



An tÚdarás Árachas Sláinte
The Health Insurance Authority

Inspection of obligations related to non-renewed contracts

December 2024

1. Background/Objective of the Inspection

A number of inpatient health insurance plans were closed for renewal during 2024. When a registered undertaking closes an inpatient plan for renewal, they must offer an alternative plan. The regulations governing the benefits on that alternative plan are set out in regulation 2 of Section 9 of the Health Insurance Act, 1994 (as amended) (“the 1994 Act”).

This does not apply if the registered undertaking is ceasing to sell health insurance business in Ireland.

The Health Insurance Authority (“the Authority”) inspected compliance by registered undertakings with Section 9 of the 1994 Act. This inspection was carried out in collaboration with the Central Bank of Ireland, one of whose objectives is to ensure consumers interests are secured in all respects including the non-renewal of contracts.

This inspection contributes to meeting one of the key priorities of the Authority –

HIA’s Strategic Plan 2022-2024 – Priority #2 Ensure compliance and accountability through best regulatory practice:

Ensuring compliance with the 1994 Act, particularly where it relates directly to the experiences of consumers is a key part of how the Authority meets the [Principal Objective](#) of the 1994 Act.

2. Scope of the Inspection

The inspection compared the benefits between the plans closed for renewal in 2024 and the replacement contracts being offered. A sample of inpatient private health insurance plans that were closed for renewal to policyholders during 2024 received closer examination. Hospital lists and procedure lists were examined and registered undertakings provided a walkthrough of the operation of hospital lists and procedure codes.

3. Findings and Recommendations

The Authority found no evidence that the registered undertakings did not comply with the requirements under Section 9 of the 1994 Act. The Authority found that inpatient benefits were the same, or the excess amount for inpatient benefits on the replacement contract is not greater than €100 more than the equivalent to the excess amount provided in the non-renewed contract.

The Authority noted that there were material differences in benefits between the closed cash plan and replacement plan offered. The protections in Section 9 of the 1994 Act do not apply to outpatient benefits or cash payments.

The Authority observed evidence of consideration of individual consumer journeys to ensure that no consumer would be disadvantaged at the time of closure. The Authority considers this to be best practice.

Given the broader benefit to consumers of product simplification and in line with the Authority’s strategic priority to address this, some comfort can be taken from firm’s controls and processes evidenced in the findings of this inspection.