



*2026 Spring National Meeting
San Diego, California*

REGULATORY FRAMEWORK (B) TASK FORCE

Tuesday, March 24, 2026

12:00 – 1:00 p.m.

Meeting Summary Report

The Regulatory Framework (B) Task Force met March 24, 2026. During this meeting, the Working Group:

1. Adopted its 2025 Fall National Meeting minutes.
2. Adopted its Feb. 13 joint minutes with the Health Insurance and Managed Care (B) Committee. During this meeting, the Task Force and Committee took the following action:
 - A. Adopted the Task Force’s revised 2026 charges, which included adding a new charge taken from the former Health Innovations (B) Working Group to “gather and share information, best practices, experience, and data to inform and support state flexibility options through the Affordable Care Act (ACA) and other health insurance-related policy initiatives.” The revisions also change the name of the Employee Retirement Income Security Act (ERISA) (B) Working Group to the Employee Retirement Income Security Act (ERISA) and Alternative Health Care Coverage (B) Working Group to reflect its new charge taken from the Task Force’s charges to “monitor, analyze, and report, as necessary, developments related to excepted benefit coverage, short-term, limited-duration (STLD) coverage, health care sharing ministry (HCSM) coverage, and coverage that is offered and marketed as a substitute for, or an alternative to, comprehensive major medical coverage.”
3. Received status updates on the work and 2026 planned work of its working groups: 1) ERISA and Alternative Health Coverage (B) Working Group; 2) Mental Health Parity and Addiction Equity Act (MHPAEA) (B) Working Group; and 3) Prescription Drug Coverage (B) Working Group.
4. Adopted the report of the ERISA and Alternative Health Coverage (B) Working Group, which met March 24. During this meeting, the Working Group took the following action:
 - A. Discussed comments received on the draft *Guidance Document: ERISA Preemption and State Pharmacy Benefit Manager (PBM) Laws* and next steps in developing a revised draft based on those comments.
 - B. Discussed its planned work on guidance related to level-funded plans. The Working Group decided to form a drafting group to develop an initial draft.
 - C. Discussed potential work related to its new charge to monitor, analyze, and report, as necessary, developments related to excepted benefit coverage; short-term, limited-duration (STLD) coverage; health care sharing ministry (HCSM) coverage; and coverage that is offered and marketed as a substitute for, or an alternative to, comprehensive major medical coverage. The Working Group received suggestions related to this charge from Working Group members,



interested regulators, and interested parties. The Working Group asked that any additional suggestions be submitted to the Working Group by April 30.

5. Adopted the report of the MHPAEA (B) Working Group. The Working Group plans to meet April 2 to discuss its activities for 2026.
6. Adopted the report of the Prescription Drug Coverage (B) Working Group, which met March 23. During this meeting, the Working Group took the following action:
 - A. Adopted its 2025 Fall National Meeting minutes.
 - B. Adopted its Dec. 15, 2025, minutes. During this meeting, the Working Group took the following action:
 - i. Heard a presentation from the Pharmaceutical Research and Manufacturers of America (PhRMA) on the 340B Drug Pricing Program and anticipated changes beginning Jan. 1, 2026.
 - C. Heard a presentation from the National Health Law Program (NHLP) and the HIV+Hepatitis Institute on prescription drug formularies, consumer protections, and state enforcement.
 - D. Heard a presentation from the Alabama Department of Insurance (DOI) on prescription drug discount cards and topics related to them, such as co-pay and prescription drug assistance programs and copay accumulators.
7. Heard an update on recently enacted federal PBM legislation.
8. Adopted the revised *State Flexibility White Paper*, which the Health Insurance and Managed Care (B) Committee will consider for adoption during its March 25 meeting.