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Legal Division

BULLETIN NO. 2025-08

TO: All Health Insurance Companies, HMOs, and Other Interested Parties

RE: Federal Changes to the Enforcement of Short-Term Limited Duration Plans

Allowing the Sale of Policies for up to Three Years In Duration

FROM: Glen Mulready, Insurance Commissioner

DATE: September 17, 2025

On August 7, 2025, the U.S. Departments of Labor, HHS, and Treasury (hereinafter, the "Federal Departments") issued a statement that the Federal Departments do not intend to prioritize enforcement actions for violations related to failing to meet the definition of Short-Term Limited Duration Insurance (STLDI) related to the 2024 rules that established a three month duration, with one month renewal duration, on these policies. Acting on this guidance, the Oklahoma Insurance Department ("OID") is authorizing carriers and producers that sell STLDI to follow the durations set forth under Oklahoma statute as follows:

36 O.S. § 4419(A): "For the purposes of this section "short-term, limited-duration insurance or "STLDI" means individual health insurance coverage provided pursuant to a contract with an insurer that has an expiration date specified in the contract that is less than twelve (12) months after the original effective date of the contract and, taking into account renewals or extensions, has a duration of no longer than thirty-six (36) months in total."

Effective immediately, and until further guidance from the Federal Departments, the OID will allow authorized carriers to sell STLDI plans in a manner consistent with the statutory language referenced above. However, pursuant to 36 O.S. § 4419(G), carriers must receive approval from the OID to sell these plans under the duration guidelines set out above through the **SERFF** filing process.

Producers who sell STLDI should check with their appointed carriers to confirm that these policies are in compliance with regulatory requirements.

Questions concerning this bulletin should be directed to Mike Rhoads, Deputy Commissioner of Life & Health, by telephone at (918) 295-3702 or by email at Mike.Rhoads@oid.ok.gov.