

## Public Comments

**From:** [Jeff Von Allmen](#)  
**To:** [MELLOR Joel \\* PERS](#)  
**Subject:** Public Comment on Updates and clarifications to the PERS Health Insurance Program (PHIP)  
**Date:** Tuesday, June 23, 2026 8:49:45 AM

We are writing in support of the proposed changes to PHIP OAR 459-035-0070. Specifically, the changes to (1)(g) (A thru E) as in regards to a retiree's Eligible Spousal Enrollment. The current rule as written requires an eligible spouse to enroll in PHIP at the same time as the retiree regardless of the eligible spouse's current employment or health insurance coverage. It requires an eligible spouse who may have other (possibly better) health insurance coverage i.e., an employer sponsored health plan, to enroll in a PHIP plan or forever become ineligible for PHIP.

We strongly urge the Board to vote for the proposed changes to OAR 459-035-0070.

Sincerely,

Jeffery and Jaylene Von Allmen

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**From:** [Crooks, Amy L](#)  
**To:** [MELLOR Joel \\* PERS](#)  
**Subject:** Regarding Rulemaking to Update PHIP Enrollment (OAR 459-035-0070)  
**Date:** Thursday, June 25, 2026 9:05:10 AM

Hi Joel,

The proposed updates seem fair and consistent. I have some concern that the option to enroll after loss of other group coverage could be interpreted too literally. Current language says "...if covered under another group health insurance plan for 24 consecutive months..." I think the intent is better met with language that says "...if covered under another group health insurance plan for 24 consecutive months **or more...**"

I am hoping the board opens up a special enrollment opportunity following the rule update. I have several clients who have been denied coverage since the transition to the Third Party Administrator even though they meet current enrollment requirements. For example, I have a legal spouse of a PERS retiree who is already covered under PHIP (Medicare). She is turning 65 next month and is enrolled in Medicare Part A and B. Her PHIP application has been denied twice stating that she her only enrollment opportunity was when her PERS retiree spouse enrolled in PHIP. She was not 65 at that point and was covered under group health insurance by an employer. I have another spouse who is married to a PERS retiree who is turning 65 in August. His wife is not yet eligible for Medicare (she is still covered by her former employer's group health insurance as a part of her retiree benefits). He has been denied coverage even though he is enrolled in Medicare Part A and B and is the legal spouse of a PERS retiree.

I could go on. This issue happened about five years ago (my sense was that there was a new manager

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who was misunderstanding the intent of the rules) but was quickly corrected. It has started again since PHIP started working with the new Third Party Administrator. This new interpretation is causing quite a bit of dismay and stress for your retirees and their families. And is limiting potential enrollees which affects negotiations with your providers.

I would welcome the opportunity to speak more on this if it is helpful. The PERS Health Medicare plans are excellent and I am a huge advocate. Until this recent hiccup, our firm assists an average of 120 PERS members and spouses with PHIP applications every year. This coverage and consistent access is incredibly important.

Thank you for your consideration,

Amy

Amy Lundy Crooks  
LPL Financial Advisor

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