
POLICY TITLE: STUDENT HEALTH INSURANCE POLICY

Date of Initial Approval: 11/20/2024

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Category: University Policy

Responsible Office: Financial Aid, Office of Finance

Stakeholders Involved in Review: Financial Aid Account Specialist, Financial Aid Director, HSA Consulting (HSAC), Assistant General Counsel, VP of Finance, Director of Tracks & Special Programs, COM Deans

Accreditation Standards: Commission on Osteopathic College Accreditation: Element 9.11; Council on Accreditation of Nurse Anesthesia Educational Programs: Student Services; Accreditation Review Commission on Education for the Physician Assistant: Standard A1.05

PURPOSE & SCOPE

The purpose of this policy is to ensure that Rocky Vista University (RVU) students maintain continuous PPACA-compliant health insurance coverage throughout their enrollment. This policy applies to all enrolled students; it articulates requirements for participation in the Student Health Insurance Plan (SHIP) offered through RVU's designated health insurance broker and conditions under which a waiver may be requested.

POLICY STATEMENT

All currently enrolled RVU students must have comprehensive health insurance coverage to protect them from unexpected medical costs, ensure access to necessary care during didactic and clinical phases of their programs of study, support their mental and physical well-being in a rigorous educational environment, and ultimately contribute to the development of a healthy future medical workforce.

In accordance with established practice in graduate healthcare education settings, enrollment in the SHIP offered through RVU's designated health insurance broker is automatic for students upon enrollment.

- Students with alternative health coverage may request a waiver (see Appendix 1) if their coverage meets the criteria outlined below.
- Aging out of parental health insurance and other qualifying events (see definitions) necessitate immediate enrollment in the Student Health Insurance Plan.

Acceptable Health Care Coverage

Health Care Coverage for students must be provided through a Patient Protection and the Affordable Care Act (PPACA) compliant individual or employer health plan that meets minimum federal requirements for coverage. Such a plan may not limit any coverage to a single state of residence, but must provide coverage across the United States that, at a minimum:

- Provides the Essential Minimum Benefits required by the PPACA with no annual limits;
- Contains no exclusions for pre-existing conditions;
- Covers 100% of Preventive Care as defined by the PPACA;
- Has an Out-of-Pocket Max of \$9,200 or less for an individual or \$18,400 or less for a family plan.

Minimum Benefits: A comprehensive package of benefits and services in a PPACA compliant health care must include:

- Ambulatory patient services

- Emergency services
- Hospitalization (such as surgery)
- Pregnancy, maternity, and newborn care (care for a mother and baby before and after the baby is born)
- Mental health and substance use disorder services, including behavioral health treatment, counseling and psychotherapy
- Prescription drugs
- Rehabilitative and habilitative services and devices
- Laboratory services

Health Care Coverage which does not meet the requirements of this policy:

1. **Short-term limited duration plans** (see definitions)
2. **State Medicaid coverage**
Each state has its own eligibility requirements for Medicaid; thus, it cannot be easily transferred between states. Furthermore, Medicaid coverage is generally limited to the state in which the individual enrolled in the coverage resides; thus, students who
 - a. travel outside of the issuing state for conferences or travel-based experiences
 - b. study outside of the issuing state or
 - c. engage in clinical rotations outside of the issuing state
 cannot depend on Medicaid coverage when they are not physically present in the issuing state. (Source: Medicaid.gov)
3. **HMOs or other limited network plans;** especially those which do not provide guaranteed coverage outside the plan's home state or network

For the reasons above, the following students will not be permitted to waive the student health insurance plan (SHIP) with Medicaid, even if the Medicaid policy is issued in the state of the RVU campus in which they are enrolled:

- **Students participating in clinical rotations**
- **Students participating in other travel-required educational activities** (Tracks or elective courses requiring travel that academic year, conference attendance/participation, Cut-Suit Week, research activities which require travel)

ROLES & RESPONSIBILITIES

Financial Aid Account Specialist	Ensure students are aware of and understand RVU health insurance requirements and deadlines, including providing access to waiver forms and policy information and requirements. Support RVU's designated health insurance broker in maintaining compliance with the policy and handling administrative actions when needed. Oversee the student insurance appeal process by reviewing submitted appeals in coordination with the designated appeals committee (this includes verifying documentation, ensuring alignment with waiver criteria, and issuing final decisions in a timely manner).
RVU designated health insurance broker (3rd party)	Administer the student health insurance program. Ensure that all students maintain valid health insurance coverage; review and approve all waiver submissions to ensure compliance with RVU's health insurance requirements. Re-verify all approved waivers quarterly; may conduct random checks of waived

	policies for compliance. Notify students of non-compliance and handle retroactive enrollment when necessary.
Students	<p>Maintain continuous health insurance coverage, either through the RVU Student Health Insurance Plan or an approved waiver. Submit waivers by posted deadlines and ensure that their insurance meets RVU's waiver requirements. Maintain health insurance enrollment, reporting any loss of coverage, and responding to notifications of non-compliance within the specified time frame. Check university email regularly for insurance-related communications.</p> <ul style="list-style-type: none"> ▪ Students must sign an acknowledgement of understanding to enroll at RVU, and again before clinical rotations and sign the Health Insurance Acknowledgment to confirm they understand their responsibilities. Student Health Insurance Acknowledgment

RELATED PROCESSES, PROCEDURES, AND/OR DEFINITIONS

Appendix 1: Waiver Requests

Appendix 2: Additional Information

Definitions:

ACA-Compliant Coverage: A health insurance plan that meets the minimum essential coverage standards outlined by the Affordable Care Act (ACA), including access to non-emergency care nationwide and no lifetime benefit caps.

Appeals Process: A procedure allowing students to challenge waiver denials within 7 calendar days. Requires written justification and supporting documentation. Reviewed by Student Financial Services in coordination with HSAC.

Continuous Coverage: Insurance coverage that remains active without any lapse from matriculation through the end of enrollment, including summer and holiday periods.

Essential Minimum Benefits: A comprehensive package of benefits and services that must be included in a PPACA compliant health care, including:

- Ambulatory patient services
- Emergency services
- Hospitalization (such as surgery)
- Pregnancy, maternity, and newborn care (care for a mother and baby before and after the baby is born)
- Mental health and substance use disorder services, including behavioral health treatment, counseling and psychotherapy
- Prescription drugs
- Rehabilitative and habilitative services and devices
- Laboratory services

Health Sciences Assurance Consulting (HSAC): RVU's third-party health insurance administrator, responsible for waiver review, compliance verification, and policy audits.

Open Enrollment Periods: Designated windows in fall and spring during which students may enroll in or waive coverage for the academic year or spring term, respectively.

Short Term Limited Duration Plans: Health insurance coverage provided pursuant to a contract with an issuer that has an expiration date specified in the contract (taking into account any extensions that may be elected by the policyholder without the issuer's consent) that is less than 12 months after the original effective date of the contract. Such plans include policies for foreign students studying for only one or two semesters in the U.S.

Qualifying Life Event (QLE): A change in your situation — like getting married, having a baby, or losing health coverage — that can make you eligible for a Special Enrollment Period, allowing you to enroll in health insurance outside the yearly Open Enrollment Period. [Qualifying life event \(QLE\) - Glossary | HealthCare.gov](#)

Most encountered QLEs are:

1. loss of health insurance coverage

2. changes to household (e.g marriage, childbirth, death)
3. residency changes

Waiver: A formal request submitted by a student to opt out of the University-sponsored health insurance plan.

POLICY REVISION HISTORY

08/21/2025 Added more information about Medicaid and Waivers to Health Plan

06/02/2025 Revised. Added Definitions

11/20/2024 Policy Created

APPENDIX 1: REQUESTS TO WAIVE STUDENT HEALTH INSURANCE PLAN (SHIP) COVERAGE

To qualify for a waiver, the student's health insurance must meet RVU's waiver requirements, which are identified in this policy and are listed on the health insurance portal available on the Financial Aid website.

Students are not required to re-submit waivers annually; RVU's SHIP broker will annually review all existing waivers. Students may access the electronic waiver/enrollment forms and policy brochure on the RVU Student Health Insurance Portal at <https://app.hsac.com/rvu>, or via the MyVista Financial Aid page.

- If a student's insurance is deemed non-compliant or inactive, RVU may retroactively enroll the student in the SHIP and charge the student's account for the applicable premium. The student will be notified via email and will have 14 calendar days to respond before automatic enrollment occurs.
- Students with approved waivers whose accepted policy is set to expire prior to the end of the policy year (July 31st annually) will be enrolled in the SHIP unless during open enrollment a new waiver request is submitted or if a qualifying event has occurred.
- If an acceptable waiver is not received by the posted deadline through the Student Insurance Portal, RVU's SHIP will enroll students without waivers in the student health insurance plan. Once enrollment in the student health insurance plan is finalized, students will no longer be eligible for a refund of the fall premium and will also be responsible for the spring premium.

Acceptable Waivers: The student health insurance plan (SHIP) offered through RVU's designated health insurance broker may be waived only with the following:

- Individual, spouse, or parent (student must be <age 26) employer group plan
- Proof of unlimited major medical coverage, unlimited lifetime benefits, unlimited office visits, coverage for an annual exam, prescription coverage, mental health coverage, wellness coverage (preventative care)
- VA Benefits
- COBRA
- Medicaid policies issued by the state of the RVU campus in which the student is enrolled (Colorado, Montana, or Utah) may be considered as acceptable waivers only for the following students, provided they do not intend to travel for research, conference, elective courses, or other University-related purposes:
 - First-year and second-year Doctor of Osteopathic Medicine students
 - First year Doctor of Nurse Anesthesia Practice students
 - Master of Science in Biomedical Science students
 - Master of Medical Science students

Appeals: If a student disagrees with a waiver denial, they may submit a formal appeal within seven (7) calendar days of receiving the denial notification. The appeal must include:

- A written explanation outlining the basis for the appeal.
- Supporting documentation from the insurance provider showing how the plan meets RVU's published waiver criteria.
- Any additional information the student believes is relevant to their case.

Appeals will be reviewed by RVU Student Financial Services in collaboration with the SHIP. A final decision will be communicated to the student via email within five (5) business days of receiving all required

documentation. All appeal decisions are final.

- International students are not eligible to waive the RVU Student Health Insurance Plan.

If a previously approved waiver is later found to be non-compliant due to policy changes, plan limitations, or loss of coverage, RVU reserves the right to retroactively enroll the student in the RVU-sponsored student health plan and charge the student account for the pro-rated or full premium, depending on the period of uncovered time. The student will be notified and given 14 calendar days to respond or submit updated documentation. Failure to respond will result in continued enrollment in the SHIP and a financial hold if the balance remains unpaid.

APPENDIX 2: ADDITIONAL INFORMATION**A. Insurance Requirement and Coverage Options:**

RVU requires all students to maintain continuous, ACA-compliant health insurance coverage throughout their enrollment, including summer and holiday breaks. This requirement may be satisfied through enrollment in the University-sponsored Insurance Plan or by submitting a valid waiver with documentation of alternative, ACA-compliant domestic coverage that meets RVU's requirements.

B. Automatic Enrollment, Premium Billing, and Waiver Deadlines:

All students are automatically enrolled in the RVU health plan unless an approved waiver is submitted by the deadline posted on the RVU Student Insurance Portal. The full annual premium is billed once at the start of the fall semester and included in the student's Cost of Attendance. No additional premium is billed in the spring. Students in programs that begin or end off-cycle are offered prorated insurance plans.

RVU offers two open enrollment and waiver periods each academic year: one in the fall and one in the spring. If a valid waiver is not submitted and approved by the fall deadline, the student will be enrolled in the plan for the full policy year and will not be eligible for a refund of the fall semester premium.

Failure to comply with this policy may result in administrative actions, including registration holds, removal from classes or clinical rotations, and, in cases of continued non-compliance, dismissal from the program.

C. Coverage Period, Mid-Year Enrollment, and Medical Leave:

The RVU Insurance Plan is effective from August 1 to July 31, with the total annual premium billed at the start of the fall semester and included in the students' Cost of Attendance. This single charge covers the entire policy year; no additional premium is billed in the spring semester. However, if a student submits a waiver request that is approved before the spring semester begins, adjustments to the premium may be made accordingly. Students who age out of a parental insurance plan at age 26 may be added to the RVU health plan for the remainder of the year at a pro-rated cost.

Students who take a leave of absence during the academic year may retain coverage for the remainder of the policy year but will not be eligible for continued coverage the following year unless they re-enroll. This plan includes dental and vision benefits.

D. Spouse and Dependent Eligibility:

Spouses and dependents are not eligible for enrollment.

E. Mid-Year Loss of Coverage, Leave of Absence, and Withdrawal:

If a student loses their insurance coverage involuntarily, they must enroll in the student health plan or submit proof of new coverage within 30 days. The new coverage must begin within 24 hours of the termination of the previous plan to maintain continuous coverage. It is the student's sole responsibility to secure alternative coverage that meets RVU's requirements. Neither RVU nor its third-party administrator, HSAC, is able to assist students in locating, purchasing, or verifying alternative health insurance plans prior to submission. Students who take a leave of absence will remain on the student health insurance policy through the remainder of the policy year with the option to cancel. Students who withdraw or are dismissed from RVU will be removed from the health insurance policy as of the date of the enrollment change.

Students whose Medicaid status changes mid-year (including loss of eligibility, change of state residence, or transition to clinical rotations) must notify the Financial Aid Account Specialist within 14 calendar days and will be enrolled in the SHIP at a pro-rated premium unless they secure alternative qualifying coverage.

F. Premium Refunds and Ongoing Waiver Compliance:

Students are not eligible for a refund after the first 31 days. If a student withdraws and RVU requests a termination date other than the end of the policy year, the student may be terminated based on the withdrawal date. The student cannot be retroactively termed, nor can they have claims beyond the termination date. If the student is allowed to terminate earlier than the end of the policy year, it is possible that RVU may refund the student for the prorated amount of premium not required.

For students with Medicaid, individual plans may qualify for waivers if they meet RVU's waiver requirements. All approved waivers will be verified by RVU's third-party administrator, Health Sciences Assurance Consulting (HSAC). In addition, random audits of waived policies may be conducted at any time to ensure continued compliance.

If a previously approved waiver is later found to be non-compliant due to policy changes, plan limitations, or loss of coverage, RVU reserves the right to retroactively enroll the student in the RVU-sponsored student health plan and charge the student account for the pro-rated or full premium, depending on the period of uncovered time. The student will be notified and given 14 calendar days to respond or submit updated documentation. Failure to respond will result in continued enrollment in the student health plan and a financial hold if the balance remains unpaid.

G. Access to Forms and Resources:

Students can access the electronic waiver/enrollment forms and policy brochure on the RVU Student Health Insurance Portal at <https://app.hsac.com/rvu>, or via the student portal Financial Aid page.

H. Privacy and HIPAA Compliance:

RVU is committed to protecting the privacy of students' personal and health-related information in compliance with the Health Insurance Portability and Accountability Act (HIPAA) and the Family Educational Rights and Privacy Act (FERPA), as applicable. Health insurance documentation submitted through the waiver portal or appeals process is handled confidentially and stored securely by Health Sciences Assurance Consulting (HSAC) and designated RVU staff. Access to health-related records is limited to personnel directly responsible for administering the student health insurance policy, processing waivers, or enforcing compliance. No health information will be shared outside of this scope without written consent from the student, unless required by law.