Indiana Department of Insurance
June 10, 2025
Bulletin 278

REPORTING OF OWNERSHIP INFORMATION

This bulletin is directed to all insurers, third party administrators ("TPAs"), and pharmacy benefit managers ("PBMs"), as defined in Public Law 239-2025 (HEA 1666), doing business in Indiana. The purpose of this bulletin is to notify insurers, TPAs, and PBMs of new reporting requirements set forth in Pub. L. 239-2025.

Pursuant to Pub. L. 239-2025, beginning July 1, 2025, and each July 1 thereafter, each insurer, TPA, and PBM doing business in Indiana shall file with the Department a report that includes the following information:

(1) The name of each person or entity that has:
- (A) an ownership interest of at least five percent (5%);
- (B) a controlling interest; or
- (C) an interest as a private equity partner;

in the insurer, TPA, or PBM.

(2) The business address of each person or entity identified in item (1), above. The business address must include a:
- (A) building number;
- (B) street name;
- (C) city name;
- (D) ZIP code; and
- (E) country name.

The business address may not include a post office box number.

(3) The business website, if applicable, of each person or entity identified in item (1), above.

(4) Any of the following identification numbers, if applicable, for a person or entity identified under item (1), above:
- (A) National provider identifier (NPI).
- (B) Taxpayer identification number (TIN).
- (C) Employer identification number (EIN).
- (D) CMS certification number (CCN).
- (E) National Association of Insurance Commissioners (NAIC) identification number.
- (F) A personal identification number associated with a license issued by the Department.

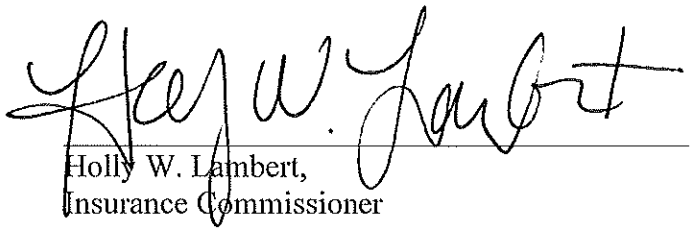
(5) The ownership stake of each person or entity identified under item (1), above.

A report provided under IC 27-1-4.5-5(a) may not include Social Security numbers of any individual. The Department may assess a fine of one thousand dollars ($1,000) per day for which a report is past due and the Department may take disciplinary action for repeat violations. The Department is providing a grace period for IC 27-1-4.5 reports due beginning July 1, 2025, while the form and manner for submission is established but may assess a fine pursuant to IC 27-1-4.5-7 for late reports in 2026.

This is the first of two (2) bulletins that will be issued notifying insurers, TPAs, and PBMs of these new reporting requirements. The second bulletin will provide further details regarding form and manner of the required reports.

Questions regarding this bulletin should be directed to compliance@idoi.in.gov.

INDIANA DEPARTMENT OF INSURANCE



Holly W. Lambert,
Insurance Commissioner