

Publications

July 17, 2025 • Updates

New Reporting Requirements for TPAs, PBMs and Insurers in Indiana

Key Takeaways:

- Beginning July 1, 2025, PBMs, TPAs and insurers in Indiana must annually report certain ownership information to the Indiana Insurance Department.
- The Department's website states that information is due no later than August 30th of each year.
- Disclosures must include any party with 5%+ ownership, controlling interest or private equity involvement along with identifying details.
- A \$1,000 daily penalty may apply for late filings.
- These requirements reinforce the need for timely and accurate ownership reporting.

The Indiana Insurance Department (Department) recently issued two bulletins (Bulletins 278 and 279) regarding new reporting requirements for TPAs, PBMs and insurers doing business in Indiana. Specifically, beginning July 1, 2025, and annually thereafter, all PBMs, TPAs and insurers must file a report with the Department that includes the following ownership information:

1. The name of each person or entity that has an ownership interest of at least 5% In the PBM, TPA or insurer;
2. A controlling interest in the PBM, TPA or insurer;
3. An interest as a private equity partner in the TPA, PBM or insurer.

With respect to each person or entity identified in the above categories, the report must include the following information:

1. The individual's or entity's business address;
2. Business website;
3. Applicable identification numbers for the individual or entity, such as an Employer Identification Number (EIN), Taxpayer Identification Number (TIN), National Provider Identification Number (NPI), CMS Certification Number (CCN) or National Association of Insurance Commissioners (NAIC) Identification Number.

Bulletin 278 also provides that the Department may assess a monetary penalty of \$1,000

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Related Capabilities

- Insurance
- Third Party Administrator (TPA) Licensing & Compliance Services

per day for which a report is past due. However, Bulletin 279 stated that a grace period is being provided for submitting these reports. Bulletin 279 also provided a link to its Ownership Reporting website, which now states that information must be submitted prior to August 30th of each year. Copies of Indiana Insurance Department Bulletins 278 and 279 are attached here and here.

For More Information on Our Insurance Regulatory Team

Polsinelli's Insurance Regulatory team provides a number of services to TPAs, PBMs, insurers, and other entities licensed and regulated by state insurance departments. Our services include licensing, assistance with audits, government examinations and investigations, drafting administrative services agreements and a myriad of other regulatory and compliance services. Our insurance team includes former state insurance regulators, former in-house counsel for TPAs and insurance agencies and attorneys who are currently members of the Federation of Regulatory Counsel, which provides our insurance clients with significant experience to help navigate complex regulatory challenges efficiently.

By leveraging its extensive experience representing TPAs, PBMs and insurers, our insurance team helps clients avoid the learning curve and related cost implications that can be experienced by working with companies or attorneys less familiar with the regulatory and compliance needs of TPAs, PBMs and insurers.

For questions regarding these Indiana Insurance Department bulletins or any other regulatory and compliance matter, please contact one of the authors, a member of Polsinelli's insurance team or your Polsinelli attorney.