

## MIKE CAUSEY INSURANCE COMMISSIONER

## **BULLETIN**

## BULLETIN Number 25-B-11

**To:** All Insurance Companies and other Entities Licensed under Chapter 58 of

the Noth Carolina General Statutes

From: Life & Health Division

The North Carolina Department of Insurance

**Date:** August 29, 2025

**Subject:** Short-Term Limited Duration Health Insurance Policies

This bulletin is to advise all carriers writing accident and health insurance that the current definition for short-term, limited duration-insurance in 45 C.F.R. § 144.103 remains the definition for short-term limited duration (STLD) health insurance in North Carolina. No STLD product regulated by the Department of Insurance may be offered in North Carolina that does not comply with the standards set by the current federal rule. This does not affect any policy issued to a consumer under a prior version of the rule.

North Carolina defaults to the federal definition of short-term limited-duration insurance. In several statutes, our definition references the definition contained in Part 144 of Title 45 of the Code of Federal Regulations (see G.S. §§ 58-3-178, 58-3-225, 58-68-25). The Department of Insurance is aware of the August 7, 2025, statement from the U.S. Departments of Labor, Health and Human services and the U.S. Treasury saying that they intend to start the rulemaking process to change the current definition, that it will not prioritize enforcement actions for violations of the current rule, and encourages states to adopt a similar approach to enforcement. This statement of non-enforcement does not change what the current law is. Because North Carolina statutes are tied to the federal definition and because the current definition in 45 C.F.R. § 144.103 is and will remain the law until a new rule has been finalized, the Department of Insurance will continue to follow the federal definition for short-term, limited-duration insurance.

Please refer any questions regarding this bulletin to the attention of Ted Hamby at <a href="mailto:LHInbox@ncdoi.gov">LHInbox@ncdoi.gov</a>.