



## **SB 2348**

Senate Industry, Business, and Labor

February 4, 2025

Katie Fitzsimmons, Director of Student Affairs, NDUS

701-328-4109 | [katie.fitzsimmons@ndus.edu](mailto:katie.fitzsimmons@ndus.edu)

Chair Barta and members of the Senate Industry, Business, and Labor Committee, my name is Katie Fitzsimmons and I serve as the Director of Student Affairs for the North Dakota University System. I am here today on behalf of the North Dakota University System and its eleven institutions to provide testimony in opposition related to SB 2348 and enlighten the committee about the current policy used throughout the North Dakota University System regarding health insurance.

Currently, there is no widespread requirement for students to carry health insurance for the purposes of enrollment. According to data we have from our American College Health Association-National College Health Assessment (ACHA-NCHA; collected in February 2024), 96.2% of our students reported carrying health insurance in some form, whether that was insurance through their parents, themselves, their spouse, or other sponsorships.

For some sectors of students, health insurance may be a requirement. This would apply to our student athletes and students enrolled in particular fields of study (such as healthcare). One campus reported to me that they currently accept participation in a health care sharing ministry program as health insurance for students that fall into these categories, in which case, we do not see much need for this bill to codify what we already practice. However, when it comes to our international students, we have stringent health insurance requirements ([SBHE Policy 505](#)), and health care sharing ministries cannot meet these conditions; thus we oppose this bill or respectfully request an amendment in regard to international students.

International students arrive on our campuses through authorizations through different types of visas. Students on J visas have very specific requirements for health insurance coverage to maintain their visa. These requirements set by the US Department of State include: medical benefit coverage of at least \$100,000 per accident or illness; at least \$50,000 for medical evacuation to their home country; at least \$25,000 for repatriation of remains in the event of death; no more than a \$500 deductible; and copayments of no more than 25%. These requirements are not negotiable; if a student does not have health insurance that hits these requirements, their visa will be terminated. If this bill were to pass, we would have state law in direct conflict with federal regulation.

In the instances of other types of visas (F or M), the Department of State does not set health insurance requirements but the North Dakota University System bases requirements for those students off the requirements for J visa students. Further, we have experienced several unfortunate worst-case scenarios with international students who were uninsured or under-insured. In my experience of working with the campuses and the 1301 individuals currently enrolled on the health insurance plan that the NDUS brokers with United Healthcare, allowing a student to intentionally enroll on a plan that is explicitly defined in the bill as “not insurance” would be misleading and possibly detrimental to the students’ ability to remain healthy and enrolled.

From November 11, 2021-January 11, 2024, there were 25 claims on our United Healthcare plan that were a minimum of \$30,000. The claims ranged from \$30,721-\$146,880 each for a total of \$1,932,859; an average of \$74,340 a month for the time period in which they occurred. Many of these were caused by unforeseen accidents or situations. Allowing international students to participate in a healthcare ministry plan to take the place of their insurance requirement would be misleading not only for medical expenses they would need to cover for themselves, but the liability of other people’s costs they would incur by signing onto one of these groups.

Prior to enrolling at one of our institutions, international students must complete an I-20 form which details the required and anticipated costs to attend one of our institutions. Further, those students must provide proof that they have funding on hand to cover those costs and by signing the form, they acknowledge the charges that will appear on their bill. Health insurance is included in those costs. Our plan right now costs \$2369 per year; \$896 for the fall semester; \$863 for the spring semester; and \$610 for the summer term. We have a waiver process available if students have alternative coverage through an employer or spouse. The piece that is most commonly not found on other health insurance plans is what is called the “MER” coverage: medical evacuation and repatriation of remains. Should the worst occur, that coverage is imperative. Costs associated with these needs quickly climb into the tens of thousands of dollars and either the institution or local medical facility could be on the hook for these costs if the student is out of the country and unreachable.

While I am not wholly familiar with what health care ministries can cover for individuals, they are ultimately not insurance and would leave our international students with not enough coverage and a pile of bills to pay for others. We would ask for an amendment to the bill for this coverage to exclude international students.

This concludes my testimony related to SB 2348. I stand for questions from Committee members.



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**NORTH DAKOTA  
STATE BOARD OF HIGHER EDUCATION  
Policy Manual**

Policy: 505 International Student Health Insurance

Effective: October 29, 2020

1. All international students enrolled at any NDUS institution shall carry the group health and accident insurance plan approved by the Chancellor beginning on or before the date they commence studies and lasting until termination or completion of their studies.

a. “International students” for the purposes of this policy means students having non-immigrant status for the primary purpose of studying in the United States, including any students holding a student category J, F, or M visa who are enrolled at an NDUS institution.

b. For students in J-1 or J-2 status, the approved plan must also meet the minimum requirements for health insurance plans established by the United States department of state for exchange visitors and the student’s institution.

c. The NDUS contracts with a third-party student health insurance provider. Terms, conditions, and refunds are within the purview of the insurance provider.

2. Waivers are only granted in exceptional circumstances. Further, waivers are granted by each institution and are subject to the criteria for comparable coverage outlined by procedure.

3. In addition, the Chancellor may by procedure exempt students who are citizens of countries with a mandatory national health plan (or are otherwise eligible for coverage by such a mandatory national health plan), if:

a. The mandatory national health insurance plan covers all students who are citizens of that country (or who are otherwise eligible for coverage);

b. The mandatory national health plan covers students studying in the United States; and

c. The coverage provided by the mandatory national health insurance plan is comparable to the plan required by this policy and immigration visa standards.

Reference: NDUS Procedure 505