The December 2, 2015, meeting of the Student Insurance Advisory Committee (SIAC) was called to order at 12:30 p.m.

Members in Attendance:
Cindy Bontrager, COBO (Chair)  
Lauren Arney, Student representative, KU  
Diana Malott, KU  
Angela Murphy, Student representative, KU  
Madi Vannaman, KBOR

Members Participating by Telephone:
Mary McDaniel, ESU  
Sheryl McKelvey, WSU  
Carol Solko-Olliff, FHSU

Also present at the meeting were Lesley Gagnon, Mercer, and Julene Miller, KBOR.

Participating by phone were Valerie Noack, KUMC; Vickie Mense representing PSU as Cathy Lee Arcuino was unavailable; Matt Brinson and Dale Burns, UHC-SR; Bryan Kakita and Liz Marks, Mercer; Mary Karten and Regina Sherrill, KU. Jim Parker, KSU, was unable to participate.

Minutes
The minutes from the September 2, 2015 meeting were approved as distributed.

MHECare Report
Bryan Kakita reviewed the information contained in the MHECare report and he highlighted changes through the end of October. Very little changed with the additional three months of data; the lost ratio increased slightly from 53.3% to 54.9%. Bryan Kakita’s general comment was that the plan is still running very well.

The number of large claims and the magnitude have not changed in the last three months but Mercer will continue to keep an eye on them because of the nature of large claims.

An updated report will be provided at the next meeting which will provide highlights for the entire year and some emerging data from 15-16 plan.

Graduate Student Insurance Plans
An update was provided to the issue related to the application of the Affordable Care Act (ACA) to student health insurance plans, and coverage for graduate students and premium subsidies.

Matt Brinson shared that direction from the federal agencies was expected in August 2015 but was not provided. UHC-SR continues to hear positive things about the outcome regarding subsidies but nothing official or formal has yet been released. The American Council on Education (ACE) has been providing feedback to the IRS and HHS regarding the negative impact removing subsidies would have on students and student insurance plans.

Diana Malott asked whether UHC-SR has been seeing universities changing policies or are they taking a wait and see approach. Matt Brinson responded that the general consensus is to take a wait and see
approach. Matt Brinson stated that one UHC-HR client, Alabama, has shifted from a subsidy to a stipend and instituted a waiver for graduate students required to have health insurance.

Angela Murphy asked if contingencies are being considered in the event there was an unfavorable decision. Liz Marks replied that some universities are looking at putting students in an employer plan. The American College Health Association had a national conference call on this topic and Steven Bloom from ACE told the group that there was to be another call involving the three governmental agencies (Department of Labor, Health and Human Services and the IRS) to make progress on identifying and addressing the issue as there is recognition that this needs to be fixed. The message is “not to worry, this will be fixed.” But there may be a little more time before the solution is developed with the additional challenge of the upcoming election. Liz Marks indicated she would follow up to see about the outcome of the Bloom conference call and whether there are some next steps that can be looked at.

Angela Murphy asked about the impact to the student insurance plan in light of UnitedHealth Care moving away from federal and state exchanges. Dale Burns replied that the claims experience in the federal exchanges is not good so the decision to reassess UHC’s participation will be made before 2017. The insurance plans sold by UHC on the exchanges represent a small subset of all UHC insureds. Leaving the federal exchanges will not impact UHC’s student division which is a separate entity that covers approximately 500,000 students and dependents. UHC is very committed to the student market.

Dale Burns shared that a recent proposed Centers for Medicare & Medicaid Services (CMS) rule, published on December 2nd, noted that the Patient Protection and Affordable Care Act (commonly called the ACA) should not be construed to harm student health insurance market. Virtually all colleges and universities that provide student insurance subsidize insurance for graduate students.

**Proposed Changes to Student Health Insurance Plans**

The Department of Health and Human Services released proposals for plan years beginning on or after January 1, 2017 that would:

I. Subject insurers of student health insurance plans to the single risk pool index rating methodology, although they may establish one or more separate risk pools for each college or university, provided the risk pools are based on a bona fide school-related classification and not based on a health status related factors.
   a. Also, propose to eliminate the requirement for student health insurance plans to offer coverage within specific metal levels, and instead would require student health insurance plans to offer an actuarial value of at least 60%.

II. To require all issuers to submit the unified rate review template (URRT) for all single risk pool products in the individual and small group markets (excluding student health plans) regardless of whether they propose rate increases, rate decreases, or no change in rates for these products.

Related to item I(a) above, Dale Burns shared that some insurers, on behalf of Colleges and Universities have asked for relief from the regulations issued regarding Student Health Insurance Plans (SHIP) requiring that the plan have an Actuarial Value (AV) that fits within the “Metallic Bands” prescribed for individual Insurance products. ACA categories SHIP as Individual Coverage. The issue has not arisen for the KBOR plan, but impacts other plans when the calculated AV do not fit within a metallic band. The AV of some student plans with low deductibles and high coinsurance exceeded the platinum band and benefits had to be decreased in order to fit into a metallic band. If the benefits were not decreased, the insurance companies could not provide documentation to the insured that ACA compliance coverage was maintained, and the insured could be subject to the fine for not complying with the individual mandate. Insurance companies,
on behalf of Colleges and Universities, have been asking for an exception so that student insurance plans do not have to fit into a metallic band. The proposed rule, that would be effective for plans on/after January 1, 2017, would exempt student insurance plans from metallic banding as student plans do not need to be compared to plans offered on the insurance exchanges that offer individual coverage. AVs for student plans effective on/after 1/1/17 have to exceed 60% and will not have to fit into metallic bands used for the individual plans sold on the exchanges. Since this proposed rule is for plans effective on/after January 1, 2017, the KBOR renewal for 2016-2017 will have the AV calculated, and if the AV exceed the metallic band, discussion will be necessary about what benefit changes to make for plan year 16-17.

The proposal also included rating rules with some changes in the methodology used by actuaries for the rating index. UHC actuaries will go through the process to ensure the KBOR plan complies. The KBOR plan experience so far is very favorable.

Diana Malott asked when the renewal would be ready for review, and Dale Burns responded that by the end of December the proposal will be provided to Mercer/MHEC and he expects the information will be provided to the SIAC by mid-January 2016.

**Enrollment dates**

In a November 24, 2015, email, Matt Brinson wrote, “Yes, students can enroll into spring coverage now. Once online enrollment is live students can purchase all periods (fall, spring/summer, summer) until that period’s open enrollment end date has passed in which it is then turned off.”

Matt Brinson stated that students can enroll prior to the Open Enrollment period and noted that the only significant Open Enrollment period is the cutoff date. Once on-line enrollment is live, the Open Enrollment period will go live and a student can enroll effectively for spring coverage in November.

At the meeting Matt Brinson stated he would provide additional clarifying information. [After the meeting, in a 12/9/15 email, Matt provided the following information:

*The UHC-SR Eligibility Department confirmed that once on-line enrollment is activated students can enroll in any period and that period will close after the open enrollment end date. Currently, students can enroll only in the Spring, Spring/Summer and Summer periods. Annual and Fall period enrollment have been disabled since the open enrollment end dates have passed.*]

**International Dependent Insurance Coverage**

A KU international student, enrolled in coverage for himself and his spouse, received an email from UHC-SR on 12/1/15 alerting him that his coverage will expire 12/31/15 and to avoid a lapse in coverage payment must be received by 1/1/16. The email included information about coverage and the premium for the student’s spouse for coverage through 7/31/16 (spring and summer semesters).

Diana Malott stated that over 30 KU international students with dependent coverage received an email indicating enrollment for spring coverage for their dependents closes 12/31st. She noted that enrollment for students for spring coverage goes through 1/31 and international students will not be fully enrolled until after classes start so dependents would not be enrolled.

Dale Burns stated that dependents can send enrollment to UHC-SR and it will be held until the student enrolls and then dependents will be provided with the same effective date. If a university’s list of international student enrollment is sent on 2/8, it will be loaded and the student and dependent would have a
1/1 effective date. There is a 14 day grace period for dependent coverage to be back-dated. The email has been sent for several years and is used nationwide; it is the standard renewal notification. UHC-SR cannot provide information about the 14 day grace period in the email as the information would need to be modified state-by-state.

At the meeting, Matt Brinson stated he would follow up to find out why the default provided spring/summer coverage when international students have to enroll each semester. [After the meeting, in a 12/9/15 email, Matt provided the following information:

The UHC-SR Eligibility Department did confirm that our system is programmed in such a manner that the renewal notice will select the largest period within our system. If Spring coverage period and Spring/Summer coverage period are offered the system will select Spring/Summer.

One change that we could review is to remove the Spring/Summer option for Dependents. The renewal notice will then default to the Spring period only. However we did run enrollment reports and noticed that we are receiving international lists for the Spring/Summer period.

If possible we would like to add this to the February agenda. We would like to address with the Committee and make sure this does not negatively impact any School before changes are made.]

This item will be an agenda topic for the February 3, 2016 SIAC meeting.

Mary Karten asked whether back-dating dependent coverage effective dates was possible so the date matches the student’s effective date. Dale Burns stated that could be done on a limited basis and he will check with underwriting to see how many days might be available for voluntary dependents. [After the meeting, in a 12/9/15 email, Heather Lewis, UHC-SR, provided the following information:

Matt & Dale spoke to underwriting regarding your concerns surrounding open enrollment dates for dependents on the GTA policies. Underwriting has agreed to a 21 day open enrollment period (coverage will be backdated to the effective date of the period) and a deadline to enroll of 30 days after the effective date. The dates have been updated in our system to reflect those of the current voluntary and international policies.

The open enrollment dependent dates would apply to the International policies as well.]

Diana Malott asked about a graduate teaching assistant who qualifies for the university subsidy who received the renewal email. The renewal premium reflected the rate after the university subsidy. What would happen if the student was not eligible for the subsidy? Dale Burns replied that the student would be moved from option 3 (the graduate student plan) to either option 1 (domestic students) or option 4 (international students).

Angela Murphy asked whether an option could be provided to graduate students in the option 3 plan so they could enroll in both spring coverage and continuation coverage for the summer as there are graduate students who know they will not have a summer appointment that qualifies to receive the university premium subsidy. Dale Burns stated he will investigate whether UHC-SR could allow this option. [After the meeting, in a 12/8/15 email, Heather Lewis, UHC-SR, provided the following information:
UHC-SR has created an enrollment form for review (attached). These enrollments would need to be handled on a case by case basis, similar to how we currently process qualifying life event enrollment, with additional assistance from the individual university.

To enroll in coverage via the attached form, the student would not be able to follow the current process for requesting enrollment in the subsidized policy via our payment management site. We would need to receive the completed enrollment form with payment for the spring and summer continuation periods, invoicing the university for the remainder of the premium amount for spring.

Dale Burns suggested that this be added for discussion in February’s meeting.

*This item will be an agenda topic for the February 3, 2016 SIAC meeting.*

**Good of the Order**
Mary McDaniel, ESU, shared that the ESU subcommittee recognizes that the UHC-SR definition of spouse states “legal marriage” and would like to know whether common-law same sex/gender marriages would fall under that definition. Dale Burns replied that UHC-SR’s legal counsel states that if the marriage is recognized under the state’s law then it would fall within that definition.

Valerie Noack, KMC, asked whether clinical school-sponsored activities can be included for eligibility purposes. Matt Brinson stated that if it is a university approved and sponsored internship then it would be included in the UHC-SR eligibility criteria.

**Future SIAC meetings**
Future SIAC meeting tentatively scheduled for 12:30, KBOR Board Room
1. Wednesday, February 3, 2016
2. Wednesday, May 4, 2016