

Survey of State Insurance Department COVID-19 Regulatory Actions

The Insurance Regulatory Practice Group at Mitchell Williams stands committed to providing current and relevant updates that affect the insurance industry as this COVID-19 pandemic evolves. Consistent with that commitment, we are actively monitoring all state action in this area. To keep our clients informed, we created a resource to track all new developments. The chart below provides a short summary of every state action to-date, along with a hyperlink to the underlying authority. We will update and redistribute this chart twice a week for the foreseeable future, highlighting new material as it becomes available. We are in the process of developing additional tools to assist our clients as the regulatory landscape continues to change in response to this pandemic.

For more information please contact: Rachael Padgett rpadgett@mwlaw.com; Zach Steadman zsteadman@mwlaw.com; Brian Pipkin bpipkin@mwlaw.com; Lana Freeman lfreeman@mwlaw.com; Brytne Kitchin bkitchin@mwlaw.com.

State	Date Issued	Summary	Applicability	Link
AK	3-3-2020	Department expects health insurers to provide for early refills or replacements of lost or damaged medications while the potential for quarantine related to COVID-19 is high. Also addresses expectations for claims handling and utilization review procedures as well as increases in member communication.	Health	Alaska Bulletin 20-03
AK	3-6-2020	Requires health insurers to waive cost-sharing for medically-necessary lab diagnostic testing for RSV, flu, respiratory panel tests, and COVID-19. Asks health insurers to waive cost-sharing for	Health	Alaska Bulletin 20-04

AK	3-20-2020	<p>office and urgent care visits for such testing for both in-network and out-of-network providers, facilities, and labs. Encourages health insurers to "liberalize" telehealth benefits during this time.</p> <p><u>Modified</u> by Bulletin 20-09, which states that respiratory panel tests are <u>no longer</u> subject to the zero cost-sharing requirement. Further provides that HDHPs will not lose that status merely because they cover cost of testing for COVID-19.</p>		<p>Alaska Bulletin 20-09 (modifies Alaska Bulletin 20-04)</p>
AK	3-16-2020	<p>Extends review period for rate, form, and advertisement filings. Insurers will be allowed an additional 15 days to respond to objection letters regarding prior approval forms. File and use form filings will automatically receive a 30-day extension. Prior approval rates will be allowed an additional 15 days to respond to an objection letter. File and use rates will be given a 15-day extension under AS 21.39.220, 21.51.405, and 21.54.015; and a 30-day extension under AS 21.57.080 with the waiting period automatically extended to 60 days. The division is reserving the right to treat File and Use filings as Prior Approval if deemed necessary.</p>	All Insurers	<p>Alaska Bulletin 20-06</p>
AK	3-17-2020	<p>Recognizes changes made by Alaska Insurance Law AS 21.42.322, signed into law March 16, 2020, and expands telehealth coverage to all covered services of health care insurance plans in the individual market. A prior in person visit must not be required. Insurers are required to implement immediately, review their insurance contracts, and make any necessary form filings to implement those changes by May 17, 2020 or as soon as practicable.</p>	Health	<p>Alaska Bulletin 20-07</p>

AK	3-18-2020	Prohibits carriers from terminating insurance contracts due to non-payment. Encourages carriers to work with policyholders in the collection of premiums and to waive all late fees. Effective through June 1, 2020.	All Insurers	Alaska Bulletin 20-08
AK	3-18-2020	Extends deadlines for external healthcare reviews. Insurers required to make "reasonable efforts" to meet the deadlines. Expedited reviews must be processed to completion in no more than "5 working days." Experimental and investigational healthcare reviews are extended to a 30-day deadline. If there will be significant delays in meeting deadlines, the insurer should inform the Department.	Health	Reg. Order No. R20-02
AL	3-13-2020	Guidance to health insurance carriers aimed at removing barriers to testing and treatment for COVID-19. DOI requests health insurers to waive cost-sharing for COVID-19 lab tests.	Health	Alabama Bulletin 2020-02
AR	3-20-2020	Directs all insurers and regulated entities to provide the Commissioner with the email address the company has designated to field consumer contacts during the health emergency. Insurers and other regulated industries must continue to adjust claims as expeditiously as possible in compliance with the provisions of AID Rule 43, and utilize all possible methods of adjusting claims remotely while striving to meet normal time frames whenever possible. Places a 60-day moratorium on the cancellation/non-renewal of insurance policies for the nonpayment of premiums, but only for Arkansans diagnosed with/positively tested for COVID-19. The extension is not automatic; affected policyholders must request the	All Insurers	Arkansas Bulletin No. 6-2020

		extension from their carrier. The moratorium is not a waiver, it is just a grace period.		
AZ	3-11-2020	Instructs DHS and DOI to require that all insurers regulated by the State cover COVID-19 diagnostic testing from all qualified labs, whether in-network or out-of-network; waive all cost-sharing requirements for consumers related to COVID-19 diagnostic testing; and cover telemedicine visits at a lower cost-sharing point than the same in-office service to encourage use of telemedicine for duration of public health emergency.	Health	Arizona Executive Order 2020-07
CA	3-4-2020	Permits state entities to share relevant medical information, limited to the patient's underlying health conditions, age, current condition, date of exposure, and possible contact tracing, as necessary to address the effect of the COVID-19 outbreak with state, local, federal, and nongovernmental partners, with such information to be used for the limited purposes of monitoring, investigation and control, and treatment and coordination of care.	Health (Potentially)	Emergency Proclamation
CA	3-5-2020	Directs all health insurers to immediately reduce cost-sharing to zero for all medically-necessary treatment and screening for COVID-19 and provides guidelines for communication of cost-sharing waiver to providers and the public. Encourages health insurers to work with contracted providers to use telehealth services.	Health	California COVID-19 Screening and Testing Bulletin

CA	3-18-2020	Requires insurance companies to provide insureds with a minimum 60-day grace period to pay insurance premiums so that policies are not cancelled for nonpayment of premiums. All insurance agents, brokers, and other licensees who accept premium payments on behalf of insurers are requested to take steps to ensure customers have the ability to make prompt insurance payments.	All Insurers	California Notice
CA	3-18-2020	Requires health insurers to submit a notification describing how the insurer is communicating with potentially impacted insureds, and summarizing the actions the insurer has taken (or is in the process of taking) to ensure that the health care needs of insureds are met. The notification must include information demonstrating insureds have access to medically necessary health care during the outbreak, including: (1) policies concerning suspending prescription fill or refill limitations, waiving charges for home delivery, and other means of removing barriers to prescription drug access; (2) how the insurer is complying with the March 5 Bulletin regarding screening and testing; (3) how the insurer is providing displaced insureds with access to medically necessary health services; (4) the insurer's plan to maximize the use of telehealth services including waiving or expediting any network provider credentialing, certification, or pre-authorization requirements; (5) the insurer's plans for communicating with insureds regarding care options during this time; and (6) the insurer's contingency plan for minimizing disruption in member operations and	Health	California Notice

		continuing essential business operations for areas subject to shelter-in-place orders.		
CA	3-18-2020	Encourages insurers to refrain from using the expiration of policyholders' drivers licenses or vehicle registration for 60 days from March 16, 2020 for any of the following reasons: (1) to affect a driver's ability to secure and maintain auto insurance coverage; (2) to affect a driver's eligibility for a Good Driver discount; (3) to determine eligibility for a California Low Cost Automobile policy; and (4) to impact the rates charged to any driver. The Notice will be re-evaluated in 60 days.	Auto	California Notice
CO	3-9-2020	Directs health insurance carriers to take the certain actions related to COVID-19 with respect to telehealth, prescription refills and cost sharing related to testing.	Health	Colorado Insurance Bulletin B-4.104
CO	3-17-2020	Establishes the coverage and cost-sharing requirements for commercial insurance carriers related to claims arising from the testing and treatment of COVID-19. COVID-19-related in-network telehealth services must be provided with no cost share. Carriers must cover at least one additional early refill of all necessary prescriptions and cannot apply a different cost-sharing amount to early refills (does not apply to prescription drugs with a high likelihood of abuse). When criteria for COVID-19 testing established by Colorado Department of Public Health are satisfied, insurer must provide coverage for the testing with no cost share and shall cover cost sharing for an in-network provider, urgent care center, or ED visit when the covered person is seeking COVID-19 testing.	Health	Colorado Emergency Regulation 20-E-01

		Carriers must cover out-of-network testing if in-network services not available.		
CO	3-19-2020	Allows for a special enrollment period for enrollment in an individual health benefit plan for a period of 15 days beginning March 20, 2020 until April 3, 2020.	Health	Colorado Emergency Regulation 20-E-02
CT	3-11-2020	Instructs insurers to accommodate travel cancellation requests under the terms of the policies taking into account the seriousness of the circumstances and the Emergency Declaration.	Travel	Connecticut Travel Insurance Notice
CT	3-9-2020	Encourages health insurers to waive cost-sharing related to COVID-19 testing and encourages waiver of cost-sharing for COVID-19-related telehealth services. Further encourages insurers to devote resources to inform enrollees, certificate holders, and insureds of available benefits and respond to inquiries; verify provider networks are adequately prepared; cover out-of-network testing and treatment if same not available in-network; authorize 90-day supplies of prescriptions; not apply penalties for failure to provide notice otherwise required by UR requirements when the individual sought COVID-19 testing or treatment; extend time limits for claim submission; and inform department of steps taken in response to the Bulletin.	Health	Connecticut Bulletin IC-39
CT	--	Prohibits negative claims activity when a business owner is only asking if they have Business Interruption Insurance and/or is asking if the policy covers/applies to this situation.	Business Interruption	Connecticut Notice
CT	3-19-2020	Suspends requirements for the licensure, certification or registration for telehealth providers that are Medicaid enrolled providers or in-network providers for commercial fully-	Health	Connecticut Executive Order No. 7G

		insured health insurance providing telehealth services to patients.		
DC	3-20-2020	The Department is currently conducting business via telework until April 27, 2020.	Department Operations	DC DOI
DE	3-9-2020	Reminds health insurers that testing for COVID-19 is a covered essential health benefit and that access to telehealth and telemedicine services should be made available.	Health	Delaware Bulletin No. 115
FL	3-6-2020	Directs insurers to implement heightened communications and customer service, provide coverage for COVID-19 testing, and review preparedness plans.	All insurers	Florida Information Memorandum OIR-20-01M
FL	3-10-2020	Reminds health insurers of Florida law regarding early prescription refills.	Health	Florida Informational Memorandum OIR 20-02M
FL	3-16-2020	Directs all insurers and entities regulated by OIR to review and update their Business Continuity Plans and/or Continuity of Operation Plans immediately.	All Insurers	Florida Informational Memorandum OIR 20-03M
GA	3-9-2020	Directs insurance companies to waive certain costs related to testing for COVID-19, and to provide updates to the Department regarding steps taken.	Health	Georgia Directive 20-EX-3
GA	3-17-2020	Provides additional financial protections for testing, creation of an expedited review process for carriers offering business interruption coverage tailored to COVID-19 and waiver of continuing education requirements for certain agents through April 30, 2020.	Health Business Interruption Agents	Georgia Directive 20-EX-4
GA	3-17-2020	Addresses business interruption insurance coverage and COVID-19, including endorsement forms relating to business interruption insurance and COVID-19.	Business Interruption	Georgia Bulletin 20-EX-3
HI	--	Hawaii Department of Commerce and Consumer Affairs, and the Insurance Division will be closed	Department Operations	Hawaii Response

		to the public through April 3, 2020. No walk in services will be available and the public is encouraged to use online services.		
ID	3-9-2020	Waives cost-sharing for Coronavirus testing.	Health	Idaho Department of Insurance News Release
IL	--	Illinois Department of Insurance is temporarily closing office locations as staff continues to work with limited staff. Consumers can submit insurance complaints electronically: IDOI Message Center or call 866-445-5364.	Department Operations	Illinois Response
IL	3-2-2020	Addresses balance billing and denial or termination of coverage related to COVID-19. States that travel insurance that otherwise covers risks related to sickness, accident, or death presumptively cover COVID-19.	Health Travel	Illinois Company Bulletin 2020-2
IA	--	Iowa Insurance Division Coronavirus Disease 2019 (COVID-19) Resource Center.	Public Resource	Iowa Coronavirus Disease 2019 (COVID-19) Resource Center
IA	3-17-2020	Implements the Division's business contingency plan. All consumer protection, financial regulation, product review, and licensing operations remain functional.	Department Operations	Iowa Bulletin 20-03
IA	3-19-2020	Requests all health insurers and HMOs to allow a premium payment grace period for individual and small group health benefit plans.	Health	Iowa Bulletin 20-04
KS	--	Kansas Insurance Department COVID-19 Consumer FAQs	Public	Kansas COVID-19 FAQ
KS	3-17-2020	Kansas Insurance Department is implementing alternative working arrangements which may alter filing timeframes and other Department operations.	Department Operations	Kansas Bulletin 2020-1

KY	3-16-2020	Extends time requirements for completion and submission of continuing education hours for March and April licensees.	Agents Producers	Kentucky DOI Announcement on CE Extensions
KY	3-18-2020	Waives requirements of KRS 304.17A-005(47)(c) in connection with good faith provision of telehealth using non-public facing audio or video communication products.	Health	Kentucky Telehealth Guidance
KY	3-20-2020	Suspends all insurance examinations.	Agents	Kentucky Insurance Exams Suspended
LA	3-17-2020	Enacts a COVID-19 Virus Work and Operations Plan for the agency. This plan provides for agency staffing with essential personnel while allowing non-essential employees to tele-work from home while providing necessary services to the public. This work plan has been incorporated into the LDI's Continuity of Operations Plan (COOP) and will be enacted beginning Tuesday, March 17, 2020 through Monday, March 30, 2020. Department has also provided answers to frequently asked questions for consumers related to health, travel, and business interruption insurance.	Department Operations Health Travel Business Interruption	Louisiana Plan of Operations
LA	3-17-2020	Addresses waiver of cost sharing for COVID-19 screening and testing, waiver of preauthorization for such testing and screening, and a required report regarding network adequacy to handle COVID-19 cases, including as necessary by offering access to out-of-network providers.	Health	Louisiana Emergency Rule 36
MA	3-6-2020	Lays out expectations for carriers in testing and treatment for COVID-19, including promotion of telehealth options, relax prior approval requirements, relax out-of-network requirements, and forego cost sharing and copayments.	Health	Massachusetts Bulletin 2020-02

MA	3-12-2020	Creates a Special Enrollment Period until April 25, 2020 for those individuals who do not have insurance.	Health	Massachusetts Bulletin 2020-03
MA	3-15-2020	Expands Telehealth Services, effective March 16, requiring health insurers to “allow all in-network providers to deliver clinically appropriate, medically necessary covered services to members via telehealth.” The Order requires that the insurers “shall not impose any specific requirements on the technologies used to deliver telehealth services (including any limitations on audio-only or live video technologies).” Insurers are “required to cover, without any cost-sharing (i.e., copayments, deductibles, or coinsurance), medically necessary treatment delivered via telehealth related to COVID-19 at in-network providers.”	Health	Massachusetts Order Expanding Telehealth Services
MA	3-16-2020	The Division of Insurance issues Bulletin 2020-04 directing health insurers to expand telehealth services to testing and treatment for COVID-19 and to forego any prior authorization and cost-sharing for treatment.	Health	Massachusetts Bulletin 2020-04
MD	--	Maryland COVID-19 Insurance FAQ	Public Resource	Maryland COVID-19 FAQ
MD	3-6-2020	Requires carriers to waive any time restrictions on prescription medication refills and authorize payment to pharmacies for at least a 30-day supply of any prescription medication, regardless of the date upon which the prescription medication had most recently been filled by a pharmacist. This will allow individuals to obtain medications in advance of any quarantine. Copayments and deductibles may apply to the prescription medication refills, in accordance with the terms of the carrier’s contract or policy.	Health	Maryland Bulletin 20-05

MD	3-10-2020	Requires carriers to waive cost sharing and imposes additional requirements with respect to prior authorization and other considerations regarding COVID-19 testing.	Health	Maryland Bulletin 20-06
MD	3-13-2020	Advises that a HCPCS code is available for laboratories to bill for certain COVID-19 tests.	Health	Maryland Bulletin 20-07
MD	3-16-2020	Permits title insurers to reschedule on-site review or audits for safety considerations.	Title	Maryland Bulletin 20-08
MD	3-18-2020	Informs consumers that global pandemics typically excluded from business interruption policies. Consumers advised to review specific terms of policies.	Business Interruption	Maryland Insurance Administration Advisory on Business Interruption Insurance
MD	3-20-2020	Requests that insurers that issue travel insurance policies during the COVID-19 emergency in Maryland provide an option for consumers to purchase a Cancel For Any Reason waiver, or otherwise offer an option to purchase trip cancellation coverage that will reimburse non-refundable costs if the trip is cancelled due to COVID-19.	Travel	Maryland Bulletin 20-09
MD	3-20-2020	Encourages carriers to make reasonable accommodations so that individuals and businesses do not lose coverage for nonpayment of premium during the emergency. 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.	All Insurers	Maryland Bulletin 20-10
ME	--	Maine Insurance Information Related to COVID-19	Public Resource	MAINE COVID-19 Insurance Landing Page
ME	3-12-2020	Addresses health insurer directives for coverage and testing of COVID-19, immunizations, emergency care, network adequacy, telehealth, access to prescription drugs, and utilization review. Notes that travel insurance has taken on	Health Travel	Maine Bulletin 442

		particular importance at this time, and travel insurers are reminded that policies must provide full coverage for all covered risks arising out of COVID-19 exposure and infection, subject only to such lawful exclusions as are clearly stated in the policy and agreed to between the insurer and the insured.		
ME	3-19-2020	For the duration of this emergency, prohibits health carriers from refusing, because of lack of credentials, to pay claims submitted by providers credentialed within a health care organization but not at that health care organization's location where the service was provided or at a location not in that health care organization.	Health	Main Supplemental Order re Credentialing
ME	3-20-2020	In addition to telehealth as defined in the Insurance Code, requires carriers to also provide parity in coverage for other clinically-appropriate remote delivery of medically-necessary health care services, including office visits conducted by non-public-facing telephone communication methods that have audio-only or audio-video capability, to the extent that the provider is permitted by law to provide such services.	Health	Main Supplemental Order re Remote Delivery
MI	3-12-2020	Expands telemedicine and announces that a number of health insurers have agreed to waive cost sharing on COVID-19 testing and requesting President Trump to permit a Special Enrollment period for ACA.	Health	Michigan Press Release
MI	3-20-2020	Grants regulatory flexibility to insurers for remote board of director meetings, annual stockholder meetings, and annual form filing requirements related to hard copies that would otherwise require original (wet) signatures.	All Insurers	Michigan Bulletin 2020-08-INS
MN	3-13-2020	Encourages Minnesotans who have purchased travel insurance and who cancel their trip as a	Travel	Minnesota Consumer Alert re Travel Insurance

		result of COVID-19 to review their policies to ensure that the costs will be covered.		
MN	3-13-2020	Asks that insurers limit/eliminate testing and treatment for COVID-19, keep provider networks up to date in anticipation of utilization increases, expand telemedicine, allow early refill of prescriptions, and provide access to information to enrollees regarding COVID-19.	Health	Minnesota to Health Insurers related to COVID-19
MO	3-3-2020	Addresses a broad range of health insurance issues that may be affected by COVID-19 including telemedicine, testing, access to information, network adequacy, utilization review, access to prescription drugs and future use of immunizations.	Health	Missouri Bulletin 20-03
MS	3-9-2020	FAQ addressing health insurance coverage for COVID-19 and travel insurance restrictions.	Health Travel	MID Coronavirus FAQ
MS	3-16-2020	Addresses use of telemedicine and processing claims during COVID-19.	Health	Mississippi Bulletin 2020-1
MS	3-18-2020	States that Department's Woolfolk Building office in Jackson is closed to the public until further notice.	Department Operations	Consumer Alert: MID Office Closed to the Public
MT	3-17-2020	Announces that uninsured Montanans who receive a recommendation from a healthcare provider will be eligible to received coverage for COVID-19 testing and treatment.	Health	Montana Announcement Re COVID-19 Testing
MT	3-18-2020	Expands access to telemedicine and encouraged health insurers to do the same.	Health	Montana Announcement Re Telemedicine
NC	3-10-2020	Directs the NC DOI to immediately work with health insurance plans operating in the state to identify any burdens for testing for COVID-19 as well as access to prescription drugs and telehealth services, as needed, in order to reduce cost-sharing (including, but not limited to,	Health	North Carolina Executive Order No. 116

		copays, deductibles, or coinsurance) to zero for all medically necessary screening and testing for COVID-19.		
NC	3-10-2020	Reminds health plans of compliance requirements for operations under a state of emergency for purposes of obtaining extra prescriptions during a state of emergency or disaster. Persons may obtain one refill on a prescription if there are authorized refills and not contrary to the dispensing authority of the pharmacy. This authorization of extra prescriptions during this state of emergency in NC is valid for prescription medication requests within 29 days of the issuance of this Bulletin (issued 3/10/20), unless extended by an Order issued by the Commissioner.	Health	North Carolina Bulletin 20-b-04
NC	3-12-2020	Requests insurers to identify and remove barriers to testing and treatment for COVID-19. The Department requests insurers that offer health benefit plans to NC residents to take the following immediate measures related to the potential impact of COVID-19: preparedness, information access, telehealth delivery of services, network adequacy and access to out-of-network services, prior authorization and cost-sharing requirements for COVID-19.	Health	North Carolina Bulletin 20-b-05
NC	3-19-2020	Agent services Division updates related to COVID-19.	Agents	North Carolina DOI Memo
ND	3-11-2020	Urges companies to waive cost sharing requirements for the testing of COVID-19 and encourages health insurance companies to review other operations in preparation for COVID-19 potentially coming to North Dakota. Outlines ten measures that the industry will be taking or plans to take as COVID-19 continues to	Health Travel	North Dakota Bulletin 2020-1

		progress: preparedness, information access, testing for COVID-19, telehealth delivery of services, network adequacy and access to out-of-network services, prior authorization, immunizations, access to prescription drugs, surprise medical bills, and travel insurance.		
ND	3-17-2020	ND DOI office locations will not be taking walk-in traffic until May 1, 2020. Other ways to contact the DOI (via phone and e-mail) are provided.	Department Operations	North Dakota DOI Website
NE	3-2020	Discusses different types of travel insurance and coverage for epidemics and pandemics.	Travel	Nebraska Consumer Alert
NE	3-2020	Discusses Department communications with the major health insurance carriers in Nebraska regarding coverage for COVID-19 and provided their responses. This document will be updated as the Department receives more responses from insurers.	Health	Nebraska Alert
NE	3-19-2020	Notice stating that neither CMS nor the State will 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.	Health	Nebraska Notice
NH	--	DOI information page and FAQs regarding COVID-19 and related coverage.	Public Resource	New Hampshire DOI Page
NH	3-10-2020	Directs all health carriers with respect to keeping consumers informed, testing for COVID-19 and treatment for initial diagnosis, site of service, telemedicine, network adequacy and access to out-of-network services, utilization review, and prescription refills.	Health	New Hampshire DOI Order Docket INS No. 20-016-AP
NJ	3-10-2020	Advises carriers to refrain from imposing cost-sharing COVID-19 test and to waive any cost-sharing for medically necessary COVID-19 lab tests. Further advises carriers to take actions in	Health	New Jersey Bulletin 20-03

		the following areas: keeping consumers informed, network adequacy and access to out-of-network services, utilization management, providing telehealth medical advice and treatment, covering costs if immunization becomes available, expanding access to prescription drugs, ensuring emergency care, and medical bills for inadvertent out-of-network services.		
NM	--	The NM OSI offices are closed to visitors and will not be scheduling meetings through April 6, 2020.	Department Operations	New Mexico DOI Notice
NM	3-6-2020	Urges all health insurers to at a minimum implement a number of proactive measures with their members.	Health	New Mexico Bulletin 2020-04
NM	3-11-2020	Directs the OSI to promulgate emergency regulations maximizing the available insurance coverage for New Mexicans suffering from COVID-19, pneumonia, or influenza, while simultaneously ensuring that medical costs do not create barriers to testing and treatment.	Health	New Mexico Executive Order 2020-04
NM	3-12-2020	Orders an emergency amendment to 13.10.13.12 NMAC, effective immediately, to declare presumptively unreasonable and prohibit any cost sharing requirement for the provision of health care services for COVID-19, pneumonia, influenza, or any disease or condition which is the cause of, or the subject of, a public health emergency.	Health	New Mexico Order Docket No. 20-00016-RULE-LH
NM	3-12-2020	Requires insurers to furnish certain information and data regarding compliance with Bulletin 2020-004 to the Superintendent electronically beginning no later than 3-23-20, and on a continuous basis thereafter.	Health	New Mexico Notice of Inquiry and Order Docket No. 20-00015-COMP-LH

NM	3-12-2020	Requires the insurer to provide every NM resident named as insured, participant, member, beneficiary or certificate holder under an excepted benefits policy or plan a Notice advising that the coverage provided under their benefits plan or policy is limited in nature and may not provide financial protection for significant costs incurred for the diagnosis or treatment of COVID-19 related illness. The required notice must be mailed or e-mailed to each required recipient no later than 5:00 p.m. on 3/20/20. The Notice must also be provided to any prospective purchaser of an excepted benefits policy or plan described in the Notice on or after the effective date of the Order (3/12/2020). Failure to comply with this Order may result in a fine or other penalty including suspension or revocation of the insurer's Certificate of Authority pursuant to § 59A-5-26(A)(1) NMSA 1978.	Health (Excepted Benefits)	New Mexico Notice and Order Docket No. 20-00017-COMP-LH
NM	3-13-2020	Notification to TPAs of Orders and emergency rules issued regarding COVID-19.	TPAs	New Mexico Letter to TPAs
NM	3-13-2020	Guarantees free COVID-19 testing and treatment for New Mexicans .	Health	New Mexico Press Release
NM	3-17-2020	Addresses Utilization and Reimbursement of Telemedicine During COVID-19 Public Health Emergency.	Health	New Mexico Bulletin 2020-005
NM	3-17-2020	Adds "disability-only insurance" to applicability for previous Order addressing excepted benefits policies.	Health (Excepted Benefits)	New Mexico Amended Notice and Order Docket No. 20-00017-COMP-LH
NM	3-20-2020	Requests all insurance companies to 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	All Insurers	New Mexico Bulletin 2020-006

		minimum, provide extended grace periods for payment of premiums. Further 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 their insurance payments. This should include alternate methods of payment, such as online payments, to eliminate the need for in-person payment methods in order to protect the safety of workers and customers.		
NV	3-5-2020	Prohibits cost-sharing for preventive services relating to COVID-19, requiring health insurers to inform consumers and providers on matters related to COVID-19, and requiring health insurers to provide coverage for off-formulary prescriptions in certain circumstances	Health	Nevada Emergency Regulation to Address COVID-19 Nevada FAQ Nevada Consumer Alert
NV	3-17-2020	DOI offices are closed to walk-in traffic until further notice.	Department Operations	Nevada Notice
NV	3-18-2020	States that any hearing request will not be processed until the DOI reopens, and the statutory deadline for setting the hearing will be tolled. All hearings currently scheduled or pending are continued.	All Insurers	Nevada Order in Response to COVID-19
NY	--	DFS Industry Information	Public Resource	DFS Info Page
NY	3-2-2020	Insurers directed to waive cost-sharing for coronavirus testing and to take other action included keeping consumers informed of available benefits and access to telehealth medical advice and treatment.	Health	New York Press Release
NY	3-3-2020	Instructs insurers to take action related to the potential impact of COVID-19. Issuers should ensure that they are prepared to address COVID-19 cases, including by providing insureds with	Health	New York Insurance Circular Letter No. 3 (2020)

		information and timely access to all medically necessary covered health care services.		
NY	3-6-2020	Allows travel agents and travel insurers to offer “Cancel for Any Reason” travel policies in New York state.	Travel	New York Travel Insurance Press Release
NY	3-6-2020	Permits cancel for any reason (CFAR) benefits to be sold in New York by an insurer if necessary or incidental to its travel insurance business. Non-insurers may also provide CFAR benefits if they are not sold as an insurance product. COVID-19 may be a basis for trip cancellation/interruption under a travel insurance policy.	Travel	New York Insurance Circular Letter No. 4 (2020)
NY	3-10-2020	DFS is requesting assurance that all regulated insurance entities have preparedness plans to address the operational risk, and are identifying, monitoring, and managing the financial risk, posed by COVID-19.	All Insurers	New York Insurance Circular Letter No. 5 (2020)
NY	3-10-2020	DFS requests assurance that regulated institutions have preparedness plans in place to address operational risk posed by the outbreak of a novel coronavirus known as “COVID-19.”	All Insurers	New York Industry Letter
NY	3-10-2020	DFS requests assurance that regulated institutions are identifying, monitoring, and managing the potential financial risk arising from the spread of a novel coronavirus known as “COVID-19”.	All Insurers	New York Industry Letter
NY	3-10-2020	DFS request assurance that regulated institutions have preparedness plans in place to address operational and financial risk posed by the outbreak of a novel coronavirus known as “COVID-19.”	All Insurers	New York Guidance to DFS
NY	3-12-2020	Grants temporary relief to COVID-19 affected regulated entities and persons from certain requirements under the Banking Law, the Financial Services Law, and the regulations	All Insurers	New York Order Granting Temporary Relief to COVID-19 Affected Regulated Entities and Persons

		promulgated thereunder. Orders individuals that are employed by or working for regulated entities or persons and are conducting licensable activities from their personal residences or other temporary location due to the outbreak of COVID-19 to remain subject to the full supervision and oversight of such regulated entities and persons, and such regulated entities and persons shall maintain appropriate safeguards and controls, including but not limited to those related to data protection and cybersecurity, to ensure continued safety and soundness of such regulated entities and persons. Further, such individuals may not conduct licensable activities in person with members of the public at or from their personal residences.		
NY	3-13-2020	Emergency regulation directing health insurers to waive cost-sharing for novel coronavirus testing. Emergency regulation prohibits insurers from imposing cost-sharing, copayments, coinsurance, or annual deductibles for novel coronavirus diagnostic testing	Health	New York Press Release
NY	3-15-2020	Instructs health plans to ensure that telephonic and video modalities are covered for telehealth when medically appropriate for the provision of services covered under a policy or contract, including Medicaid coverage.	Health	New York Insurance Circular Letter No. 6 (2020)
NY	3-16-2020	Announces special enrollment period for uninsured.	Health	New York Special Enrollment Press Release
NY	3-17-2020	Addresses cost sharing for testing, treatment and use of telehealth services for COVID-19.	Health	New York Emergency Regulation
NY	3-19-2020	Urges regulated entities to support consumers and business impacted by novel coronavirus (COVID-19), including payment accommodations,	All Insurers	New York Insurance Circular Letter No. 7 (2020)

		working with consumers to avoid non-renewal and cancellation, and flexibility regarding proof of death, disability, or other condition that triggers benefits under life insurance policies or annuity.		
OH	3-6-2020	OH DOI FAQ Page regarding insurance related questions for insurers and consumers.	Public Resource	Ohio DOI FAQ
OH	3-11-2020	Reminds issuers of travel insurance that unless a specific exclusion applicable to COVID-19 applies, a travel insurance policy that covers for sickness, accident, disability or death occurring during travel must cover such risk related to COVID-19. Reminds issuers of sickness and accident policies that emergency care must be covered without preauthorization, encouraging issuers to proactively evaluate the appropriateness of applying utilization review management for testing and treatment of COVID-19, encouraging issuers to provide telemedicine coverage and ensuring access to providers and prescription drugs supplies.	Travel Health	Ohio Bulletin 2020-02
OK	--	OK DOI FAQ Page regarding insurance related questions for consumers.	Public Resource	Oklahoma DOI FAQ
OK	3-17-2020	Asks health carriers to take the following action: review internal processes to ensure they are prepared for COVID-19, inform insureds of available benefits specifically relating to telemedicine, waive any cost-sharing for COVID-19 lab tests and office visits when testing, verify adequacy of networks, health carriers shall not cancel coverage of any person who has been diagnosed with COVID-19 and is unable to work and maintain coverage, pharmacists writing "COVID-19" or substantially similar language on	Health	Oklahoma Bulletin 2020-02

		prescription shall be equivalent to receiving a signature.		
OR	--	OR DOI FAQ page with information regarding which insurance companies have agreed to waive co-payments, co-insurance, and deductibles for their customers who need COVID-19 testing.	Public Resource	Oregon DOI Coronavirus FAQ Page
PA	--	PA DOI FAQ page regarding all insurance related questions.	Public Resource	Pennsylvania DOI FAQ Page
PA	3-19-2020	Temporarily extends license renewal deadlines for licenses impacted by extenuating circumstances related to COVID-19. Department temporarily waives CE requirements for licensees who cannot meet requirements	Agents	Pennsylvania Notice
PA	3-19-2020	Notifies that Department will accept electronic filings and encourages electronic filing be sent (in addition to any paper filings). Department requests insurers and other licensees review the filing which they currently have pending and withdraw any that are not immediately necessary and hold any planned filings until further notice.	All Insurers	Pennsylvania Notice
PA	3-19-2020	Encourages insurers to consider the following action: consistent with prudent insurance practices, relaxing due dates for premium payments, extending grace periods, waiving late fees and penalties, and allowing payment plans for premium payments to otherwise avoid lapse in coverage.	All Insurers	Pennsylvania Notice
RI	--	Creates a special enrollment period until April 15 for Rhode Islanders seeking health coverage on HealthSource RI.	Health	Rhode Island Website

RI	3-19-2020	States Department not taking administrative action to enforce in person appraisal requirements for motor vehicle appraisals. Insurers must implement policy for remote appraisals in a nondiscriminatory manner.	Auto	Rhode Island Bulletin No. 2020-2
RI	3-19-2020	Extends all March 31, 2020 expiration dates to April 30, 2020. In person licensing exams suspended until April 30, 2020. Encourages the use of virtual CE.	Agents	Rhode Island Bulletin No. 2020-3
SC	--	A running list of insurance companies and their response to COVID-19.	Public Resource	Health Insurance Issuers' Response to Coronavirus
SC	3-12-2020	Announces health insurance companies are waiving the cost sharing for testing.	Health	South Carolina DOI's Response to COVID-19
SC	3-19-2020	Extends Hurricane Dorian insurance claims data call deadline to Friday, May 15, 2020.	Property and Causality	South Carolina Notice
TN	3-9-3030	Encourages health carriers to review internal processes for preparedness to address COVID-19 cases, waive cost shares for visits and testing for COVID-19, verify network adequacy to handle potential increase in the need for healthcare services, not use preauthorization as a barrier to access necessary for the treatment of COVID-19, made expedited formulary exceptions and report to the Department on the steps they are tweaking to respond along with any claims for COVID-19 testing.	Health	Tennessee Bulletin 20-02
TX	--	COVID-19 Texas Department of Insurance Resource page.	Public Resource	TDI Resource Page
TX	3-11-2020	Asks health insurers operating in Texas to waive costs associated with COVID-19 testing and telemedicine visits, waive penalties or restrictions on claim denials for necessary out-of-network services, waive requirements for	Health	TDI Bulletin B-005-20

		preauth and medical necessity reviews and allow extra time for health providers to file claims.		
TX	3-17-2020	<p>Waives certain regulations relating to telemedicine care.</p> <p>Emergency relating to telemedicine care for patients with state-regulated insurance plans to help doctors across Texas continue to treat their patients while mitigating the spread of COVID-19. The rule further expands coverage for medical services or consultations by phone.</p> <p>Texas Medical Board guidance further allows physicians and other health-care professionals to use phone consultations to establish a physician-patient relationship.</p>	Health	<p>Texas waives certain telemedicine regulations</p> <p>COVID-19 Emergency Rule</p> <p>Telemedicine Emergency Rule FAQ</p> <p>Texas Medical Board Press Release</p>
UT	3-17-2020	Asks health insurers to take immediate measures including: devoting resources to inform insureds, waiving any cost-share for COVID-19 testing and associated visits, ensure telehealth provider network robust, waive prior authorization for services related to COVID-19, allow one-time refills for prescription before scheduled refill, and review internal operations to ensure prepared. The Department also asked out of network providers to accept highest of insurer's network reimbursement as payment and full and not balance bill for anything related to COVID 19.	Health	Utah Bulletin 2020-1
UT	3-19-2020	Urges health insurers to expand coverage for COVID-19, references actions to be taken in Bulletin 2020-1.	Health	Utah Notice
VA	--	All business with Department must be done through electronic filing	All Insurers	Virginia Department Website

		Licensing exam centers closed on a case by case basis Timeframe for applicants extended to submit required documents from 30 to 90 days. Application processing may exceed 15 days.		
VT	3-9-2020	Instructs all health insurers that provide comprehensive health care coverage to take action related to the potential impact of COVID-19, including the coverage of any medically necessary testing with no cost-share to members.	Health	Vermont Bulletin 209
VT	3-17-2020	Directs insurers to make at least 30 day supply of medication available to members refilling prescriptions. It further encourages insurers to make available larger than 30-day supply when appropriate.	Health	Vermont Bulletin 210
VT	3-18-2020	Directs insurers to suspend all routine provider audits	Health	Vermont Bulletin 210 (Revised)
VT	3-19-2020	Urges health insurers to expand coverage and reimbursement of telemedicine services including audio-only telephone, e-mail, fax where clinically appropriate, and apply same cost-share as in person visit.	Health	Vermont Memorandum
WA	3-5-2020	Waives any cost share for health care provider visits and testing for COVID-19 testing. Allows enrollees to obtain a one-time refill prescription prior to expiration. Suspends preauthorization for testing and treatment of COVID-19.	Health	Washington Emergency Order 20-01
WI	3-6-2020	Instructs health plans to take immediate measures relating to potential impact of COVID-19 including preparedness, information access, testing and waiver of cost shares, telehealth delivery, network adequacy, utilization review and information sharing.	Health	Wisconsin Bulletin

WI	3-15-2020	Guidance regarding and flexibility with annual meeting requirements and filing deadlines.	All Insurers	Wisconsin Bulletin
WV	3-9-2020	Instructs health plans to take immediate measures relating to potential impact of COVID-19 including preparedness, information access, testing and waiver of cost shares, telehealth delivery, network adequacy, utilization review and information sharing.	Health	West Virginia Bulletin 2020-01
WV	3-13-2020	Mandates coverage for telehealth. Generally requires that a health insurer provide coverage of health care services provided through telehealth services if those same services are covered through face-to-face consultation by the policy.	Health	West Virginia Bulletin 2020-03
WV	3-13-2020	Requests assurance that insurers have continuity of operations and preparedness plans to address operational risks and that they are identifying, monitoring and managing the financial risk posed by COVID-19. Requires foreign carriers to submit a response to the Commissioner within 20 days, describing plans of preparedness to manage risk of disruption to operations and financial risk. Domestic carriers will receive separate guidance specifically targeted to them.	All Insurers	West Virginia Bulletin 2020-04
WV	3-13-2020	Requires insurers to cover an additional one-time early refill of any necessary prescriptions to ensure individuals have access to their necessary medications. For maintenance meds, insurers must permit insured to obtain a 90-day supply upon refill. Insurers to make formulary exceptions, encourage the use of mail order and allow temporary use of out-of-network pharmacies in the case of shortages.	Health	West Virginia Bulletin 2020-05
WV	3-13-2020	Declares an insurance emergency in the state of West Virginia and orders insurers and other	All Insurers	West Virginia Insurance Emergency Order

		regulated entities to continue to adjust claims as expeditiously as possible during the emergency, utilize all possible methods of adjusting claims remotely, and strive to meet the normal time frames.		
WV	3-17-2020	Issues temporary producer license to applicants for producer license on a case-by-case basis without requiring testing or fingerprints	Producers	West Virginia Bulletin 2020-06
WY	3-11-2020	Encourages the waiver of cost shares for visits and testing for RSV, influenza, respiratory panel test and COVID-19. The liberalization of telehealth benefits and notice to the Department of a company's COVID-19 coverage plan (by March 18, 2020).	Health	Wyoming Bulletin 20-01