

STATE OF MICHIGAN
DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES

Bulletin 2025-22-INS

In the matter of:

**Short-Term Limited Duration Policies and
Fixed Indemnity Excepted Benefits**

Issued and entered
This 1st day of October 2025
by Anita G. Fox
Director

This bulletin supersedes Bulletin 2024-23-INS and provides guidance on updated requirements for short-term limited duration (STLD) insurance and fixed indemnity excepted benefits coverage.

Bulletin 2024-23-INS was issued to enforce the 2024 federal rule, *Short-Term, Limited-Duration Insurance and Independent, Noncoordinated Excepted Benefits Coverage*, [89 CFR 23338](#) (Final Rule). As a result of litigation, the federal government has indicated that the Final Rule's notice requirement applicable to fixed indemnity excepted benefits coverage will no longer be enforced. See [Manhattan Insurance and Annuity Co v. U.S. Department of Health and Human Services](#), unpublished final judgment of the United States District Court for the Eastern District of Texas, issued December 4, 2024 (Case No. 6:24-cv-00178). Additionally, on August 7, 2025, the federal government issued a [statement](#) that it will no longer be prioritizing enforcement of the Final Rule's requirements applicable to STLD insurance. Consequently, issuers will no longer be required to comply with the Final Rule's requirements applicable to STLD insurance and fixed indemnity plans.

Nevertheless, as stated in Bulletin 2024-23-INS, state law continues to apply. Michigan law limits the duration of STLD insurance policies to 185 days or less out of any 365-day period. See MCL 500.2213b(9). STLD insurance policies cannot be renewed to exceed that number of days, and must be issued immediately, without underwriting, upon the receipt of a completed application. *Id.* STLD insurance policies do not cover preexisting conditions and do not have to comply with the guaranteed renewability requirements set forth in Section 2213b(1)-(8) of the Insurance Code.

Consumers should be aware that STLD insurance policies do not have to comply with certain Affordable Care Act protections, including prohibitions on annual or lifetime limits, benefit mandates, protections against rescissions, and cost-sharing limitations.

The Director reviews policy forms and rates applicable to STLD insurance policies pursuant to MCL 500.2236, MCL 500.2242, and MCL 500.3474.

Any questions regarding this bulletin should be directed to:

Department of Insurance and Financial Services
Office of Insurance Rates and Forms
DIFS-OIRF@michigan.gov
530 W. Allegan Street – 7th Floor
Lansing, Michigan 48933
Toll Free: (877) 999-6442

/s/

Anita G. Fox
Director