

*2026 Summer National Meeting
Columbus, Ohio*

REGULATORY FRAMEWORK (B) TASK FORCE

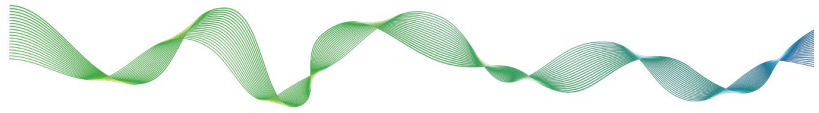
Thursday, August 13, 2026

1:00 – 2:00 p.m.

Meeting Summary Report

The Regulatory Framework (B) Task Force met Aug. 13, 2026. During this meeting, the Task Force:

1. Adopted its June 29 minutes. During this meeting, the Task Force took the following action:
 - A. Heard an update from the Blue Cross and Blue Shield Association (BCBSA), AHIP, and a panel of plan representatives on the progress related to the industry's prior authorization (PA) reform initiative announced last year. The Task Force plans to hold a follow-up meeting on Aug. 31 to hear presentations on the issue from other stakeholders and hold a question-and-answer (Q&A) session.
2. Adopted its Spring National Meeting minutes (*see NAIC Proceedings – Spring 2026, Regulatory Framework (B) Task Force*).
3. Adopted the report of the Employee Retirement Income Security Act (ERISA) and Alternative Health Coverage (B) Working Group, which met Aug. 13. During this meeting, the Working Group took the following action:
 - A. Adopted its July 22 and May 18 minutes. During these meetings, the Working Group took the following action:
 - i. Adopted its Spring National Meeting minutes (*see NAIC Proceedings – Spring 2026, Regulatory Framework (B) Task Force, Attachment One*).
 - ii. Discussed the comments received on and adopted the draft *Guidance Document: ERISA Preemption and State Pharmacy Benefit Manager (PBM) Laws*.
 - B. Discussed its planned work on guidance related to level-funded plans. A regulator-only drafting group plans to begin drafting a guidance document on level-funded plans after the Summer National Meeting. Level-funded plans are an increasingly popular arrangement, typically sold to small employers, that involves self-funding with a fixed-amount (level-funded) stop-loss policy.
 - C. Adjourned into regulator-to-regulator session, pursuant to paragraph 2 (pending investigations), paragraph 3 (specific companies, entities, or individuals), and paragraph 8 (consideration of strategic planning issues) of the NAIC Policy Statement on Open Meetings.
4. Adopted the reports of the Mental Health Parity and Addiction Equity Act (MHPAEA) (B) Working Group and the Prescription Drug Coverage (B) Working Group, which met Aug. 12 in joint session. During this meeting, the Working Groups took the following action:



- A. The Prescription Drug Coverage (B) Working Group adopted its Spring National Meeting minutes (see *NAIC Proceedings – Spring 2026, Regulatory Framework (B) Task Force, Attachment Two*).
 - B. The MHPAEA (B) Working Group adopted its April 2 minutes. During this meeting, the Working Group took the following action:
 - i. Discussed its planned work for 2026. The Working Group decided that its 2026 work would include compiling a tracking document that shows activity by state and the resources they use, such as reporting templates, to help regulators understand what is happening across states related to MHPAEA implementation and enforcement.
 - ii. Heard an update on New Hampshire’s use of reporting templates for prior authorization as a nonquantitative treatment limit (NQTL).
 - C. Heard presentations from the Center for Evidence-Based Policy and The INS Companies on medications to treat substance-use disorders and their coverage by health plans, focusing on coverage delays and state enforcement of parity requirements.
5. Adopted the *Guidance Document: ERISA Preemption and State Pharmacy Benefit Manager (PBM) Laws*, which the Health Insurance and Managed Care (B) Committee will consider for adoption during its Aug. 14 meeting.
6. Heard an update from the Robert Wood Johnson Foundation (RWJF) on individual coverage health reimbursement arrangements (ICHRA).
7. Heard an update from the federal Center for Consumer Information and Insurance Oversight (CCIIO) on its recent activities related to essential health benefits (EHBs) and the pre-enrollment income verification process.