NATIONAL INSURANCE COMMISSION

GUIDELINES FOR THE OPERATION OF FOREIGN OR INTERNATIONAL HEALTH INSURANCE PROVIDERS PURSUANT TO THE NIGERIAN INSURANCE INDUSTRY REFORM ACT, 2025.

EFFECTIVE 31ST MARCH 2026

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1.0 PREAMBLE

1.1 The National Insurance Commission, pursuant to the powers conferred on it under the Nigeria Insurance Industry Reform Act (NIIRA) 2025 and enabling laws and regulations, hereby issues these regulatory guidelines.

1.2 No foreign or international health insurance or reinsurance provider shall conduct, market, solicit, or otherwise transact any health insurance related business in Nigeria without first obtaining the prior written approval of the Commission.

1.3 All stakeholders are required to comply with the provisions of this Guidelines.

2.0 DEFINITION OF TERMS & ABBREVIATIONS

In this Guidelines, the following definitions shall subsist unless otherwise directed:

Term	**Meaning**
Appointed Nigerian Partners	These shall comprise of: Life Insurers, Brokers, Third Party Administrators, Health Maintenance Organizations (HMOs), acting on behalf of such foreign or international health insurance providers.
The Commission	The National Insurance Commission.
IPMI-R (*International Private Medical Insurer or Reinsurer*)	Means a Foreign or International Health Insurance or Reinsurance Provider/entity incorporated outside Nigeria that offers, markets, or provides health insurance or reinsurance services or products to persons, organizations, or entities within Nigeria.
Health Insurance or Reinsurance Business	Shall mean health insurance or reinsurance-related business that includes any activity, arrangement, or transaction involving the offering, underwriting, marketing, administration, or management of health insurance products or services to persons in Nigeria, whether directly or indirectly, other than Health Insurance Schemes.
Domestic Administrator	A Third-Party Administrator, Specialized Independent Organization that performs administrative services for health insurance policies/plans.
HMO	Health Maintenance Organization.
Intermediaries	These include Brokers, Agents, HMOs.
NIIRA 2025	Nigerian Insurance Industry Reform Act 2025.

Term	Meaning
Partner	Any individual, institution or organization that collaborates with an insurance institution under a formal arrangement to deliver insurance services. Such partnership shall be formalized by written agreement and subject to the Commission's approval.
Stakeholders	These include Insurance Companies, Insurance Brokers, Third Party Administrators, HMOs.
Emanate	Businesses originating from Nigeria

3.0 OBJECTIVES OF THE GUIDELINES

The objectives of this Guidelines are to:

i. Give effect to the provision of NIIRA 2025 in respect of Health Insurance.

ii. Safeguard the rights and interests of policyholders.

iii. Promote standardization and ethical practices across the industry.

iv. Enhance financial sustainability and risk management among providers, while also promoting transparency, accountability, and consumer confidence.

4.0 SCOPE OF APPLICATION

This Guidelines shall apply to:

i. All IPMI-R providers seeking to transact, underwrite, market, or otherwise engage in any health insurance business emanating from Nigeria.

ii. IPMI-R who seek to offer services to entities registered in Nigeria or individuals residing in Nigeria.

iii. All intermediaries or authorized representatives of IPMI-R providers.

5.0 MANDATORY APPROVAL

i. No person shall transfer any health insurance risk emanating from Nigeria to any IPMI-R unless the IPMI-R has obtained the prior approval of the Commission.

ii. No IPMI-R provider shall transact any health insurance related business emanating from Nigeria without obtaining prior written approval of the Commission.

iii. If the Commission does not communicate its approval or disapproval within 10 working days of receiving a complete documentation, the application shall be deemed approved.

iv. To obtain the Commission's approval, the entity shall adopt any of the models in 6.0 below.

6.0 MODELS OF OPERATION FOR IPMI-R PARTNERSHIPS

i. Model 1 – Domestic Insurance Partnership

ii. Model 2 – Domestic Administrator or Intermediary Partnership

iii. Model 3 – HMO Partnership

6. 1 Model 1: Domestic Insurer Partnership:

a. An IPMI-R provider is authorized by the Commission to partner with a local insurer on a coinsurance or reinsurance basis. The framework shall be submitted to the Commission for approval on an annual basis.

b. The product distribution may involve a local insurance broker or direct to insurer.

c. The policy may be co-branded by both domestic insurer and IPMI-R.

6. 2 Model 2: Domestic Administrator or Intermediary Partnership:

a. The IPMI-R provider is authorized by the Commission and operates through a registered administrator.

b. The Administrator does the invoicing, premium collection, remittance and supports claims administration (especially from domestic providers).

c. The Administrator reports to the Commission on behalf of the IPMI-R provider.

6. 3 Model 3: HMO Partnerships

a. The IPMI-R provider is authorized by the Commission to partner with HMOs duly registered in Nigeria.

b. The HMO does the invoicing, premium collection, remittance and supports claims administration (especially from domestic providers).

c. The HMO reports to the Commission on behalf of the IPMI-R provider.

7.0 APPLICATION REQUIREMENTS/DOCUMENTATIONS

i. No IPMI-R provider shall directly underwrite or issue health insurance to entities registered in Nigeria, any person residing in or receiving services in Nigeria, except through an authorized representative domiciled in Nigeria.

ii. An IPMI-R provider seeking to transact health insurance related business in Nigeria shall submit an application to the Commission which shall include the following:

   a. Certificate of incorporation from the home jurisdiction.

   b. Evidence of licensing or authorization from the home jurisdiction's insurance regulator.

   c. Detailed description of the health insurance products or services to be offered which shall include types of coverage and features.

d. Business plan showing target market claims handling procedures, pricing and risk management framework.

e. Detailed premium worksheet for each product plan.

f. Submit a list of intended intermediaries and only Nigerian entities and residents may perform these roles, subject to prior approval of the Commission.

g. Model of operation.

h. Evidence of payment of the application fee as prescribed by the Commission.

i. Any other document or information, as may be required by the Commission.

8.0 PRODUCTION RETURNS

8.1 A quarterly production returns shall be submitted to the Commission in the prescribed format (see Appendix 1).

8.2 Evidence of payment to the Commission of the ISS Levy shall be submitted.

9.0 FAIR TREATMENT OF CUSTOMERS

IPMI-R providers are required to ensure fair treatment of customers throughout the duration of the insurance/reinsurance contract, which shall, amongst others, cover the following:

i. Act competently, carefully and diligently in regard to all transactions between IPMI-R providers and their customers.

ii. Advice and decisions given must prioritize the customer's interest and be professionally delivered.

iii. Develop and market products in a way that meets the customer's needs.

iv. Provide clear, simple, and accurate information on policy terms, conditions, exclusions, and benefits.

v. Provide customers with clear information before, during, and after sale.

vi. Deal with customers' complaints in a fair and impartial manner.

vii. The terms and conditions of a policy contract shall contain a claims settlement clause. The clause shall provide clear procedure for accessing health care within a reasonable timeframe.

10.0 COMPLAINT AND GRIEVANCE MANAGEMENT PROCEDURE

It shall be the responsibility of the IPMI-R providers to put in place policies and procedures for quick, fair and effective resolution of clients' complaints which shall be managed by their intermediaries or local representatives.

11.0 PENALTIES AND SANCTIONS

Any entity registered or person residing in Nigeria that transacts health insurance-related business with an IPMI-R provider without obtaining prior approval of the Commission shall be liable to a penalty not less than the total premium involved.

12.0 TRANSITIONAL PROVISIONS

i. **Compliance Deadline:** Providers must comply with the Guidelines not later than 90 days from the date of release.

ii. **Treatment of Existing Policies**: Policies issued prior to the effective date may continue until expiry.

iii. **Issuance of New Policies During Transition**: Providers may continue issuing new policies and renewals during the 90 days period, provided applications are filed with the Commission on file and use basis within the 90 days.

13.0 REJECTION OF APPLICATION

Failure to satisfy the requirements of this Guidelines shall be grounds for rejection of the application. In the case of a rejection received from the Commission, IPMI-R providers shall be mandated to suspend the issuance of new policies and renewals.

14.0 ISS LEVY

The applicant shall pay one percent (1%) of the gross premium as ISS Levy to the Commission.

15.0 EFFECTIVE DATE

i. This Guidelines shall be effective from 31st of March 2026.

ii. All insurance institutions shall comply with the provisions of this Guidelines.

16.0 ENQUIRY

Enquiries on any aspect of this Guidelines should be referred to:

Address: National Insurance Commission, Plot 1239, Ladoke Akintola Boulevard, Garki 2, Abuja.

Email: info@naicom.gov.ng

Website: www.naicom.gov.ng

TEMPLATE FOR QUARTERLY PRODUCTION RETURNS

SN	Number of Policies	Names of Policyholders	Total Premium Generated		Commission/Fee			Claims				Model of Operation	Any other Relevant Information
			N	$	Due	Paid	Outstanding with Dates	Due	Paid	Outstanding with Dates	Claims Declined and Reason for Non-Settlement		