

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:**

- [Connecticut](#) issued a Notice detailing the recent IRS guidance on COVID-19 related employee medical leave and new payroll tax credits.
- [Georgia](#) issued a Bulletin encouraging all counties and municipalities to consider insurance services as “essential business services” in any orders for non-essential businesses to close.
- [Hawaii](#) issued a Third Supplemental Proclamation restricting the operations of non-essential businesses.
- [Louisiana](#) issued an Emergency Rule providing guidance with respect to coverage of telehealth services.
- [Maine](#) issued an Executive Order restricting the operations of non-essential businesses.
- [Maryland](#) issued a Bulletin encouraging licensees to utilize remote claim handling technologies to the greatest extent possible.
- [Mississippi](#) issued a Bulletin encouraging insurers to allow adjustments to rating bases to more accurately reflect annual exposure projections.
- [Missouri](#) issued a Bulletin encouraging insurers to issue a grace period that would prevent cancellations, nonrenewals, or terminations of coverage.
- [Nebraska](#) issued a Notice extending the license deadline by 90 days, upon request.
- [Nevada](#) issued a set of Frequently Asked Questions providing guidance with respect to coverage under travel insurance policies.
- [New Hampshire](#) issued a Bulletin requesting that all insurers work to leverage virtual audits.
- [New Mexico](#) issued an Executive Order restricting the operations of non-essential businesses.
- [North Carolina](#) issued a Press Release asking insurers to waive prior authorization for COVID-19 diagnostic tests and covered services, among other things.
- [South Carolina](#) issued a Press Release providing guidance on the Family First Coronavirus Response Act.
- [Virginia](#) issued an Executive Order restricting the operations of non-essential retail businesses.
- [Wisconsin](#) issued an Emergency Order restricting the operations of non-essential businesses.

* Most notably, a brief overview chart is provided below with respect to the recent stay-at-home orders in California, Connecticut, Delaware, **Hawaii**, Illinois, Indiana, Kentucky, Louisiana, **Maine**, Maryland, Massachusetts, Michigan, New Jersey, **New Mexico**, New York, Ohio, Pennsylvania, **Virginia**, 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	NO		
Connecticut	YES	YES	YES
Delaware	YES	NO	YES
D.C.	NO		
Florida	NO		
Georgia	NO		
Hawaii	YES	YES	YES
Idaho	NO		
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	NO	YES	YES
Maryland	YES	YES	YES
Massachusetts	YES	YES	YES
Michigan	YES	YES	YES
Minnesota	NO		
Mississippi	NO		
Missouri	NO		
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		
North Dakota	NO		
Ohio	YES	YES	YES
Oklahoma	NO		
Oregon	NO		
Pennsylvania	YES	YES	YES
Rhode Island	NO		

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	NO		
Virginia	YES* (RETAIL-SPECIFIC)	NO	YES* (RETAIL-SPECIFIC)
Washington	NO		
West Virginia	YES	YES	YES
Wisconsin	YES	YES	YES
Wyoming	NO		

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State	State Resources	Date Issued	Summary
Alabama	Consumer Notice	03/18/2020	<ul style="list-style-type: none"> • Assures consumers that ALDOI is closely monitoring insurance issues related to COVID-19.
	FAQs	03/17/2020	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.
	Bulletin 2020-02 Press Release	03/13/2020	<ul style="list-style-type: none"> • Asks insurers to: <ul style="list-style-type: none"> – Waive any cost-sharing for COVID-19 laboratory tests and the cost-sharing for an in-network 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	B20-10	03/20/2020	<ul style="list-style-type: none"> • 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 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	<ul style="list-style-type: none"> • 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.

State	State Resources	Date Issued	Summary
	Regulatory Order No. R20.02	03/18/2020	<ul style="list-style-type: none"> • Extends filing timeframes for required for external healthcare reviews.
	B20-08	03/18/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage of telehealth services.
	B20-06	03/16/2020	<ul style="list-style-type: none"> • Extends filing timeframes for rate, form, and advertisement filings.
	FAQs	03/16/2020	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.
	B20-03	03/03/2020	<ul style="list-style-type: none"> • Expects insurers to: <ul style="list-style-type: none"> – 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.
Arizona	Press Release	03/13/2020	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.
	Executive Order 2020-07 Press Release	03/11/2020	<ul style="list-style-type: none"> • Requires all insurers regulated by the state to: <ul style="list-style-type: none"> – 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.

State	State Resources	Date Issued	Summary
			<ul style="list-style-type: none"> – Cover telemedicine visits at a lower cost-sharing point for consumers than the same in-office service to encourage utilization of telemedicine for the duration of the state’s public health emergency.
Arkansas	Bulletin No. 6-2020	03/20/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage of telehealth services.
California	Press Release	03/20/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Urges uninsured residents and those that have lost their coverage to purchase coverage through Covered California—or through other health plans/insurers offering coverage outside the exchange—during a Special Enrollment Period.
	Notice	03/18/2020	<ul style="list-style-type: none"> • 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.”

State	State Resources	Date Issued	Summary
			<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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.
	Bulletin Press Release Screening Letter	03/05/2020	<ul style="list-style-type: none"> • Directs insurers providing <u>commercial health insurance</u> 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	Emergency Regulation 20-E-02 Press Release Consumer Advisory	03/19/2020	<ul style="list-style-type: none"> • Establishes a Special Enrollment Period for uninsured residents to get coverage from March 20, 2020 through April 3, 2020.
	Emergency Regulation	03/17/2020	<ul style="list-style-type: none"> • 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.

State	State Resources	Date Issued	Summary
			<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Directs insurers to: <ul style="list-style-type: none"> – 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). – 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.
<i>Connecticut</i>	Notice	<i>02/23/2020</i>	<ul style="list-style-type: none"> • <i>Details the recent IRS guidance on COVID-19-related employee medical leave and new payroll tax credits.</i>
	Executive Order 7H Press Release	03/20/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance to insurers regarding managing corporate governance issues and business interruption coverage.
	Bulletin IC-39	03/09/2020	<ul style="list-style-type: none"> • Encourages insurers/health care centers to: <ul style="list-style-type: none"> – 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.

State	State Resources	Date Issued	Summary
			<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Instructs travel insurers to accommodate travel cancellation requests under the terms of travel insurance policies “taking into account the seriousness of the circumstances.”
Delaware	Fourth Modification of the Declaration of a State of Emergency FAQs List of Essential Businesses	03/22/2020	<ul style="list-style-type: none"> • Deems insurance carriers, agencies, brokerages, and other insurance-related activities to be essential businesses.
	Bulletin No. 116 Press Release	03/20/2020	<ul style="list-style-type: none"> • 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. • 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.

State	State Resources	Date Issued	Summary
	Bulletin No. 115 Press Release	03/09/2020	<ul style="list-style-type: none"> • 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.
D.C.			
Florida	CFO Statement on Travel Insurance CFO Letter to Travel Insurance Agents and Insurers	03/16/2020	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.
	OIR-20-03M	03/16/2020	<ul style="list-style-type: none"> • 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.
	OIR-20-01M Executive Order 20-51	03/06/2020	<ul style="list-style-type: none"> • 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.).
	OIR Informational Memorandum 20-02M	03/10/2020	<ul style="list-style-type: none"> • 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.

State	State Resources	Date Issued	Summary
<i>Georgia</i>	Press Release Bulletin 20-EX-4	03/24/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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.
	Directive 20-EX-3 Press Release	03/09/2020	<ul style="list-style-type: none"> • Asks insurers to take the following immediate measures related to the potential impact of COVID-19: <ul style="list-style-type: none"> – 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.
<i>Hawaii</i>	Third Supplementary Proclamation Press Release	03/23/2020	<ul style="list-style-type: none"> • 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.

State	State Resources	Date Issued	Summary
	Commissioner's Memorandum 2020-2 Press Release	03/19/2020	<ul style="list-style-type: none"> • Notes that licensees will be extended past the April 16 date until examinations are made available.
	Commissioner's Memorandum 2020-1	03/18/2020	<ul style="list-style-type: none"> • Extends filing timeframes for rate, form, and advertisement filings.
	Consumer Alert	03/12/2020	<ul style="list-style-type: none"> • Warns consumers against price gouging and scams. • Provides guidance with respect to coverage under travel insurance policies.
Idaho	Press Release	03/09/2020	<ul style="list-style-type: none"> • Notes that insurers are voluntarily waiving cost-sharing for COVID-19 testing. • Requests that, if a case ends up out-of-network, providers refrain from balance billing.
Illinois	Executive Order 2020-10	03/20/2020	<ul style="list-style-type: none"> • 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, <u>related financial institutions, and institutions selling financial products</u>).
	Company Bulletin 2020-02	03/02/2020	<ul style="list-style-type: none"> • 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.

State	State Resources	Date Issued	Summary
			<ul style="list-style-type: none"> • 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	Executive Order 20-08 FAQs Press Release	03/23/2020	<ul style="list-style-type: none"> • 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.
	Executive Order 20-05 Press Release	03/19/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Encourages license applicants, licensees and course providers to utilize online licensing services and avoid paper processes when possible.
	FAQs	03/17/2020	<ul style="list-style-type: none"> • Notes that most of the major insurers have committed to waive cost-sharing for COVID-19 testing.
Iowa	Bulletin 20-04	03/19/2020	<ul style="list-style-type: none"> • Requests that all health insurers and HMOs: <ul style="list-style-type: none"> – 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 COVID-19 to request extensions for premium payments beyond the insurers' normal payment due dates.

State	State Resources	Date Issued	Summary
	Bulletin 20-03	03/17/2020	<ul style="list-style-type: none"> • Requests that while insurers implement business contingency plans that they reach out to the Department for any assistance needed.
	FAQs	03/13/2020	<ul style="list-style-type: none"> • 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.
Kansas	FAQs	03/18/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	Executive Order	03/23/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Requires insurers to: <ul style="list-style-type: none"> – Waive all cost-sharing (i.e., copayments, coinsurance, and deductibles) for screening and testing for COVID-19, including hospital, emergency department, urgent care,

State	State Resources	Date Issued	Summary
			<p>provider office visits, lab testing, telehealth, and any immunizations that are made available.</p> <ul style="list-style-type: none"> 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.
<i>Louisiana</i>	Emergency Rule 37	<i>03/23/2020</i>	<ul style="list-style-type: none"> Provides guidance with respect to coverage of telehealth services.
	Proclamation No. JBE-2020-33 Fact Sheet	03/22/2020	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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.
<i>Maine</i>	Executive Order Press Release	<i>03/24/2020</i>	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Issues guidance regarding remote delivery of health services.
	Supplemental Order	03/19/2020	<ul style="list-style-type: none"> Issues guidance regarding credentialing.

State	State Resources	Date Issued	Summary
	Bulletin 442 Consumer Guide to Insurance Provisions and Resources in Maine	03/12/2020	<ul style="list-style-type: none"> • Directs insurers 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.
<i>Maryland</i>	Bulletin No. 20-11	<i>02/23/2020</i>	<ul style="list-style-type: none"> • <i>Encourages licensees to utilize remote claim handling technologies to the greatest extent possible.</i> • <i>Notes that prompt payment of known claim obligations should be a top priority.</i>
	Interpretive Guidance	03/23/2020	<ul style="list-style-type: none"> • Enumerates the essential businesses that may remain open, including the financial services sector, including insurance companies.
	Bulletin 20-10 Press Release	03/20/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.
	FAQs	03/19/2020	<ul style="list-style-type: none"> • Provides an overview of the impact COVID-19 will have on product licensing capabilities.

State	State Resources	Date Issued	Summary
	Advisory	03/18/2020	<ul style="list-style-type: none"> • Offers an overview of Business Interruption Coverage.
	Press Release	03/16/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Requires insurers to waive any cost-sharing (i.e., co-payments, coinsurance, and deductibles): <ul style="list-style-type: none"> – 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	Executive Order Press Release COVID-19 Essential Services	03/23/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Requests that insurers do the following: <ul style="list-style-type: none"> – 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
			<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage of telehealth services.
	Bulletin 2020-03	03/12/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.
	Bulletin 2020-02	03/06/2020	<ul style="list-style-type: none"> • Expects insurers to: <ul style="list-style-type: none"> - 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 <u>and</u> 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	<ul style="list-style-type: none"> • 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 <u>workers in the insurance industry, but only to the extent that their work cannot be done by telephone or remotely.</u>

State	State Resources	Date Issued	Summary
	Bulletin 2020-08-INS	03/20/2020	<ul style="list-style-type: none"> • Provides guidance to insurers regarding managing corporate governance issues and filing deadlines.
	Survey Request	03/19/2020	<ul style="list-style-type: none"> • Requests feedback on responses to COVID-19 from all Michigan consumer finance licensees and registrants by March 20, 2020.
	Press Release	03/12/2020	<ul style="list-style-type: none"> • 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	Consumer Alert FAQs	03/19/2020	<ul style="list-style-type: none"> • Provides guidance to insurers regarding managing corporate governance issues and business interruption coverage.
	Letter	03/13/2020	<ul style="list-style-type: none"> • 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.
	Press Release	03/13/2020	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.
<i>Mississippi</i>	Bulletin 2020-02	<i>03/23/2020</i>	<ul style="list-style-type: none"> • <i>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.</i>

State	State Resources	Date Issued	Summary
	Bulletin 2020-01	03/16/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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.
<i>Missouri</i>	Bulletin 20-05 Press Release	<i>03/21/2020</i>	<ul style="list-style-type: none"> • Strongly encourages insurers to: <ul style="list-style-type: none"> – <i>To issue a grace period that would prevent cancellations, nonrenewal, or termination coverages.</i> – <i>To extend a grace period of at least 60 days for coverage where premium or subscription charges are unpaid.</i>
	Bulletin 20-04	03/04/2020	<ul style="list-style-type: none"> • Provides guidance to insurers regarding managing corporate governance issues and filing deadlines.
	Bulletin 20-03	03/03/2020	<ul style="list-style-type: none"> • Asks insurers providing coverage in the state to take the following immediate measures: <ul style="list-style-type: none"> – 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage of telehealth services.

State	State Resources	Date Issued	Summary
	Press Release Press Release	03/18/2020	<ul style="list-style-type: none"> • Reminds consumers of year-round options for immediate health coverage. • Notes that insurance companies voluntarily assisting in virus response.
	Press Release	03/11/2020	<ul style="list-style-type: none"> • Notes that the four major insurers in the state are voluntarily waiving customer costs (e.g., copays and deductibles) for COVID-19 testing.
<i>Nebraska</i>	Notice	<i>03/23/2020</i>	<ul style="list-style-type: none"> • <i>Extends license deadline by 90 days, upon request.</i>
	Notice	03/19/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.
	Consumer Alert	03/11/2020	<ul style="list-style-type: none"> • Offers updates from insurers operating in the state regarding their policies addressing COVID-19.
<i>Nevada</i>	FAQs	<i>03/20/2020</i>	<ul style="list-style-type: none"> • <i>Provides guidance with respect to coverage under travel insurance policies.</i>
	Emergency Regulation Press Release Consumer Alert Press Release FAQs	03/05/2020	<ul style="list-style-type: none"> • Prohibits insurers from: <ul style="list-style-type: none"> – 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.
<i>New Hampshire</i>	Bulletin No. 20-019-AB	<i>03/23/2020</i>	<ul style="list-style-type: none"> • <i>Requests that all insurers work to leverage virtual audits for the completion of any audits.</i>

State	State Resources	Date Issued	Summary
			<ul style="list-style-type: none"> • Notes that if an insurer is unable to complete audits within the 120-day time limit than document accordingly.
	FAQs	03/19/2020	<ul style="list-style-type: none"> • Provides guidance regarding insureds who recently lost employer-sponsored health insurance.
	FAQs	03/17/2020	<ul style="list-style-type: none"> • Provides guidance to insurers regarding managing corporate governance issues and business interruption coverage.
	Press Release FAQs	03/10/2020	<ul style="list-style-type: none"> • 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. 20-07	03/22/2020	<ul style="list-style-type: none"> • Provides guidance with respect to coverage of telehealth services.
	Executive Order No. 7 Press Release Blog Post	03/21/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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

State	State Resources	Date Issued	Summary
			automobile inspections or undergo medical exams, and exercise judicious efforts to assist affected policyholders.
	Bulletin No. 20-03	03/10/2020	<ul style="list-style-type: none"> • Advises insurers to: <ul style="list-style-type: none"> – 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).
<i>New Mexico</i>	Public Health Order Press Release	<i>03/23/2020</i>	<ul style="list-style-type: none"> • <i>Requires all businesses—except essential businesses—to reduce their in-person workforce at each business by 100%.</i> • <i>Designates banks, credit unions, insurance providers, payroll services, brokerage services, and investment management firms as essential.</i>
	Bulletin 2020-006	03/20/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage of telehealth services.

State	State Resources	Date Issued	Summary
	Press Release	03/13/2020	<ul style="list-style-type: none"> • 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.
	Bulletin 2020-004	03/06/2020	<ul style="list-style-type: none"> • 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	Executive Order No. 202.8 Guidance	03/20/2020	<ul style="list-style-type: none"> • Closes all non-essential businesses in the state. • Classifies financial institutions, including insurance, as essential.
	Insurance Circular Letter No. 8 Press Release	03/20/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Closes all non-essential businesses in the state. • Clarifies that financial institutions, including insurance, are essential businesses.
	Insurance Circular Letter No. 7	03/19/2020	<ul style="list-style-type: none"> • Urges all regulated entities to alleviate the adverse impacts caused by COVID-19 on consumers and small businesses by: <ul style="list-style-type: none"> – 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;

State	State Resources	Date Issued	Summary
			<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Requires insurers to waive cost-sharing (e.g., deductibles, copayments, or coinsurance) for in-network telehealth visits regardless of if they are related to COVID-19.
	Press Release	03/16/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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.

State	State Resources	Date Issued	Summary
	Insurance Circular Letter No. 3 Press Release	03/03/2020	<ul style="list-style-type: none"> • Advises insurers that they should waive any cost sharing for: <ul style="list-style-type: none"> – 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	03/23/2020	<ul style="list-style-type: none"> • <i>Asks insurers to waive prior authorization for COVID-19 diagnostic tests and covered services.</i> • <i>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.</i> • <i>Requests that insurers extend their preapproval time limits.</i>
	Bulletin No. 20-B-05 Press Release	03/12/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Following declaration of a state of emergency, authorizes extra prescriptions for requests made within 29 days of issuance of the bulletin.

State	State Resources	Date Issued	Summary
North Dakota	Bulletin 2020-1 Press Release	03/11/2020	<ul style="list-style-type: none"> • Asks insurers to take the following immediate measures related to the potential impact of COVID-19: <ul style="list-style-type: none"> – 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, <u>permits</u> 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., <u>encourages</u> providers to use the insured’s in-network laboratory facilities and <u>requests</u> 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	<ul style="list-style-type: none"> • 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 <u>and</u> 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	LH Bulletin 2020-02	03/17/2020	<ul style="list-style-type: none"> • Asks insurers to take the following immediate measures related to COVID-19: <ul style="list-style-type: none"> – 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.
	Press Release	03/10/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.

State	State Resources	Date Issued	Summary
Oregon	FAQs	03/05/2020	<ul style="list-style-type: none"> • 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	Executive Order Press Release Press Release Industry Operation Guidance	03/20/2020	<ul style="list-style-type: none"> • Orders non-life sustaining businesses to close. • 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	<ul style="list-style-type: none"> • Issues guidance on licensees regarding education courses and license renewals.
	Notice 2020-05	03/19/2020	<ul style="list-style-type: none"> • Extends filing timeframes for rate, form, and advertisement filings.
	Notice 2020-04	03/19/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Requests a Special Enrollment Period for uninsured or underinsured residents in response to COVID-19.
	Notice 2020-03	03/10/2020	<ul style="list-style-type: none"> • 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).

State	State Resources	Date Issued	Summary
			<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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. • Reminds insurers to cover emergency services for an emergency medical condition at in-network levels.
Rhode Island	Bulletin 2020-03	03/19/2020	<ul style="list-style-type: none"> • Issues guidance on licensees regarding education courses and license renewals.
	Press Release	03/14/2020	<ul style="list-style-type: none"> • 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.
<i>South Carolina</i>	Press Release	<i>03/19/2020</i>	<ul style="list-style-type: none"> • <i>Provides guidance on the Family First Coronavirus Response Act.</i> • <i>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.</i>

State	State Resources	Date Issued	Summary
	Press Release	03/12/2020	<ul style="list-style-type: none"> • Identifies which insurers in the state are covering testing and screening services when ordered by a licensed health care provider.
South Dakota			
Tennessee	Guidance	03/20/2020	<ul style="list-style-type: none"> • Strongly encourages all entities to make filings electronically.
	Bulletin 20-02 Press Release	03/09/2020	<ul style="list-style-type: none"> • Requests insurers providing coverage in the state to take the following immediate measures: <ul style="list-style-type: none"> – 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-0007-20	03/23/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance with respect to coverage of telehealth services.

State	State Resources	Date Issued	Summary
	FAQs Notice	03/06/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Strongly encourages insurers to waive consumer costs for testing, including: <ul style="list-style-type: none"> – 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	Guidance Press Release	03/19/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Clarifies which insurers in the state are covering needed diagnostic testing when ordered by a physician.
Vermont	Revised Bulletin No. 211	03/20/2020	<ul style="list-style-type: none"> • Directs all insurers and pharmacy benefit managers to suspend all routine provider audits.
	Revised Bulletin No. 210	03/20/2020	<ul style="list-style-type: none"> • Directs insurers to make at least a 30-day supply of medication available to members refilling their prescriptions

State	State Resources	Date Issued	Summary
	Memo	03/19/2020	<ul style="list-style-type: none"> • Provides guidance with respect to coverage of telehealth services.
	Bulletin No. 211	03/18/2020	<ul style="list-style-type: none"> • Directs insurers to suspend all routine provider audits.
	Bulletin No. 210 Press Release	03/17/2020	<ul style="list-style-type: none"> • Offers guidance to insurers on coverage of prescription drugs.
	Bulletin No. 209	03/06/2020	<ul style="list-style-type: none"> • 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.
<i>Virginia</i>	Executive Order No. 53 FAQs Press Release	<i>03/23/2020</i>	<ul style="list-style-type: none"> • <i>Directs all non-essential retail businesses to close, excluding banks and other financial institutions with retail functions.</i> • <i>Advises that other categories of business utilize teleworking as much as possible or adhere to social distancing recommendations.</i>
	Press Release	03/16/2020	<ul style="list-style-type: none"> • Directs regulated electric, natural gas and water companies to suspend service disconnections until the coronavirus outbreak subsides.
	Press Release	03/11/2020	<ul style="list-style-type: none"> • Notes that most major health care insurers have waived all costs associate with testing and emergency treatment for COVID-19.
Washington	Press Release	03/11/2020	<ul style="list-style-type: none"> • Requests that labs be mindful of what they charge in relation to COVID-19 testing.
	Emergency Order No. 20-01 Press	03/05/2020	<ul style="list-style-type: none"> • Orders all insurers offering coverage in the state during from March 5, 2020 – May 4, 2020 to:

State	State Resources	Date Issued	Summary
	Release FAQs Blog		<ul style="list-style-type: none"> – 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.
	Blog	02/21/2020	<ul style="list-style-type: none"> • Provides guidance with respect to coverage under travel insurance policies.
West Virginia	Emergency Order 20-EO-04	03/23/2020	<ul style="list-style-type: none"> • Orders that applicants for an emergency adjuster license must complete the emergency insurance adjuster licensing application
	Emergency Order 20-EO-03	03/23/2020	<ul style="list-style-type: none"> • Provides guidance on workers compensation insurance.
	Executive Order 9-20 Summary	03/23/2020	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Provides guidance on temporary producer license accessibility.
	Emergency Order	03/13/2020	<ul style="list-style-type: none"> • 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

State	State Resources	Date Issued	Summary
			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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Requests that insurers immediately review their telehealth or telemedicine services.
	Bulletin No. 20-01	03/09/2020	<ul style="list-style-type: none"> • Asks insurers to take the following immediate measures: <ul style="list-style-type: none"> – Waive any cost-sharing for COVID-19 laboratory tests and waive cost-sharing for an in-network 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).
<i>Wisconsin</i>	Emergency Order 12 Press Release	<i>03/24/2020</i>	<ul style="list-style-type: none"> • <i>Permits individuals to leave their residences to provide any services or perform any work that is essential.</i> • <i>Deems financial institutions and services, including licensed financial service providers, insurance services, and others, to be essential.</i>

State	State Resources	Date Issued	Summary
	Bulletin	03/20/2020	<ul style="list-style-type: none"> • 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 Press Release	03/15/2020	<ul style="list-style-type: none"> • Provides guidance to insurers regarding managing corporate governance issues and filing deadlines.
	Bulletin Press Release	03/06/2020	<ul style="list-style-type: none"> • Requests insurers to take the following immediate measures: <ul style="list-style-type: none"> – 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	Bulletin 20-01	03/11/2020	<ul style="list-style-type: none"> • 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 the 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.