



COLORADO

Department of
Regulatory Agencies

Division of Insurance

Colorado Option Advisory Board Meeting Minutes

February 25, 2025, 3:30 - 5:30 PM

Adam Fox called the meeting to order at 3:35 p.m.

Those in attendance were:

- Present (8): Adam Fox, Dr. Reginald Washington, Chris Zivalich, Amanda Massey, Judith Padilla, Joseph Theine, Amanda Uehlein, Andy Jacob
- Absent (3): Valerie Larson, Bianey Bermudez, Dr. Qaisar Khan

Others present from the Division of Insurance (DOI) included Sara Bencic, Maddie Davis, Daisy Zoll, Kate Davidson, Tim Churchill, and Kyla Hoskins. Colette Kavanagh attended from the Attorney General's Office.

October Meeting Minutes

Dr. Washington moved to approve the meeting minutes. Joe Theine seconded. Adam Fox, Andy Jacob, and Amanda Uehlein abstained from the vote to approve the meeting minutes as they were absent from the October meeting. The October meeting minutes were approved.

New Board Member Introductions

The newest board member, Amanda Uehlein, introduced herself to the board. She is the Executive Director of the Grand County Rural Health Network and replaced the seat previously occupied by Jennifer Fanning. This seat represents consumer advocacy organizations. Existing board members also introduced themselves to Amanda Uehlein.

Advisory Board Discussion/Items for Follow-Up:

- No discussion or follow-up items.

Program Implementation Updates

Presented by Colorado Option Director Sara Bencic.

- **Colorado Option Regulations.** The Commissioner of Insurance adopted Emergency Regulations 25-E-01 and 25-E-02. Draft Proposed Amended Regulations 4-2-81 and 4-2-85 were released for external review. Rulemaking hearings for 4-2-81 and 4-2-85 are upcoming.
- **Colorado Option Bulletins.** The Commissioner adopted Amended Bulletin B-4.123.



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- **Rates & Plan Enrollment.** Plan Year 2025 open enrollment concluded on 1/15/25. Colorado Option plans captured 47% of all plan enrollments on Connect for Health Colorado.
- **Premium Rate Reduction Hearings.** Carriers submit Plan Year 2026 Colorado Option premium Rate Reduction filings on 3/3/25.
- **Workforce Trends Reports.** DIRA is compiling data for the Year 3 report.
- **1332 Waiver Administration.** The DOI received \$339 million in 2025 passthrough funding.

Advisory Board Discussion/Items for Follow-Up:

- No discussion or follow-up items.

Plan Year 2025 Open Enrollment Data

Sara Bencic presented information about Colorado Option enrollment during the 2025 open enrollment period.

Advisory Board Discussion/Items for Follow-Up:

- Andy Jacob asked if the Division knows why there was a large growth in Option plan enrollment this year and if it had anything to do with Medicaid unwinding.
 - Sara Bencic responded that the DOI is not sure at this time as the data is not yet available, but the DOI is hoping to get some more information about this in the future. The average premium change was also lower for Colorado Option plans than for non-Colorado Option plans, which may have affected consumer shopping decisions.
- Dr. Reginald Washington said that he believes the DOI has received some feedback regarding people having difficulty enrolling in Colorado Option plans and that people are unable to access the \$0 benefits included in their Option plans. He believes that the advisory board should get to see data about this if it is available.
 - Sara Bencic responded that Mathematica is currently conducting an evaluation of the Colorado Option program as a part of a statutory requirement. They will be hosting several consumer focus groups that may shed light on whether or not this is actually an issue.
 - Adam Fox added that usually Connect for Health Colorado puts out open enrollment reports later in the spring, so those will likely be available in a month or two and will provide additional insight. These reports include a customer satisfaction survey, and there were a few questions about the Colorado Option included in that survey.



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- Joe Theine brought up the possibility that the federal enhanced premium tax credits could expire at the end of this year unless Congress extends them. He said it will likely be hard for the carriers to plan around the multiple scenarios of the subsidies expiring or not expiring. He asked if these potential scenarios will change anything for Colorado Option plans and premium rate reduction requirements.
 - Sara Bencic responded that because of this uncertainty, the DOI is trying to plan and understand what could be the impact on rates if the enhanced subsidies are not extended. The plan and guidance for carriers is in progress.
 - Kyla Hoskins also responded that this will affect all plans, not just Colorado Option plans. The DOI will communicate with carriers when more is known.
- Joe Theine asked if there is any estimate as to what enrollment will be if there are no longer enhanced premium tax credits. He is curious about this, especially from a provider point of view, as this could affect operating margins and levels of uncompensated care.
 - Sara Bencic said that she is not sure at the moment, but the Urban Institute and others have put out some estimates on these numbers.
 - Adam Fox responded that in his experience as a Connect for Health Colorado board member, Colorado will likely see an enrollment decrease of 20-30% if the enhanced premium subsidies go away.
- Amanda Uehlein asked if the number of small group enrollments presented in the slides count those who are enrolled through an ICHRA.
 - Sara Bencic said that anyone enrolling through Connect for Health Colorado would be captured in the individual market side of the data.
- Amanda Uehlein also asked why there were less than 12,000 enrollees in SilverEnhanced Savings if there were 12,000 slots available.
 - Adam Fox, who is a member of the Connect for Health Colorado board, responded that the folks who are enrolling through Colorado Connect for SilverEnhanced Savings had the option to renew coverage if they were enrolled for Plan Year 2024 and were still eligible. Colorado Connect then opened up the remaining spots that were still available on November 25, 2024. However, the Colorado Connect platform ran into some system errors that were locking people out of completing the application process, so they are trying to follow up with people who were “in line” for one of the 12,000 SilverEnhanced Savings spots but who were not able to complete enrollment due to the system glitch. A lot of the folks have been reached, but they are still trying to get all of those folks enrolled.
 - Amanda Uehlein asked if there is a deadline for the SilverEnhanced slots being opened up to those next in line.



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- Adam Fox responded that folks who ran into those system errors have until March 15 to enroll. After that timeframe, presumably Colorado Connect could open any remaining spots. There were more than 12,000 people who applied for the SilverEnhanced Savings spots, so they already have people in line for any spots that may open up.
 - Kyla Hoskins said that we will flag this situation for our colleagues at the DOI who work on the Health Insurance Affordability Enterprise so that they are aware of the issue and help address it if necessary.
- Chris Zivalich asked about the enrollment process for OmniSalud, specifically the SilverEnhanced Savings slots, and how Colorado Connect is following up with consumers who ran into the platform glitch. If someone was in the process of enrolling with the help of an organization or enrollment assister, is Colorado Connect reaching out to the organization or assister or the consumer directly?
 - Adam Fox said his understanding is that Colorado Connect is essentially trying to use whatever methods they can to reach these folks, whether that be through brokers, enrollment assistance sites, or contacting the individual or family directly.
- Judith Padilla said that she has heard from the community that the people who were enrolled in OmniSalud said that there are people from Colorado Connect calling them and reaching out to them by email as well. There are also people at Colorado Connect that can help if an individual can't speak English or Spanish.

Colorado Option Evaluation Updates

Sara Bencic shared an update about the Colorado Option evaluation.

Advisory Board Discussion/Items for Follow-Up:

- Dr. Reginald Washington said that he is looking forward to seeing the results of the evaluation.

Public Comment

- No attendees had a public comment to make.

Adam Fox adjourned the meeting at 4:34 p.m.