STATE OF MISSOURI

DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

***In Re*:**	)	
	)	
CIGNA HEALTH AND LIFE INSURANCE COMPANY (NAIC #67369)	)	**Market Conduct Investigation No. 404869**
	)	
	)	

ORDER OF THE DIRECTOR

NOW, on this 19th day of September, 2025, Director Angela L. Nelson, after consideration and review of the Stipulation of Settlement (hereinafter "Stipulation") entered into by the Division of Insurance Market Regulation (hereinafter "Division") and Cigna Health and Life Insurance Company (NAIC #67369) (hereinafter "Cigna"), relating to the market conduct investigation no. 404869, does hereby issue the following orders:

This order, issued pursuant to §374.046.15[1] and §374.280 RSMo, is in the public interest.

IT IS THEREFORE ORDERED that the Director does hereby approve the Stipulation as agreed to by Cigna and the Division.

IT IS FURTHER ORDERED that Cigna shall not engage in any of the violations of statutes and regulations set forth in the Stipulation, shall implement procedures to place it in full compliance with the requirements in the Stipulation and the statutes and regulations of the State of Missouri, shall maintain those corrective actions at all times, and shall fully comply with all terms of the Stipulation.

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[1] All references, unless otherwise noted, are to Revised Statutes of Missouri 2016.

IT IS SO ORDERED.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of my office in Jefferson City, Missouri, this 19th day of September, 2025.

Angela L. Nelson
Director

IN THE DEPARTMENT OF COMMERCE AND INSURANCE
STATE OF MISSOURI

***In Re*:**	)	
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CIGNA HEALTH AND LIFE INSURANCE COMPANY (NAIC #67369)	)	**Market Conduct Investigation No. 404869**
	)	
	)	
	)	

STIPULATION OF SETTLEMENT

It is hereby stipulated and agreed by the Division of Insurance Market Regulation (hereinafter the “Division”), and Cigna Health and Life Insurance Company (hereinafter “Cigna”), as follows:

WHEREAS, the Division is a unit of the Missouri Department of Commerce and Insurance (hereinafter the “Department”), an agency of the State of Missouri, created and established for administering and enforcing all laws in relation to insurance companies doing business in the State of Missouri;

WHEREAS, Cigna has been granted a certificate of authority to transact the business of insurance in the State of Missouri;

WHEREAS, the Division conducted a market conduct investigation of Cigna, investigation no. 404869; and

WHEREAS, based on the market conduct investigation of Cigna, the Division alleges that:

1. Cigna’s Explanation of Benefits (hereinafter “EOBs”) inaccurately represented the amounts billed by the health care provider and the member’s responsibility portion of the claim, in violation of §375.1007 (1)[1] and §375.1005.

2. Cigna inaccurately defined in-network providers on its EOBs as having a contractual relationship with Cigna when not all in-network providers had such a relationship, in violation of §375.936

1 All statutory references, unless otherwise noted, are to the 2016 Revised Statutes of Missouri.

(6) (a) and §375.934.

3. Cigna applied copayments for chiropractic services that exceeded 50 percent of the total cost of providing a single chiropractic service, in violation of §376.391.

WHEREAS, the Division and Cigna have agreed to resolve the issues raised in the market conduct investigation as follows:

A. **Scope of Agreement.** This Stipulation of Settlement (hereinafter "Stipulation") embodies the entire agreement and understanding of the signatories with respect to the subject matter contained herein. The signatories hereby declare and represent that no promise, inducement, or agreement not herein expressed has been made and acknowledge that the terms and conditions of this agreement are contractual and not a mere recital.

B. **Remedial Action.** Cigna agrees to take remedial action, bringing it into compliance with the statutes and regulations of Missouri, and agrees to maintain those remedial actions at all times. Such remedial actions shall include the following:

1. Cigna agrees to provide an explanation of benefits (EOBs) to members that accurately reflect (a) the billed and allowed amounts of the health care provider as that term is defined in §376.1350 (20), (b) the member's liability amounts, including, but not limited to, deductibles, coinsurance and copayments based on the amount billed by the health care provider as that term is defined in §376.1350 (20), and (c) the part of the amount billed that the member is responsible for based on the amount billed by the health care provider as that term is defined in §376.1350 (20).

2. Cigna agrees to provide the Division with a random sample of 20 EOBs and remittance advices for ASH claims issued between March 1, 2026 and August 31, 2026. The Division will review this sample for compliance with Remedial Action 1. The sample shall be provided within 45 days from the end of the review period.

3. Cigna agrees to amend the definition of "in-network" on its EOB's by February 27, 2026, to accurately reflect that in- network can include providers who, in some instances, are not contracted with Cigna.

4. Cigna agrees not to apply copayments for chiropractic services that exceed 50 percent of the total cost of providing a single chiropractic service.

5. Cigna agrees to review all chiropractic claims from January 1, 2021, to the date of the Order approving this Stipulation to determine if copayments charged exceeded 50 percent of the total cost of providing a single chiropractic service. If copayments exceed the amount permitted under §376.391, Cigna agrees to issue refunds to affected members for the amount of the overcharges. Interest shall be included with the refunded payments pursuant to §374.191. A notice will also be included with the payment indicating that as a result of a Missouri Market Conduct Investigation, it was determined that a refund is owed to the claimant. Cigna agrees to complete the requirements in this section by January 24, 2026.

6. If Cigna has determined pursuant to Section B 5 that copayments charged exceeded 50 percent of the total cost of providing a single chiropractic service and has already issued a refund payment to the provider, it shall proceed in the following manner:

a. If Cigna obtains a written attestation from the provider attesting that the provider has issued a refund to the member for the overcharge including interest pursuant to §374.191, then Cigna need take no further action.

b. If Cigna obtains a written attestation from the provider attesting that the provider has issued a refund to the member for the overcharge, but failed to include interest with the payment, then Cigna shall issue payment to the member for the amount of the interest owed pursuant to §374.191.

c. If Cigna is unable to obtain a written attestation from the provider attesting that the provider has issued a refund to the member for the overcharge including interest pursuant to

§374.191, then Cigna shall issue a refund to the member along with applicable interest by January 24, 2026.

7. For a period of one year after the date of the Order approving this Stipulation, Cigna agrees to conduct semi-annual audits of at least 50 random claims taken from all chiropractic claims closed during each audit period to review for compliance with §376.391 and the requirements in remedial action 4. The first audit will be conducted starting on April 1, 2026 and will be completed by June 1, 2026. The first audit will review claims closed from the date of the Order approving this Stipulation through March 15, 2026. The second audit will be conducted starting on October 1, 2026 and will be completed by December 1, 2026. The second audit will review claims closed from March 16, 2026 through September 15, 2026. Cigna further agrees to reprocess any claims that do not comply with Missouri law or meet the requirements of the remedial actions, together with payment of interest pursuant to § 374.191 . Any payments made pursuant to this paragraph shall be made to the member. Cigna agrees to report to the Division the results of each audit including reprocessed claims along with supporting evidence as requested by the examiners within 45 days of the completion of each audit.

C. **Compliance.** Cigna agrees to file documentation pursuant to § 374.190 with the Division, in a format acceptable to the Division of any remedial action taken to implement compliance with the terms of this Stipulation, including the payment of refunds to claimants. Cigna agrees to provide such documentation within 90 days of the entry of the Order approving this Stipulation unless otherwise specified in Section B above.

D. **Non-Admission.** Nothing in this Stipulation shall be construed as an admission by Cigna, this Stipulation being part of a compromise settlement to resolve disputed factual and legal allegations arising out of the above-referenced market conduct investigation.

E. **Waivers.** Cigna, after being advised by legal counsel, does hereby voluntarily and knowingly waive any and all rights to procedural requirements, including notice and an opportunity for a hearing and review or appeal by any trial or appellate court, which may have otherwise applied to the market conduct investigation no. 404869.

F. **Amendments.** No amendments to this Stipulation shall be effective unless made in writing and agreed to by authorized representatives of the Division and Cigna.

G. **Governing Law.** This Stipulation shall be governed and construed in accordance with the laws of the State of Missouri.

H. **Authority.** The signatories below represent, acknowledge, and warrant that they are authorized to sign this Stipulation on behalf of the Division and Cigna, respectively.

I. **Counterparts and Electronic Signature.** This Stipulation may be executed in multiple counterparts, each of which shall be deemed an original and all of which, taken together, shall constitute a single document. Execution by facsimile or by electronically transmitted signature shall be fully and legally effective and binding.

J. **Effect of Stipulation.** This Stipulation shall not become effective until the entry of an Order by the Director approving this Stipulation.

K. **Request for an Order.** The signatories below request that the Director issue an Order approving this Stipulation and ordering the relief agreed to in the Stipulation, and consent to the issuance of such Order.

DATED: September 15, 2025

T Kroll

Teresa Kroll
Chief Market Conduct Examiner
Division of Insurance Market Regulation

DATED: 9/8/2025

Gloria Russo Perrotta

Name: Gloria Russo Perrotta
Title: Vice President
Cigna Health and Life Insurance Company