



October 20, 2025

RE: Idaho Department of Insurance Bulletin No. 25-06 – Unfair Trade Practices in Medicare Insurance Markets

Dear NAIC Leadership and Members:

On behalf of the National Association of Insurance & Financial Advisors (NAIFA) and our members nationwide, we write to commend Idaho Director Dean Cameron and the Idaho Department of Insurance for their leadership in issuing Bulletin No. 25-06. This bulletin addresses troubling unfair trade practices occurring in the Medicare insurance marketplace that undermine market integrity and harm both Medicare beneficiaries and the agents that serve them every day.

Idaho has taken a strong stand against carriers who restrict consumer access to insurance products through deceptive practices, including implementing zero-commission or substantially reduced commissions on select Medicare products; changing commission structures mid-year; discouraging producers from selling certain products; and removing enrollment applications from their websites. The Department's bulletin makes clear that these tactics constitute unfair trade practices that should be addressed immediately.

The practices identified in Idaho's bulletin are not isolated to one state. NAIFA members across the country have reported similar carrier behavior, particularly in Medicare Advantage, Part D, and Medicare Supplement markets. When carriers file products with specific rate structures that include producer compensation, then unilaterally withdraw that support mid-year, they undermine market stability, harm consumers who lose access to professional guidance, and create an uneven competitive playing field.

We respectfully urge each state insurance regulator to review their own unfair trade practice statutes and enforcement practices in light of Idaho's bulletin. Specifically, we encourage you to:

- Examine whether similar manipulative practices are occurring in your state's Medicare insurance markets.
- Consider issuing guidance clarifying that such practices constitute unfair trade practices under your state law.

NATIONAL ASSOCIATION OF INSURANCE AND FINANCIAL ADVISORS

1000 Wilson Boulevard, Suite 1890, Arlington, Virginia 22209 | 703-770-8100 | www.naifa.org



- Monitor carrier conduct regarding product accessibility and mid-year compensation changes.
- Take appropriate enforcement action against carriers engaging in these harmful practices.

Insurance markets function properly only when carriers honor their commitments to the marketplace. Medicare beneficiaries deserve access to competitive insurance products and licensed financial professionals who provide trusted advice to guarantee they enroll in policies that best fit their healthcare needs.

Idaho Bulletin 25-06 represents sound regulatory leadership that protects consumers and preserves market integrity. We encourage all state insurance regulators to follow Idaho's example and ensure that carriers compete fairly and maintain their commitments to the markets they serve.

NAIFA stands ready to work with state insurance departments to address these unfair trade practices and protect the interests of insurance consumers and the trusted agents who serve them. Thank you for your leadership on this important consumer protection issue.

Sincerely,

Doug Massey, CLU, ChFC, FSS, LUTCF
President
NAIFA