

Third Party Administrator (TPA) Licensing & Compliance Services

Polsinelli's Insurance Business and Regulatory group has significant experience representing third party administrators (TPAs) on a national basis regarding a variety of business and compliance issues. The group includes attorneys who were formerly in-house counsel for TPAs as well as attorneys who were formerly insurance regulators. Additionally, several of our attorneys are also members of the Federation of Regulatory Counsel.

Our experience in the third party administrator industry is demonstrated by these representative examples:

- National and multistate TPA licensing projects, including off-shore entities located in India and the Philippines seeking licensure as a TPA in the United States.
- Assist clients with business, regulatory and compliance matters associated with mergers, acquisitions, and divestures involving entities licensed as a TPA.
- Multistate research regarding the statutory exemptions to the TPA licensing and regulatory requirements.
- Negotiate and draft Administrative Services Agreements and subcontract, including assistance with statutorily-mandated provisions and business provisions.
- Assistance in developing a TPA Regulatory Addendum designed to comply with the statutorily-mandated provisions applicable under the TPA laws on a national basis.
- National and multistate Pharmacy Benefit Manager (PBM), Adjuster and Insurance Producer licensing projects.
- Multistate Service Company licensing projects involving the administration of workers' compensation coverage.
- Assist clients with TPA, PBM, Adjuster, Insurance Producer or Service Company renewals and annual report filings.
- Assistance with ancillary state filing and registration requirements such as All-Payer Claims Databases and Vaccination Assessments.
- National research regarding the reviews and on-site audits insurers are required to perform with respect to their TPA business partners.
- Research and analysis regarding exemptions to the TPA licensing and regulatory requirements.
- Assistance with questions and issues that arise under The Employee Retirement Income Security Act (ERISA), The Health Insurance Portability and Accountability Act (HIPAA), and The Patient Protection and Affordable Care Act (ACA).
- Monitor regulatory and legislative activity affecting our TPA clients and provide periodic reports regarding such activity.
- Assistance with inquiries and formal regulatory actions brought by state insurance departments and attorney general offices.
- Attend industry meetings, including meetings held by the National Association of Insurance Commissioners (NAIC), National Conference of Insurance Legislators (NCOIL), Insurance Regulatory Examiners Society (IRES), Association of Insurance Compliance Professionals (AICP), and Securities & Insurance Licensing Association (SILA).

Polsinelli's Insurance Business and Regulatory group stays apprised of TPA industry trends and emerging TPA regulatory and compliance issues, publishes a newsletter and distributes eAlerts that are solely dedicated to the TPA industry. To subscribe to future TPA updates and eAlerts, please email TPA@polsinelli.com.

Publications

May 12, 2026

Louisiana Insurance Department Issues Bulletin Emphasizing TPA Due Diligence Obligations Regarding Unlicensed Insurance Entities

March 9, 2026

Missouri Attorney General Files Suit Against Pharmacy Benefit Managers and Drug Manufacturers for Alleged Insulin Pricing Scheme

February 20, 2026

VA's Community Care Network Procurement Enters Proposal Phase

February 13, 2026

Texas Regulatory Action Underscores Insurer Accountability for TPA Compliance

December 23, 2025

Alaska Eliminates TPA Licensing Exemptions, Expanding Licensing Requirements

October 10, 2025

\$19M in Settlements Underscore Cybersecurity Risks for TPAs and Insurers

July 17, 2025

New Reporting Requirements for TPAs, PBMs and Insurers in Indiana

May 29, 2025

Florida Regulatory Action Highlights Need for Insurers to Use Licensed TPAs

May 8, 2025

Delaware Department of Insurance Launches Exams of Third Party Administrators

January 8, 2025

Kansas Insurance Department Issues Data Call to All Third Party Administrators Licensed in Kansas

July 29, 2024

CMS Changes Agent Requirements to Address Unauthorized Consumer Marketplace Enrollments

May 22, 2024

Recent Regulatory Actions Against Unlicensed Pharmacy Benefit Managers in West Virginia

May 7, 2024

Recent Regulatory Action Against an Unlicensed Insurance Administrator in Florida

February 7, 2024

Recent Regulatory Actions Against TPAs in South Dakota

January 25, 2024

Department of Labor Settles with TPA to End Cross-Plan Offsetting Practice

November 20, 2023

Department of Labor Sues UnitedHealth TPA Over Claim Denials

November 16, 2023

Louisiana Insurance Department Fines Express Scripts and Medimpact for Delayed Pharmacy Payments

November 15, 2023

Florida Proposes New Pharmacy Benefit Manager Rules

August 25, 2023

Louisiana Insurance Department Catastrophe Response Plans

August 7, 2023

Third Party Administrator & Pharmacy Benefit Manager 2023 Newsletter

May 15, 2023

Third Party Administrator and Pharmacy Benefit Manager Licensing and Compliance Developments

January 31, 2023

Louisiana Insurance Department Issues Cease and Desist Orders to a TPA and the Louisiana Office of Group Benefits for Failure to Pay Rx Claims in a Timely Manner

January 20, 2023

Louisiana Insurance Department Revises and Reissues Bulletin 07-01 Regarding Catastrophe Response Plans

January 11, 2021

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January 11, 2021

TPA Claims Processing Procedures: "Sometimes Just Ok Is Not Ok"