

THOUGHT LEADERSHIP

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LEGAL UPDATES

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Missouri Joins States Expanding Health Plan Options Beyond Traditional Insurance

On July 14, 2025, Missouri Governor Mike Kehoe signed Senate Bill 79 into law, which, among other things, allows Farm Bureau to offer health plans in Missouri to Farm Bureau members. The Farm Bureau health plans operate like insurance, but they are not subject to federal or state laws regulating health insurance. The plans typically offer fewer benefits than Affordable Care Act (ACA)-compliant plans and may exclude coverage for preexisting conditions. In Missouri, the plans must cover ambulatory patient services, hospitalization, emergency services, and laboratory services, and they must have an annual limit of at least \$2 million.

Farm Bureau health plans are permitted in Arkansas, Indiana, Iowa, Kansas, Mississippi, Missouri, Nebraska, North Dakota, Texas, South Dakota, and Tennessee. Similar legislation has been introduced in Alabama, Ohio, Wisconsin, and Florida.

Proponents of Farm Bureau health plans believe the legislation fills gaps for those who would otherwise go without coverage. Critics argue these plans provide inferior healthcare coverage and lack regulatory oversight by operating outside of insurance laws.

Other options

The Farm Bureau health plans join a growing field of health insurance-like options for consumers. For example, many states permit healthcare sharing ministries, organizations in which members typically share a common set of ethical or religious beliefs and members agree to make payments to—or share—the medical expenses of other members. Healthcare sharing ministries do not involve a contractual guaranty of payment of health claims and are

carved out from state and federal health insurance laws. Like the Farm Bureau plans, healthcare sharing ministries are not required to pay for pre-existing conditions, and they are not required to cover what is considered “essential health benefits” under the ACA.

Neither is subject to the guaranty association system and protections. This means in the event of an insolvency, there is no guaranty association protection to guarantee payment of member health claims.

Regulatory framework

Although healthcare sharing ministries and Farm Bureau health plans are not subject to most insurance laws, they may be subject to state consumer protection statutes. In addition, insurance regulators have challenged healthcare sharing ministries on grounds that the ministries are operating like an insurer but without an insurance license and outside the scope of insurance regulation.

Contact Us

If your enterprise is engaged in offering—or is contemplating offering—health insurance-like products or benefits and you have questions regarding Missouri Senate Bill 79, please contact Kirsten Byrd, Katie Griffin, or your Husch Blackwell attorney.