

Short-Term, Limited-Duration Health Plans 9th Edition

		Initial Plan Duration	Initial Plan Duration Grade	Renewals?	Renewals Grade	Maximum Duration (including renewal)	Maximum Duration Grade	Stricter than the Federal standard?	Notes	Grade	Citation
Alabama	AL	364 days	F	No limit	F	36 months	F	No	No state level regulation	F	
Alaska	AK	364 days	F	No limit	F	36 months	F	No	No state level regulation	F	
Arizona	AZ	364 days	F	No limit	F	36 months	F	No		F	SB 1109
Arkansas	AR	364 days	F	No limit	F	36 months	F	No	No state level regulation	F	
California	CA	As the result of an explicit ban, underwritten short-term plans are not available in this state	A	As the result of an explicit ban, underwritten short-term plans are not available in this state	A	As the result of an explicit ban, underwritten short-term plans are not available in this state	A	Yes		A	Cal.Ins.Code § 10123.61
Colorado	CO	6 months, however, as the result of stringent regulations, underwritten short-term plans are not available in this state	A	Renewals prohibited, yet, as the result of stringent regulations, underwritten short-term plans are not available in this state	A	12 months, yet, as the result of stringent regulations, underwritten short-term plans are not available in this state	A	Yes	Colorado imposed extensive new rules for short-term plans in 2019 and as a result, there are no longer any insurers offering short-term plans in the state	A	C.R.S.A. § 10-16-102
Connecticut	CT	As the result of stringent regulations underwritten short-term plans are not available in this state	A	As the result of stringent regulations underwritten short-term plans are not available in this state	A	As the result of stringent regulations underwritten short-term plans are not available in this state	A	Yes	Starting in 2019, Connecticut began requiring short-term health plans to cover essential health benefits; and as a result, there are no longer any short-term plans for sale in the state	A	Bulletin HC 121
Delaware	DE	3 months	B	Renewals prohibited	B	3 months	B	Yes	Rules & Regulations authorizing statute 18 Del.C. § 311, 18 Del.C. § 1720, 18 Del.C. Chs. 33, 35 and 36, 29 Del.C. Ch. 101	B	18 Del. Admin. Code 1320
District of Columbia	DC	3 months	B	Renewals prohibited	B	3 months	B	Yes	DC law prevents the purchase of a second short-term plan (from the same insurer or an affiliate) unless there's at least a nine-month gap between the plans	B	DC Code § 31-3303.13d.
Florida	FL	less than 12 months	F	No limit	F	36 months	F	No	Statutory regulation	F	F.S.A §§627.6426 & 627.6525
Georgia	GA	less than 12 months	F	No limit	F	36 months	F	No	No state level regulation	F	
Hawaii	HI	91 days, however, as the result of stringent regulations, underwritten short-term plans are not available in this state	A	Renewals prohibited, yet, as the result of stringent regulations, underwritten short-term plans are not available in this state	A	Limited to 1 plan per calendar year, yet, as the result of stringent regulations, underwritten short-term plans are not available in this state	A	Yes	As a result of Hawaii's strict regulations, no short term plans have been available since October 2018	A	HB 1520
Idaho	ID	364 days for "enhanced STPs"	F	No limit on renewals for "enhanced STPs"; No renewals for standard STPs	F	"Three years for enhanced plans; Six months for non-enhanced plans"	F	Yes*	Idaho created a version of STPs referred to as "enhanced STPs" which are required to be renewable, include minimum benefits, and are eligible to be converted to an ACA-compliant plan	F	House Bill 275
Illinois	IL	181 days	C	Prohibits renewals within a period of 365 days after the policy ends	B	181 days	C	Yes	An enrollee cannot purchase a new short-term plan from the same issuer within 60 days of the termination of a previous short-term plan	C	215 ILCS 190
Indiana	IN	364 days	F	No limit, disclosure of previous short-term coverage may be required	F	36 months	F	No	Annual limit of at least \$2M	F	IC 27-8-5.9
Iowa	IA	364 days	F	No limit	F	36 months	F	No*	Insurance rules impose some requirements on short-term plans including minimum coverage requirements, OOP caps.	F	ARC 4332C Insurance Division[191]
Kansas	KS	365 days	F	One renewal period permitted	C	24 months	D	Yes		D	KRS 40-2.193
Kentucky	KY	364 days	F	No limit	F	36 months	F	No	No state level regulation of short-term health but there is regulation of short-term nursing home plans	F	Bulletin 2018-02
Louisiana	LA	12 months	F	No limit	F	36 months	F	No*		F	
Maine	ME	Combined new + prior not to exceed 24 months	F	Not within 1 year	D	24 months	D	Yes	STLD is only available under continuity of coverage circumstances; only sold in-person	D	24-A M.R.S.A. §2849-B
Maryland	MD	3 months	B	Renewals prohibited	B	3 months	B	Yes		B	MD INSURANCE § 15-1301
Massachusetts	MA	Underwritten short-term plans are not available in this state	A	Underwritten short-term plans are not available in this state	A	Underwritten short-term plans are not available in this state	A	Yes	Due to existing guaranteed issue & rating restrictions as well as the individual mandate, STLD plans have not been able to enter the MA market	A	MA Law Ch 111M

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Michigan	MI	185 days	C	Renewals prohibited	B	185 days	C	Yes	You can't have more than 185 days of short-term coverage from a single insurer within a 365 day period	C	MCL §500.2213b
Minnesota	MN	185 days, however, as the result of stringent regulations, underwritten short-term plans are not available in this state	C	Renewals prohibited, but consumers can purchase a new STP; however, as the result of stringent regulations, underwritten short-term plans are not available in this state	D	Total time enrolled in short-term plans can't exceed 365 days in any 555-day period; however, as the result of stringent regulations, underwritten short-term plans are not available in this state	D	Yes	Renewals are prohibited, but consumers are not prohibited from purchasing a new short-term plan	D	MN Commerce Department
Mississippi	MS	364 days	F	No limit	F	36 months	F	No	No state level regulation	F	
Missouri	MO	6 months	C	No limit	F	36 months	F	No	Plans can be renewed to a total of 36 months as long as each term is six months or less. See State Filing Guidelines for STPs https://insurance.mo.gov/forms/GroupShortTermMajorMedCheckCOV-2019.pdf	D	V.A.M.S. 376.1224
Montana	MT	364 days	F	No limit	F	36 months	F	No	No state level regulation	F	
Nebraska	NE	364 days	F	No limit	F	36 months	F	No	NE Insurance Filing Guidelines	F	Neb.Rev.St. § 44-787
Nevada	NV	185 days	C	Renewals prohibited, but consumers can purchase a new STP	D	185 days	C	Yes		C	NAC 689A.434
New Hampshire	NH	6 months	C	Renewals prohibited, but consumers can purchase a new STP	D	18 months total within a 2 year period	D	Yes	Additional coverage has to be a new separate plan; Plans can't be bought by anyone who had more than 540 days of short-term coverage in the past 24 months See N.H. Code Admin R. Ins 7001.01-12	D	NH Rev Stat § 415:5
New Jersey	NJ	Underwritten short-term plans are not available in this state	A	Underwritten short-term plans are not available in this state	A	Underwritten short-term plans are not available in this state	A	Yes		A	NJ Rev Stat 17B:27A-3
New Mexico	NM	3 months, however, due to stringent regulations underwritten short-term plans are not available in this state	A	Renewals prohibited and due to stringent regulations, underwritten short-term plans are not available in this state	A	3 months, however due to stringent regulation, underwritten short-term plans are not available in this state	A	Yes		A	N. M. S. A. 1978, § 59A-23G-2
New York	NY	Due to stringent regulations underwritten short-term plans are not available in this state	A	Due to stringent regulations underwritten short-term plans are not available in this state	A	Due to stringent regulations underwritten short-term plans are not available in this state	A	Yes		A	NY Insurance Circular Letter No. 7
North Carolina	NC	364 days	F	No limit	F	36 months	F	No	An individual would be considered continuously insured (with creditable coverage) if they had short-term coverage prior to enrolling in an employer-sponsored plan, as long as the short-term coverage duration wasn't more than 12 months	F	NC ST § 58-68-30
North Dakota	ND	364 days	F	No limit	F	12 months	F	Yes	Short-term plan restrictions in North Dakota were relaxed to the federal standard in 2021, but there are various state benefit mandates	F	NDCC, 26.1-36.8-01
Ohio	OH	364 days	F	Renewals prohibited	B	364 days	D	Yes		D	OH Insurance Bulletin 2018-05
Oklahoma	OK	364 days	F	No limit	F	36 months	F	No		F	36 O.S. § 4419 (OSCN 2020)
Oregon	OR	3 months	B	Renewals prohibited*	B	3 months	B	Yes	*Renewals are technically allowed, but the maximum duration is three months, including all renewals, so in practice they are prohibited	B	ORS 743B.005
Pennsylvania	PA	364 days	F	No limit	F	36 months	F	No	No state level regulation	F	
Rhode Island	RI	Underwritten short-term plans are not available in this state	A	Underwritten short-term plans are not available in this state	A	Underwritten short-term plans are not available in this state	A	Yes	STPs in are required to cover cover all essential health benefits and state-mandated benefits, and must maintain a medical loss ratio of 80%	A	Insurance Regulation 23

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South Carolina	SC	11 months	D	No limit	F	33 months	D	Yes	See S.C. Code of Regulations R. 69-34	D	SC Insurance Bulletin 2018-08
South Dakota	SD	364 days	F	No limit	F	36 months	F	No		F	ARSD 20:06:40:02
Tennessee	TN	364 days	F	No limit	F	36 months	F	No	No state level regulation	F	
Texas	TX	364 days	F	No limit	F	36 months	F	No		F	28 TAC §3.3602
Utah	UT	364 days	F	No limit	F	36 months	F	No		F	Utah Code 31A-1-301
Vermont	VT	3 months	B	Renewals prohibited	A	3 months	B	Yes	Although Vermont does not prohibit short-term plans, the benefit mandates and the requirement that plans cover pre-existing conditions make Vermont's short-term market unappealing for insurers; as a result, no insurers are selling short-term plans in Vermont (see Vt. Admin. Code 4-3-61.1-14)	A	8 V.S.A. § 4084a
Virginia	VA	3 months	B	One renewal period permitted	C	6 months	C	Yes	See 14 VAC 5-141-140	C	VA Code Ann. § 38.2-3407.21
Washington	WA	3 months	B	Renewals prohibited	B	3 months	B	Yes	New regulations prohibit renewals and prevent the sale of a short-term plan to anyone who has had 3 months of short-term coverage in the past 12 months	B	Rule 2018-01
West Virginia	WV	364 days	F	No limit	F	36 months	F	No	No state level regulation	F	
Wisconsin	WI	365 days	F	No limit	F	18 months	D	Yes	A 63 day break is required before a consumer may purchase another STP from the same insurer	F	Wisconsin Legislature: Section 632.7495(4)
Wyoming	WY	364 days	F	No limit	F	36 months	F	No	No state level regulation	F	