

Oregon Department of Consumer and Business Services Division of Financial Regulation, Bulletin No. DFR 2025-6

To: All entities offering health benefit plans

Date: September 17, 2025

RE: Coverage of COVID-19 Vaccination

Purpose:

The bulletin clarifies the division's expectations around the coverage of COVID-19 vaccination by health benefit plans in Oregon in accordance with Bulletin No. DFR 2021-1.

Background:

On January 27, 2021, pursuant to ORS 743A.264, the Oregon Health Authority issued the public health director's determination (OHA public health determination) stating that there exists a COVID-19 disease outbreak and that vaccination is necessary to prevent the spread of COVID-19. ORS 743A.264 prohibits health benefit plans from restricting coverage for the cost of necessary treatments, vaccines, immunizing agents, pharmaceutical agents, medical supplies or other prophylactic measures approved by the U.S. Food and Drug Administration (FDA) that the public health director deems necessary to prevent the spread of the disease.

On February 4, 2021, the Division of Financial Regulation of the Department of Consumer and Business Services (DFR) issued Bulletin No. DFR 2021-1 to provide guidance to insurers regarding the division's expectations for coverage in accordance with ORS 743A.264 and the OHA public health determination issued on January 27, 2021.

On September 3, 2025, Governor Tina Kotek announced, with the Governors of California and Washington, the launch of the West Coast Health Alliance (WCHA). The state of Hawaii joined the Alliance on September 4, 2025. Through this Alliance, the states will coordinate health guidelines by aligning immunization recommendations informed by trusted national medical organizations. The Alliance issued the WCHA 2025-2026 Respiratory Virus Season Immunization Recommendations that include COVID-19 vaccine recommendations.

Guidance for health benefit plans

The division reiterates its expectations that coverage for COVID-19 vaccines must be provided in accordance with Bulletin No. DFR 2021-1 and emphasizes the following:

- All health benefit plans (including grandfathered health benefit plans) in Oregon must provide coverage for FDA-approved COVID-19 vaccines and their administration in accordance with Bulletin No. DFR 2021-1.
- The requirement to cover vaccines and their administration under Bulletin No. DFR 2021-1 is in addition to any coverage requirements that may apply to a health benefit plan under state or federal law.
- A health benefit plan may not impose any cost sharing requirements, such as a copay, coinsurance, or deductible, or restrict coverage to in-network providers in accordance with Bulletin No. DFR 2021-1.

This bulletin takes effect immediately.



TK Keen, Administrator
Interim Insurance Commissioner
Division of Financial Regulation
Department of Consumer and Business Services

9/17/2025

Date