



Illinois Department of Insurance

JB PRITZKER
Governor

ANN GILLESPIE
Director

TO: All Health Insurance Issuers Writing Accident and Health Insurance and Health Maintenance Organization Health Care Plans

FROM: Ann Gillespie, Director *ARG*

DATE: December 31, 2025

RE: Company Bulletin 2025-23 – Uniform Directory Template

Under Public Act 103-0650,¹ the Department issues this Company Bulletin to provide guidance to health insurance issuers subject to Section 55 of the Network Adequacy and Transparency Act (“NATA”) and delineate their obligation to implement the Uniform Electronic Provider Directory Information Forms (“Uniform Directory Template”). Issuers must make the Uniform Directory Template available to onboarding, current, and terminating providers so that preferred providers can ensure their information is accurate and up-to-date with the issuer and to ensure consumers have access to correct provider directory information.

After considering feedback received during the meetings of the Uniform Electronic Provider Directory Information Form Task Force this year, the Department is adopting a Uniform Directory Template that draws substantially on the Universal IAMHP Roster Template, which managed care organizations use to gather information from health care providers participating in the Illinois Medicaid program. The Uniform Directory Template is attached to this bulletin as an Excel workbook, but issuers may implement the template as a PDF or through a web portal that requests the same information.

Beginning July 1, 2026, all providers must use the Uniform Directory Template to notify issuers of their provider directory information as required by 215 ILCS 124/25 and 42 U.S.C. § 300gg-139.

Section 55(b) of NATA states: “Issuers shall accept this form as sufficient to update their provider directories.” 215 ILCS 124/55(b). This means that, for the purpose of updating NATA-regulated provider directories, an issuer must not require a provider to supply information outside of what the Department has prescribed in the Uniform Directory Template.

The Uniform Directory Template was designed to maximize compatibility with other data input needs to facilitate a single, consistent input process for providers. NATA does not require an issuer to use the Uniform Directory Template for other purposes. However, if an issuer implements the Uniform Directory Template through a web portal, Section 55 also does not prohibit the portal from requesting additional information outside the scope of the Uniform Directory Template as long as (1) the Uniform Directory Template is treated as a separate document within the portal and (2) the additional information

¹ Available at <https://www.ilga.gov/legislation/PublicActs/View/103-0650>.

is not used for a provider directory subject to NATA or required to be submitted before the issuer accepts the provider's submission of the Uniform Directory Template.²

NATA requires issuers to verify their provider directories for accuracy at least every 90 days. 215 ILCS 124/25(a)(3). The federal No Surprises Act requires that providers respond to the issuers' verification requests, 42 U.S.C. 300gg-139,³ which NATA incorporates into State law. 215 ILCS 124/35. Therefore, providers must verify the accuracy of their information at least every 90 days.

In addition to the 90-day verification cycle, Section 25(a)(2) of NATA states: "Providers shall notify the network plan electronically or in writing within 10 business days of any changes to their information as listed in the provider directory, including the information required in subsections (b), (c), and (d). With regard to subparagraph (I) of paragraph (1) of subsection (b), the provider must give notice to the issuer within 20 business days of deciding to cease accepting new patients covered by the plan if the new patient limitation is expected to last 40 business days or longer."

NATA does not require a provider to newly fill in every field from the Uniform Directory Template every time they respond to an issuer's verification request or whenever the provider updates their directory information on their own initiative. For example, in the verification process, NATA would allow an issuer to send the provider a copy of their current provider directory information, and the issuer could require the provider to attest either that all provider directory information remains accurate as of the current date or that all information remains accurate except for the revised information that the provider concurrently furnishes on the Uniform Directory Template. Or, rather than sending a copy of the current provider directory information, if the issuer uses a web portal with the appropriate capabilities, the issuer could require the provider to login to view the current provider directory information and make the attestation described above along with any revisions needed using the Uniform Directory Template.

The Uniform Directory Template includes: (1) Instructions describing the applicability of each tab; (2) a tab to be filled by individual health care professionals who are part of a medical group, facility, or hospital; (3) a tab to be filled by facilities and hospitals; (4) a tab to be filled by medical groups; (5) a tab to be filled by solo practitioners; and tabs providing lists of practice limitations and specialty taxonomies to be used in the other tabs. In tabs 2-5, Column A groups the data fields under various categories; Column B lists the data fields; Column C lists whether they are "required" or "if applicable"; and Column D provides additional comments on specific data fields. Please note that the Column heading "All Other Products offered by the Plan (Medicare Advantage, Medicare Complete, Commercial)" is copied from the Universal IAMHP Roster Template for the sake of familiarity and interoperability and is not intended to subject Medicare products to NATA provider directory requirements.

If you have any questions about this Company Bulletin or the Template, please contact the Department by either emailing DOI.InfoDesk@illinois.gov or calling 217-782-4515.

² If the additional questions are for a provider directory not subject to the NATA, or if they are for a purpose unrelated to provider directories, such as credentialing, issuers should consult any laws and regulations governing those non-NATA directories or those non-directory purposes to ensure compliance.

³ Available at [https://uscode.house.gov/view.xhtml?req=\(title:42%20section:300gg-139%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:42%20section:300gg-139%20edition:prelim)).