit to be tested. Strongly encourages health plans to limit or eliminate cost sharing for all forms of treatment for COVID-19 for in-network providers. Asks that should in-network providers be unavailable to provide services that health carriers make allowances for out of network care. Requests that health carriers should take any necessary steps to expand the availability of telemedicine services for their enrollees. Request that health carriers provide a one-time refill of covered prescription medications prior to the expiration of the waiting period between refills.



State	State Resources	Date Issued	Summary
	Press Release	03/13/2020	Provides guidance with respect to coverage under travel insurance policies.
Mississippi	Executive Order No. 1463	03/24/2020	 Closes non-essential businesses and enumerates the essential businesses that may remain open. Deems financial services, including banks and related financial institutions, insurance, payroll, accounting, processing financial transactions, and services related to financial markets as essential.
	Bulletin 2020-03	03/24/2020	 Issues a 60-day moratorium on the cancellation/non-renewal of policies for the non-payment of premiums. Notes that this moratorium is not a waiver of premium; rather, it is a moratorium on the cancelation or non-renewal of policies for the failure to pay premiums during the applicable 60-day period.
	Bulletin 2020-02	03/23/2020	Strongly encourages insurers to allow, when requested, mid-term audits, self-audits, or other adjustments to rating bases to more accurately reflect annual exposure projections.
	Bulletin 2020-01	03/16/2020	 Directs insurers to adopt procedures that will encourage their policyholders to use telemedicine for non-emergency medical care. Notes that insurers should be aware that physician licensing requirements for telemedicine have been waived by the Board of Medical Licensures
	FAQs	03/09/2020	 Notes that the major insurers in the state are waiving the cost of medically-necessary COVID-19 testing when ordered by a licensed, authorized health care provider. Provides guidance with respect to coverage under travel insurance policies.
Missouri	Bulletin 20-6	03/24/2020	Provides guidance to insurers regarding annual statement supplemental filing deadlines.
	Bulletin 20-05 Press Release	03/21/2020	Strongly encourages insurers to:



State	State Resources	Date Issued	Summary
			 To issue a grace period that would prevent cancelations, nonrenewal, or termination coverages. To extend a grace period of at least 60 days for coverage where premium or subscription charges are unpaid.
	Bulletin 20-04	03/04/2020	Provides guidance to insurers regarding managing corporate governance issues and filing deadlines.
	Bulletin 20-03	03/03/2020	 Asks insurers providing coverage in the state to take the following immediate measures: Waive any cost-sharing for COVID-19 laboratory tests. Waive the cost-sharing for an in-network provider office visit, an in-network urgent care center visit, and an emergency room visit when testing for COVID-19. If an insurer does not have a provider in its network with the appropriate training and experience to meet the particular health care needs of an insured, make exceptions to provide access to an out-of-network provider at the in-network cost-sharing. At the time a vaccine becomes available, immediately cover the immunization at no cost-sharing for all covered members. Where appropriate, make expedited formulary exceptions.
Montana	Guidance Press Release	03/19/2020	Provides guidance with respect to coverage of telehealth services.
	Press Release Press Release	03/18/2020	 Reminds consumers of year-round options for immediate health coverage. Notes that insurance companies voluntarily assisting in virus response.
	Press Release	03/11/2020	Notes that the four major insurers in the state are voluntarily waiving customer costs (e.g., copays and deductibles) for COVID-19 testing.
Nebraska	Notice Notice	03/23/2020	• Extends license deadline by 90 days, upon request.



State	State Resources	Date Issued	Summary
	Notice	03/19/2020	Notes that the Department will not take an enforcement action against an insurer if they amend their catastrophic policies to provide pre-deductible coverage for services associated with the diagnosis and/or treatment of COVID-19.
	Consumer Alert	03/13/2020	Provides guidance with respect to coverage under travel insurance policies.
	Consumer Alert	03/11/2020	Offers updates from insurers operating in the state regarding their policies addressing COVID- 19.
Nevada	FAQs.	03/20/2020	Provides guidance with respect to coverage under travel insurance policies.
	Emergency Regulation Press Release Consumer Alert Press Release FAQs	03/05/2020	 Prohibits insurers from: Imposing an out-of-pocket cost for a provider office, urgent care center, or emergency room visit when the purpose of the visit is to be tested for COVID-19. Imposing an out-of-pocket cost for COVID-19 testing. Requires insurers to cover the costs of a COVID-19 immunization as one becomes available. Requires insurers to provide coverage for off-formulary prescription drugs if there is not a formulary drug available.
New Hampshire	Bulletin No. 20-21- AB	03/24/2020	 Allows producers and insurers to obtain electronic signatures. Notes that insures and producers should obtain the required signature after the COVID-19 situation subsides.
	Bulletin No. 20- 019-AB	03/23/2020	 Requests that all insurers work to leverage virtual audits for the completion of any audits. Notes that if an insurer is unable to complete audits within the 120-day time limit than document accordingly.
	FAQs	03/19/2020	Provides guidance regarding insureds who recently lost employer-sponsored health insurance.



State	State Resources	Date Issued	Summary
	FAQs	03/17/2020	Provides guidance to insurers regarding managing corporate governance issues and business interruption coverage.
	Press Release FAQs	03/10/2020	 Requires insurers to provide coverage, prior to application of any deductible and without cost-sharing, for the initial provider visit and test for their members who meet the CDC criteria for testing, as determined by the provider. Reminds insurers that they may not deny coverage, including mental health services provided to a quarantined individual, simply because it was provided through telemedicine. Directs insurers to take steps to ensure that members have continuous access to prescription medication by allowing one-time refills of covered prescriptions prior to the expiration of the waiting period between refills.
New Jersey	Bulletin No. 20-08	03/24/2020	 Modifies the requirement for appeals of a final internal adverse benefit determination. Suspends all filing fees.
	Bulletin No. 20-07	03/22/2020	Provides guidance with respect to coverage of telehealth services.
	Executive Order No. 7 Press Release Blog Post	03/21/2020	 Requires non-essential retail businesses to close to the public, excluding "retail functions of banks and other financial institutions." Notes that if a business is not a retail business, it may continue to operate, but it must accommodate its workforce wherever practicable for telework or work-from-home arrangements.
	Bulletin No. 20-04	03/19/2020	 Encourages insurers and insurance producers to take into consideration the difficulties residents have endured. Encourages such entities to, consistent with prudent insurance practices, relax due dates for premium payments and insurance policy-based loan payments, extend grace periods, waive late fees and penalties, allow forbearance with regard to the cancellation/non-renewal of policies, allow payment plans for premium payments, extend timeframes to complete property and automobile inspections or undergo medical exams, and exercise judicious efforts to assist affected policyholders.



State	State Resources	Date Issued	Summary
	Bulletin No. 20-03	03/10/2020	 Advises insurers to: Refrain from imposing cost-sharing for any emergency room visit at an in-network or out-of-network hospital, any in-network office visit, or any in-network urgent care center visit when the purpose of the visit is to be tested for COVID-19. Waive any cost-sharing for medically necessary COVID-19 laboratory tests provided by in-network or out-of-network laboratories. Requires insurers to develop robust telehealth programs with their participating providers. If a vaccine becomes available, encourages insurers to cover the cost of immunization at no cost-sharing. Encourages insurers to provide coverage for prescription drugs to treat COVID-19 at a preferred level of cost-sharing to ensure that all available medically necessary drugs are available. Reminds insurers of the state's balance billing protections (e.g., coverage for emergency services in hospital facilities is required at the in-network cost-sharing level even if the hospital is out-of-network or overseas).
New Mexico	Public Health Order Press Release	03/23/2020	 Requires all businesses—except essential businesses—to reduce their in-person workforce at each business by 100%. Designates banks, credit unions, insurance providers, payroll services, brokerage services, and investment management firms as essential.
	Bulletin 2020-006	03/20/2020	 Requests that all insurance companies refrain from cancelling or non-renewing policies of businesses and individuals negatively impacted by the disruption due to the non-payment of premiums during this public health emergency, or at a minimum, provide extended grace periods for payment of premiums. Requests that all insurance companies work with their insureds after the public health emergency is over to allow the insureds to catch up on past due premiums in installments without loss of coverage.
	Bulletin 2020-005	03/17/2020	Provides guidance with respect to coverage of telehealth services.



State	State Resources	Date Issued	Summary
	Press Release	03/13/2020	 Prohibits insurers from imposing cost-sharing (e.g., copays, coinsurance and deductibles) for testing and health care services related to COVID-19, including coverage of pneumonia, influenza, or any disease or condition that is the subject of a public health emergency. Requires limited benefit plans to provide notice to their members that their plans do not provide comprehensive medical coverage and to give members information on where they should go to check on their eligibility to apply for and obtain such coverage. Guarantees free COVID-19 testing and treatment for residents of the state.
		03/06/2020	 Urges insurers to ensure that insureds who may be in a COVID-19 waiting period of self-isolation can obtain a one-time refill of their covered prescription medications prior to expiration of the normal refill waiting period. Encourages insurers to "implement solutions so that out-of-pocket costs are not a barrier to people seeking testing for, and treatment of, COVID-19."
New York	Emergency Regulation Press Release	03/24/2020	Requires that New York State regulated financial institutions provide residential mortgage forbearance on property located in New York for a period of 90 days to any individual residing in New York who demonstrates financial hardship as a result of the COVID-19 pandemic.
	Bulletin 2020-004	03/20/2020	 <u>Closes</u> all non-essential businesses in the state. <u>Classifies</u> financial institutions, including insurance, as essential.
	Executive Order No. 202.8 Guidance	03/20/2020	 Advises insurers to, among other things, suspend preauthorization review for scheduled surgeries or admissions at hospitals for 90 days from the date of this letter, subject to further evaluation as the COVID-19 situation develops. Suggests insurers suspend non-essential audits of hospital payments.
	Executive Order No. 202.8 Guidance	03/20/2020	 <u>Closes</u> all non-essential businesses in the state. <u>Clarifies</u> that financial institutions, including insurance, are essential businesses.
	Insurance Circular Letter No. 7	03/19/2020	



State	State Resources	Date Issued	Summary
			 Urges all regulated entities to alleviate the adverse impacts caused by COVID-19 on consumers and small businesses by: Offering payment accommodations, such as allowing consumers to defer payments at no cost, extending payment due dates, or waiving late or reinstatement fees, where consumers are unable to make timely payments of premium or fees due to COVID-19-related disruptions; Working with consumers to avoid cancellation of insurance policies for (a) failure to pay premiums on time, (b) discovery of acts or omissions that may have increased the hazard insured against, or (c) physical changes in the property insured subsequent to issuance or last renewal that result in the property no longer meeting the insurer's underwriting standards; and Increasing resources as necessary to accommodate increased claim submissions and increased inquiries from consumers about policy coverage benefits, etc.
	Press Release	03/19/2020	 Mandates that businesses that rely on in-office personnel to decrease their office workforce by 75%, exempting essential services industries, including insurance. Announces a new directive to mortgage servicers, providing 90-day mortgage relief to mortgage borrowers impacted by COVID-19.
	Press Release	03/17/2020	Requires insurers to waive cost-sharing (e.g., deductibles, copayments, or coinsurance) for innetwork telehealth visits regardless of if they are related to COVID-19.
	Press Release	03/16/2020	Creates a Special Enrollment Period available to New Yorkers during which eligible individuals will be able to enroll in insurance coverage directly through insurers between March 16, 2020 and April 15, 2020.
	Press Release	03/13/2020	Prohibits health insurers from imposing cost-sharing on emergency room visits, in-network outpatient provider office visits, in-network urgent care center visits, in-network telehealth visits, and in-network laboratory tests when the purpose of the visit or test is to diagnose COVID-19.
	Insurance Circular Letter No. 5	03/10/2020	



State	State Resources	Date Issued	Summary
			• Requests assurance that all regulated entities (1) have preparedness plans to address the operational risk posed by COVID-19 and (2) are identifying, monitoring, and managing the financial risk associated with COVID-19.
	Insurance Circular Letter No. 4 Travel Insurance FAQs	03/06/2020	• Clarifies the Department of Financial Services' position on (1) Cancel for Any Reason benefits in the travel context and (2) potential coverage for COVID-19 under travel insurance policies.
	Insurance Circular Letter No. 3 Press Release	03/03/2020	 Advises insurers that they should waive any cost sharing for: COVID-19 laboratory tests so that cost does not serve as a barrier to access. An in-network provider office visit and an in-network urgent care center visit when testing for COVID-19. An emergency room visit when testing for COVID-19. Reminds insurers of the state's balance billing protections (e.g., if in-network providers are unable to conduct testing for COVID-19, insurers must cover testing out-of-network) and obligations related to access to prescription drugs. Directs insurers to ensure that their telehealth programs are robust and will be able to meet any increased demand. In the event an immunization becomes available for COVID-19, requires insurers to cover the immunization at no cost-sharing. Notes that that Superintendent of the Department of Financial Services will promulgate an emergency regulation to ensure that insurers do not impose cost-sharing for COVID-19.
North Carolina	Press Release	03/24/2020	 Asks the state's insurance industry to consider the following actions: Relax due dates for premiums payments. Extend grace periods. Waive late fees and penalties. Allow payment plans for premiums payments to otherwise avoid a lapse in coverage. Consider cancellation or non-renewal of policies only after exhausting other efforts to work with policyholders to continue coverage Requests that all insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers take steps to ensure that customers are able to make premium payments in safe manner including online payments.
	Press Release	03/24/2020	



State	State Resources	Date Issued	Summary
			Requests that insurance services remain open if and when a shelter-in-place order is issued.
	Press Release	03/23/2020	 Asks insurers to waive prior authorization for COVID-19 diagnostic tests and covered services. Asks insurers to speed access to certain drugs and to make expedited formulary exceptions if needed or if there is a shortage of a certain medication. Requests that insurers extend their preapproval time limits.
	Bulletin No. 20-B- 05 Press Release	03/12/2020	 Reminds insurers to ensure their telehealth programs are robust and will be able to meet any increased demand. Reminds insurers that they are not permitted to penalize an insured/subject an insured to the out-of-network benefit levels, unless contracting providers able to meet the needs of the insured are reasonably available to the insured without unreasonable delay. Requests insurers cover medically necessary diagnostic tests that are consistent with CDC guidelines related to COVID-19 at no cost to the insured. Requests that insurers make expedited formulary exceptions.
	Bulletin No. 20-B- 04	03/10/2020	• Following declaration of a state of emergency, authorizes extra prescriptions for requests made within 29 days of issuance of the bulletin.
North Dakota	Bulletin 2020-6	03/25/2020	• Encourages carriers to practice social distancing and to follow the CDC guidelines for businesses and employers during the COVID-19 pandemic.
	Bulletin 2020-2	03/23/2020	Provides guidance with respect to coverage of telehealth services.



State	State Resources	Date Issued	Summary
	Bulletin 2020-1 Press Release	03/11/2020	 Asks insurers to take the following immediate measures related to the potential impact of COVID-19: Waive any cost-sharing (i.e., co-pays, deductibles, and co-insurance) for CDC-recommended laboratory testing of COVID-19. Waive cost-sharing for an in-network provider office visit, urgent care center visit, or emergency room visit when testing for COVID-19 (note, permits waiving cost-sharing on a retrospective case-by-case basis upon confirmation of a COVID-19 diagnosis). Review and ensure their telehealth programs with participating providers are robust and will be able to meet any increased demand. In the event an immunization becomes available, immediately cover the immunization at no cost-sharing for all covered members. Make expedited formulary exceptions. Prevent surprise medical bills (i.e., encourages providers to use the insured's in-network laboratory facilities and requests out-of-network providers/facilities to accept the highest of the insurer's in-network reimbursement as full and final payment). Unless a travel insurance policy contains an exception applicable to COVID-19, note that a policy of travel insurance that covers the risks sickness, accident, or death incident to travel presumptively must cover such risks relating to COVID-19.
Ohio	Director's Order Press Release FAQs	03/22/2020	 Requires all individuals to stay at home, unless they are engaged in essential work or activity. Incorporates federal guidance with respect to classification as an essential business and includes financial and insurance institutions (e.g., insurance companies, underwriters, agents, brokers, and related insurance claims and agency services) as essential.
	Bulletin 2020-05	03/20/2020	Orders and directs that "emergency medical conditions" under Ohio law include testing and treatment related to COVID-19 and must be covered without preauthorization and at the same cost-sharing level as if provided in-network.
	Bulletin 2020-04	03/20/2020	Orders and directs insurers, TPAs, PBMs, etc. to suspend pharmacy audits during this state of emergency.



State	State Resources	Date Issued	Summary
	Bulletin 2020-03	03/20/2020	Directs insurers to comply with several requirements during the state of emergency, including giving their insureds the option of deferring premium payments coming due, interest free, for up to 60 calendar days from each original premium due date.
	Bulletin 2020-02 FAQs	03/11/2020	 Reminds insurers that, in certain instances, if the insurer does not have providers in its network to meet the testing/care needs associated with COVID-19, the insurer must provide access to out-of-network providers at in-network rates and emergency services must be covered at the same cost-sharing level as if provided in-network. Encourages insurers to implement early adoption of an Ohio law that would prohibit insurers from excluding coverage for a service that is otherwise covered under the plan solely because it is delivered as a telemedicine service. Requires insurers to provide access to a standard and expedited formulary exceptions process for non-formulary prescription drugs and encourages insurers to allow insureds to access prescription drug supplies beyond the typical limit even if the scheduled refill date has not yet been reached. Clarifies that unless a specific exclusion applies to COVID-19, a travel insurance policy that covers sickness, accident, disability, or death occurring during travel must cover such risks related to COVID-19.
Oklahoma	Special Notice	03/20/2020	Provides guidance regarding extended deadlines for license and class requirements.
	LH Bulletin 2020- 02 Press Release	03/17/2020	Asks insurers to take the following immediate measures related to COVID-19: Waive any cost-sharing for COVID-19 laboratory tests. Waive the cost-sharing for an in-network provider visit and an in-network urgent care center visit when testing for COVID-19. Ensure that their telehealth programs are robust and will be able to meet increased demand. Make expedited formulary exceptions. Extend the normal 30-day grace period for non-payment of premiums to 60 days.
	Press Release	03/10/2020	



State	State Resources	Date Issued	Summary
			Affirms that the major insurers have agreed that COVID-19 tests will be covered at no cost to patients, telemedicine related to the outbreak will be covered, and no surprise billing will occur in connection with COVID-19.
	Press Release	03/10/2020	Provides guidance with respect to coverage under travel insurance policies.
Oregon	Press Release	03/26/2020	Provides guidance to insurers regarding business interruption coverage.
	Emergency Order New Release	03/25/2020	 Requires insurance companies take the following steps immediately: Institute a grace period for premium payments on all insurance policies issued in the state. Suspend all cancellations and nonrenewals for active insurance policies Extend all deadlines for consumers to report claims and communicate about claims Provide consumers the ability to make premium payments and report claims while maintaining safe social distancing standards
	Guidance	03/24/2020	Provides guidance with respect to coverage of telehealth services.
	FAQs.	03/05/2020	 Details the contours of an agreement reached between the state and several insurers to waive cost-sharing payments (i.e., co-payments, co-insurance, and deductibles) for their customers who need COVID-19 testing. Addresses several other frequently asked questions (e.g., what if a consumer has Medicare insurance coverage, what to do about prescriptions, will insurance cover a consumer's hospital stay if admitted for COVID-19, etc.). Provides guidance with respect to coverage under travel insurance policies.
Pennsylvania	Press Release	03/24/2020	Reminds residents about the Special Enrollment Period.
	Executive Order Press Release Press Release	03/20/2020	Orders non-life sustaining businesses to close.



State	State Resources	Date Issued	Summary
	Industry Operation Guidance		Declares insurance carriers and agencies, brokerages, and other insurance-related activities as life-sustaining businesses, provided in-person sales/brokerage is prohibited.
	Notice 2020-06 Press Release	03/19/2020	Issues guidance on licensees regarding education courses and license renewals.
	Notice 2020-05	03/19/2020	Extends filing timeframes for rate, form, and advertisement filings.
	Notice 2020-04	03/19/2020	• Encourages regulated entities and individuals to consider several actions, including relaxing due dates for premiums payments, extending grace periods, waiving late fees and penalties, and allowing payment plans for premiums payments to otherwise avoid a lapse in coverage.
	Press Release	03/18/2020	Requests a Special Enrollment Period for uninsured or underinsured residents in response to COVID-19.
	Notice 2020-03	03/10/2020	 Urges insurers to waive any cost-sharing for COVID-19 laboratory tests and waive the cost-sharing for in-network provider office visits, in-network urgent care center visits, and emergency care services when testing for COVID-19. Urges insurers to assist insureds in accessing in-network or publicly-funded health services to avoid balance billing or surprise bills (where out-of-network services are provided, expects that insurers and providers will work together to avoid imposing costs on insureds). Encourages insurers to review their telehealth service provider arrangements, provide coverage costs related to telehealth services, and prepare to meet increased demand. Asks insurers to make expedited formulary exceptions. Encourages insurers to coordinate closely with the businesses they administer on behalf of employers who self-fund their health benefits to ensure consistency in access across all forms of coverage.
	FAQs Press Release Press Release	03/09/2020	 Explains that all major medical, ACA-compliant plans should cover medically appropriate COVID-19 diagnostic testing and associated treatment. Notes that the CDC and Pennsylvania Department of Health are currently performing tests without charge for COVID-19.



State	State Resources	Date Issued	Summary
			Reminds insurers to cover emergency services for an emergency medical condition at innetwork levels.
Rhode Island	Bulletin 2020-4	03/25/2020	 Requests that insurers do the following: Provide as much flexibility as possible to allow insureds to maintain their existing coverage by implementing and extending grace periods for premium payments, allowing payment plans for premium payments and instituting whatever other measures necessary to assist insureds in avoiding or delaying cancellation or a lapse of insurance coverage. Institute alternative methods of payment for those insureds whose normal method of payment is affected by this emergency like electronic payments. Institute additional flexibility in the form of waivers of late, insufficient funds and installment fees and penalties, extension of billing due dates and premium grace periods. Explore ways to streamline or delay the submission of administrative paperwork that may jeopardize the maintenance and/or issuance of coverage. Consider filings to alter policies to reflect the anticipated effects of the emergency Explore ways to make claims processes easier and more responsive such as electronic delivery of claims payments and remote adjustment of damages.
	Bulletin 2020-03	03/19/2020	Issues guidance on licensees regarding education courses and license renewals.
	Press Release	03/14/2020	 Updates telemedicine policies to include telephone-only services for primary care and behavioral health provider. Ensures testing and screening for COVID-19 can be done without prior authorization and without any cost to the patient. Covers prescription refills even if the prescription has yet to run out, provided that the prescription would remain valid beyond the refill date. In the event a federally-approved vaccine becomes available, ensures that the cost of the immunization is covered for all enrollees. Announces that the state is opening a Special Enrollment Period to allow residents to purchase coverage.
South Carolina	Bulletin No. 2020- 02	03/25/2020	Advises all insurers that they should work with citizens and businesses to provide relief in the by the following:



State	State Resources	Date Issued	Summary
			 Extend deadlines of premium payments. Give additional time before non-renewals or cancellations become effective. Extend proof of loss deadlines. Waive limitations relating to the use of out-of-network providers.
	Press Release	03/19/2020	 Provides guidance on the Family First Coronavirus Response Act. Notes that the FFCRA requires health insurance issuers to provide coverage (at no cost sharing or pre-authorization/ medical management requirements) for the testing and administration of FDA-approved COVID-19 tests.
	Press Release	03/12/2020	Identifies which insurers in the state are covering testing and screening services when ordered by a licensed health care provider.
South Dakota	Bulletin 20-02	03/25/2020	 Requires all insurers to cover COVID-19 testing and the associated office visit, urgent care, or emergency room visit at no cost to insureds. Urges insurers to allow early refills on maintenance prescription medication, without additional authorization requirements, where appropriate. Recommends that carriers allow access to out-of- network providers at in-network cost sharing if there is not an adequate number of in-network providers. Urges insurers to make reasonable accommodation for premium payments prior to cancellation and refrain from cancelling coverage for individuals that have been diagnosed with COVID-19. Urges health care providers to assist in consumer challenges by refraining from balance billing out-of-network insureds and to expand acceptance of insurance coverage by joining additional networks.
Tennessee	Bulletin 20-03	03/24/2020	 Requests that insurers work with policyholders who have concerns about their ability to timely pay their premiums to ensure that they can maintain their existing insurance coverage. Asks carriers to explore ways to eliminate late fees, non-sufficient funds fees, and installment fees. Asks carriers to explore ways to streamline administrative processes and paperwork to facilitate continuous coverage and ease burdens on policy holders.



State	State Resources	Date Issued	Summary
	Guidance	03/20/2020	Strongly encourages all entities to make filings electronically.
	Bulletin 20-02 Press Release	03/09/2020	 Requests insurers providing coverage in the state to take the following immediate measures: Waive any cost-sharing so that cost-sharing does not serve as a barrier to access. Waive the cost-sharing for an in-network provider office visit, an in-network urgent care center visit, and an emergency room visit associated with the administration of a test for COVID-19. In the event an immunization becomes available for COVID-19, immediately cover the immunization at no cost-sharing for all covered members. Make expedited formulary exceptions. If an insurer does not have a provider in its network with the appropriate training and experience to meet the particular health care needs of the insured, make exceptions to provide access to an out-of-network provider at the in-network cost sharing.
Texas	Bulletin B-0009-20	03/25/2020	Provides guidance to insurers regarding filing deadlines and fees.
	Bulletin B-0008-20 Press Release	03/24/2020	Suspends licensing requirements and fees for licensees.
	Bulletin B-0007-20	03/23/2020	 Encourages carriers to use grace periods for payments, temporary suspension of premium payments, payment plans, and other actions to allow continuing insurance coverage as appropriate. Notes that the Department will work with carriers to minimize the regulatory effects of an insurer's actions to provide policyholder relief, specifically for financial review requirements.
	Press Release	03/19/2020	Notes that the Texas Department of Insurance is coordinating with several state agencies on steps to help our state reduce the spread of COVID-19 and minimize potential regulatory burdens as insurers continue to serve their policyholders.
	Emergency Rule Press Release	03/18/2020	Provides guidance with respect to coverage of telehealth services.



State	State Resources	Date Issued	Summary
	FAQs Notice	03/06/2020	 Notes that the majority of the insurers and HMOs in the state are waiving consumer costs for medically-necessary testing for COVID-19 and some are offering telemedicine at no cost. Provides guidance with respect to coverage under travel insurance policies.
	Bulletin B-0005-20 Press Release	03/11/2020	 Strongly encourages insurers to waive consumer costs for testing, including: Waive copayments, coinsurance, and deductibles for COVID-19 testing that is consistent with guidance issued by the CDC. Waive consumer cost-sharing and facilitate expanded use of telemedicine. Cover necessary medical equipment, supplies, and services. Authorize payment to pharmacies for up to a 90-day supply of any prescription medication for individuals, regardless of when the prescription was filled.
Utah	Bulletin 2020-2	03/23/2020	Provides guidance to insurers regarding business interruption coverage.
	Guidance Press Release	03/19/2020	 Strongly urges insurers to expand coverage for COVID-19, including telehealth services. Provides guidance with respect to coverage of telehealth services.
	Bulletin 2020-1	03/17/2020	 Asks insurers to review and ensure their telehealth provider network is robust and can meet the increased demand. Encourages insurers to allow insureds to obtain one-time refills of prescription medication before a scheduled refill date. Requests that insurers accept out-of-network providers and facilities and hold harmless insureds who receive surprise bills for health care services related to testing and treatment of COVID-19.
	FAQs	03/11/2020	Clarifies which insurers in the state are covering needed diagnostic testing when ordered by a physician.
Vermont	Addendum 6 to Executive Order 01- 20 Press Release	03/25/2020	 Directs the closure of in-person operations for all non-essential businesses. Deems banks and related financial institutions to be essential.



State	State Resources	Date Issued	Summary
	Revised Bulletin No. 211	03/20/2020	Directs all insurers and pharmacy benefit managers to suspend all routine provider audits.
	Revised Bulletin No. 210	03/20/2020	Directs insurers to make at least a 30-day supply of medication available to members refilling their prescriptions
	Memo	03/19/2020	Provides guidance with respect to coverage of telehealth services.
	Bulletin No. 211	03/18/2020	Directs insurers to suspend all routine provider audits.
	Bulletin No. 210 Press Release	03/17/2020	Offers guidance to insurers on coverage of prescription drugs.
	Bulletin No. 209	03/06/2020	 Directs insurers to cover any medically necessary COVID-19 testing performed by the CDC, the Vermont Department of Health, or a laboratory approved thereby, with no co-payments, coinsurance, or deductible requirements for members Directs insurers to waive cost-sharing for in-network provider office visits, urgent care visits, and emergency services visits to test for COVID-19. Clarifies that if there are no in-network providers, out-of-network providers must be covered under Vermont law for testing.
Virginia	Executive Order No. 53 FAQs Press Release	03/23/2020	 Directs all non-essential retail businesses to close, excluding banks and other financial institutions with retail functions. Advises that other categories of business utilize teleworking as much as possible or adhere to social distancing recommendations.
	Notice	03/17/2020	Provides guidance regarding license and exam deadline extensions.
	Press Release	03/16/2020	



State	State Resources	Date Issued	Summary
			Directs regulated electric, natural gas and water companies to suspend service disconnections until the coronavirus outbreak subsides.
	Press Release	03/11/2020	Notes that most major health care insurers have waived all costs associate with testing and emergency treatment for COVID-19.
Washington	Emergency Order No. 20-03 Press Release	03/25/2020	 Requires insurers that sell property and casualty policies in our state to: Provide a grace period for policyholders to pay their insurance premiums. Waive fees related to any late payments, including late fees and reinstatement fees. Refrain from canceling any policy for nonpayment of premium, unless the policyholder requests the policy to be canceled.
	Amended Proclamation Press Release List of Essential Businesses	03/23/2020	 Requires residents cease leaving their home, except to conduct or participate in essential activities and/or for employment in essential business services. Mirrors federal guidance and identifies insurance services as part of the essential workforce.
	Emergency Order No. 20-02 Press Release	03/24/2020	 Provides guidance with respect to coverage of telehealth services. Orders the coverage of all medically-necessary diagnostic testing for flu and certain other viral respiratory illnesses billed during a provider visit for COVID-19 with no copay, coinsurance or deductible.
	Press Release	03/11/2020	Requests that labs be mindful of what they charge in relation to COVID-19 testing.
	Emergency Order No. 20-01 Press Release FAQs Blog	03/05/2020	 Orders all insurers offering coverage in the state during from March 5, 2020 – May 4, 2020 to: Cover, prior to application of any deductible and with no cost-sharing, the provider visit and FDA-authorized COVID-19 testing for enrollees who meet the CDC criteria for testing. Allow enrollees to obtain a one-time refill of their covered prescription medications prior to the expiration of the waiting period between refills so that enrollees can maintain an adequate supply of necessary medication. Ensure compliance with the state's balance billing protections.



State	State Resources	Date Issued	Summary
	Blog	02/21/2020	Provides guidance with respect to coverage under travel insurance policies.
West Virginia	Emergency Order 20-EO-04	03/23/2020	Orders that applicants for an emergency adjuster license must complete the emergency insurance adjuster licensing application
	Emergency Order 20-EO-03	03/23/2020	Provides guidance on workers compensation insurance.
	Executive Order 9- 20 Summary	03/23/2020	 Requires all individuals within the state to stay at home, unless performing an essential activity. Requires non-essential businesses and operations to temporarily cease operations. Classifies financial and insurance institutions (e.g., insurance companies, underwriters, agents, brokers, and related insurance claims and agency services) as essential.
	Emergency Order: 20-EO-02	03/18/2020	Insurers and other regulated entities must not issue a cancellation notice or nonrenewal notice pertaining to any insurance policy, plan or contract if the reason for cancellation or nonrenewal is a result of circumstances stemming from the COVID-19 pandemic
	Bulletin No. 20-06	03/17/2020	Provides guidance on temporary producer license accessibility.
	Emergency Order	03/13/2020	 Declares an insurance emergency in West Virginia and suspends normal time frames for claim handling and settlement. Orders that insurers and other regulated entities continue to adjust claims as expeditiously as possible during this insurance emergency and utilize all possible methods of adjusting claims remotely, all the while striving to meet normal time frames for the adjustment and resolution of claims whenever possible.
	Bulletin No. 20-05	03/13/2020	



State	State Resources	Date Issued	Summary
			 Requires insurers to cover an additional one-time early refill of any necessary prescriptions to ensure individuals have access to their necessary medications. Allows insurers to make formulary exceptions.
	Bulletin No. 20-04	03/13/2020	Requests assurance that all insurers having continuity of operations and preparedness plans to address any operational risks and that they are identifying, monitoring, and managing the financial risk posed by COVID-19.
	Bulletin No. 20-03	03/13/2020	Requests that insurers immediately review their telehealth or telemedicine services.
	Bulletin No. 20-01	03/09/2020	 Asks insurers to take the following immediate measures: Waive any cost-sharing for COVID-19 laboratory tests and waive cost-sharing for an innetwork provider office visit, in-network urgent care center visit, and emergency room visit when testing for COVID-19. Review and ensure their telehealth programs with participating providers are robust and will be able to meet any increased demand. In the event an immunization becomes available, cover the immunization at no cost-sharing for all covered members. Make expedited formulary exceptions. Prevent balance bills (i.e., if an insurer does not have a health care provider in its network with the appropriate training and experience to meet the particular health care needs of an insured, make exceptions to provide access to out-of-network providers at in-network cost-sharing).
Wisconsin	Emergency Order 12 Press Release	03/24/2020	 Permits individuals to leave their residences to provide any services or perform any work that is essential. Deems financial institutions and services, including licensed financial service providers, insurance services, and others, to be essential.
	Bulletin Press Release	03/23/2020	Orders insurers to assist restaurants who have begun offering delivery service to customers during the COVID-19 public health crisis.



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	Bulletin	03/20/2020	Encourages insurers to offer flexibility to insureds who are incurring economic hardship, including offering non-cancellation periods, deferred premium payments, premium holidays and acceleration or waiver of underwriting requirements.
	Bulletin	03/19/2020	Provides guidance regarding temporary changes to requirements for delivering online courses and online course proctoring.
	Bulletin Press Release	03/15/2020	Provides guidance to insurers regarding managing corporate governance issues and filing deadlines.
	Bulletin Press Release	03/06/2020	 Requests insurers to take the following immediate measures: Waive any cost-sharing for COVID-19 laboratory and radiology testing and waive cost-sharing for a provider office visit, urgent care center visit, and emergency room visit when the basis for the visit is related to testing for COVID-19. Review and ensure their telehealth programs with participating providers are robust and will be able to meet any increased demand. In the event an immunization becomes available, immediately cover the immunization at no cost-sharing for all covered members. Make expedited formulary exceptions. Be flexible on prescription drug supply limitations and early refill limitations (i.e., allow insureds to fill and refill prescription medications for up to a 90-day supply or until the prescription expires). Prevent balance bills (i.e., if an insurer does not have a health care provider in its network with the appropriate training and experience to meet the particular health care needs of an insured, make exceptions to provide access to out-of-network providers at in-network cost-sharing).
Wyoming	Notice	03/23/2020	Provides guidance regarding temporary changes to requirements for licenses, fees and electronic signatures.



State	State Resources	Date Issued	Summary
	Bulletin 20-01	03/11/2020	 Advises insurers to waive any cost-sharing for laboratory diagnostic testing for respiratory syncytial virus, influenza, respiratory panel test, and COVID-19. Asks insurers to waive thee cost-sharing for an office visit, urgent care center visit, or emergency room visit (note, this waiver is applicable to in-network and out-of-network providers, facilities, and laboratories). Encourages insurers to use telehealth services instead of in-person health care services and liberalize telehealth benefits.