

Employer-Based Health Insurance Scheme (EHIP) Registration in Nigeria

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Description

If you run a company in Nigeria and you employ people, health insurance is no longer something you should treat as a “nice thing to have”.

It is becoming a **compliance issue**.

And this is where many employers are getting it wrong.

They hear “health insurance registration” and immediately think of simply getting an HMO.

That is not always the correct approach.

Depending on the nature and size of your business, your employees, and the applicable health insurance framework, you may need to deal with the **National Health Insurance Authority (NHIA)**, a State Social Health Insurance Scheme, or an approved private health plan.

In this article, I will explain what employers need to know about **Employer-Based Health Insurance Scheme (EHIP) registration**, the documents involved, how the process works, the likely costs, and the practical compliance issues employers should watch out for.

More importantly, I will explain this from the perspective of someone who has spent years helping businesses deal with Nigerian regulators.

Because registration is one thing.

Getting the compliance right is another thing entirely.

What is Employer-Based Health Insurance Scheme (EHIP)?

Employer-Based Health Insurance Scheme is generally used to describe an arrangement where an employer facilitates health insurance coverage for its employees and, where applicable, their dependants.

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Under Nigeria's current framework, however, employers should be careful about using "EHIP" as though it is a single standalone federal registration category.

The National Health Insurance Authority Act 2022 places obligations around employer and employee registration under applicable health insurance schemes. The Act also provides for contributions under formal-sector arrangements.

For private companies, one important NHIA option is the **Organised Private Sector Social Health Insurance Programme (OPSSHIP)**.

The NHIA states that OPSSHIP is available to private companies with **five or more employees** and provides coverage for employees, their spouses and up to four children below 18 years, subject to the applicable programme rules.

There are also private health plans administered through approved Health Maintenance Organisations (HMOs).

So, when a client tells me:

> "We want to register for EHIP."

My first question is usually:

Which health insurance arrangement is actually applicable to your company?

That question can save you a lot of unnecessary expense.

Why Employers Should Take This Seriously

Let me put this bluntly.

Many Nigerian businesses are very good at registering the company with CAC.

They obtain TIN.

They open the corporate account.

They register for PAYE.

They obtain tax clearance.

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Then they forget about employee-related regulatory obligations.

Until a regulator asks questions.

That is when everybody starts running around.

The NHIA Act provides for mandatory health insurance participation, and the NHIA has also intensified implementation of health insurance requirements. In September 2025, the NHIA announced a presidential directive concerning mandatory health insurance implementation across Federal Government MDAs, including requirements around valid NHIA certificates for certain procurement, licenses and permits.

The direction of regulation is clear.

Businesses should not wait until a tender, license renewal, regulatory inspection or government transaction forces them to start looking for their health insurance compliance documents.

Who Needs Employer-Based Health Insurance Registration?

The answer depends on the applicable scheme.

For example, NHIA currently states that OPSSHIP is available to **private companies with five or more employees**.

A company with fewer employees may fall into a different category.

The NHIA also identifies GIFSHIP as a programme that can accommodate small businesses with fewer than 10 employees, as well as associations, unions, charities and other groups.

This is why I always advise business owners not to copy what another company is doing.

Your neighbour's registration may not be your registration.

Your employee structure may be different.

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Your State may have its own social health insurance framework.

Your business may also already have a private HMO arrangement.

Compliance must be based on your actual circumstances.

What Does EHIP Registration Cover?

Depending on the arrangement, registration may involve:

Area	What it means
Employer registration	Registration of the company under the applicable health insurance programme
Employee enrolment	Registration of eligible employees
Dependants	Registration of eligible spouses and children where applicable
Contributions	Payment of applicable employer/employee contributions
Healthcare provider	Access to approved healthcare facilities
HMO/private plan	Where the employer uses an approved private health insurance structure

Area	What it means
Compliance evidence	Certificate, enrolment records and payment evidence
Updates	Addition/removal of employees and dependants as circumstances change

The important point is that **registration is not the end of the process**.

Employee changes must also be properly managed.

What Are the Requirements for EHIP Registration?

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For an organised private-sector registration, the NHIA currently lists the following requirements:

1. Letter of Interest

The company is required to submit a letter expressing its interest in enrolling under OPSSHIP.

2. Company Nominal Roll

You will need an updated nominal roll showing your employees.

This should not be an old document prepared simply because somebody requested it.

It should reflect the company’s actual workforce.

3. Salary Records

The NHIA currently requires **three months’ verifiable salary schedules stamped by the bank** for OPSSHIP registration.

This is one of those areas where employers can easily run into problems.

If your payroll records are inconsistent with your nominal roll, somebody will notice.

4. Minimum Basic Salary Requirement

The NHIA's current OPSSHIP guidance states a minimum basic salary requirement of **₦30,000** for participation.

5. Initial Contribution

The employer is required to make payment to the NHIA Fund Account through Remita.

The current requirement includes a minimum initial contribution covering **12 months**, as computed by NHIA.

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6. Employee Enrolment

After the application and relevant requirements are processed, NHIA coordinates the enrolment of employees.

The Authority states that it may conduct an enrolment visit to the organisation.

Basic Documents We Usually Request From a Client

Before commencing an employer health insurance registration, I normally advise the company to prepare its corporate and employee records.

A practical checklist may include:

Document/Information	Purpose
Certificate of Incorporation	Establishes the legal identity of the company
CAC company details	Confirms current corporate information
Company address	Registration and correspondence
Letter of interest/application	Formal commencement of registration
Current nominal roll	Identifies employees

Document/Information	Purpose
Employee details	Required for enrolment
Salary schedules	Verification of payroll
Bank-stamped salary records	Supports salary verification
Employee NIN details	Identification/enrolment
Contact details	Communication and enrolment
Existing HMO information	Determines whether another arrangement already exists
Evidence of payment	Confirms statutory contribution
Other regulatory documents	Depending on the applicable scheme

The exact requirements can vary depending on the programme and the regulator involved.

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That is why I do not recommend preparing a generic “health insurance file” and assuming it will work everywhere.

How Much Does EHIP Registration Cost?

This is where many clients ask the wrong question.

They ask:

> “How much is the registration?”

There may not be one single answer.

The cost can include:

1. Statutory health insurance contributions.
2. Employee enrolment costs where applicable.
3. NHIA identification costs.
4. HMO/private health plan premiums, where applicable.
5. Additional dependant costs.
6. Professional processing fees.
7. Administrative/documentation costs.

8. Bank or payment charges where applicable.

For OPSSHIP, NHIA states that the initial payment includes a minimum of **12 months' contribution**, calculated based on the applicable payroll information.

So, I would be very careful with anybody who tells you:

> "EHIP registration is ₦XXX flat."

That may be their professional fee.

It may not be the total regulatory cost.

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What About Employer and Employee Contributions?

This is another area where employers should be careful.

The NHIA's published information contains contribution structures for formal-sector health insurance. Its FAQ currently references employer and employee contributions based on salary structures.

However, the applicable contribution structure depends on the particular programme and framework.

For example, the NHIA's public-sector programme page provides different contribution approaches for public-sector employees.

Therefore, an employer should not simply take a percentage from an internet article and start deducting it from salaries.

Confirm the applicable scheme first.

This is compliance.

Not guesswork.

Is EHIP the Same as HMO Registration?

No.

This is a very important distinction.

An HMO is a Health Maintenance Organisation.

A company can have a private health plan administered through an approved HMO.

The NHIA also operates organised-sector social health insurance programmes.

The NHIA expressly distinguishes OPSSHIP from private health plans. OPSSHIP is administered by NHIA, while private health plans are provided by HMOs.

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So if a company says:

> "We already have an HMO. We don't need health insurance compliance."

I would not automatically accept that conclusion.

We need to examine:

- who the HMO is;
- whether it is approved;
- what plan the company has;
- who is covered;
- whether the arrangement satisfies the applicable legal requirements;
- whether there is evidence of enrolment;
- and whether the company's records are current.

Having an HMO card is not the same thing as having a properly documented compliance structure.

The Practical Problem Nigerian Employers Face

Let me give you the real-world side.

The problem is rarely just filling a form.

The real problem is usually **inconsistency**.

For example:

The CAC record says one address.

The payroll says another.

The nominal roll contains 47 employees.

The salary schedule contains 38.

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The HR department says five employees resigned last month.

The bank statement shows another figure.

Three employees have no NIN information.

Two employees have changed their names.

One employee has been transferred to another branch.

And then somebody says:

> “Sir, just help us process it.”

This is where experience matters.

Before submission, the records need to be reconciled.

Otherwise, you can submit an application that looks fine on paper but creates questions later.

Our Practical Approach to EHIP Registration

At **ICA-Ibe, Chido & Associates**, we approach regulatory registration differently.

We do not simply collect documents and upload them.

We first understand the business.

Step 1: Compliance Assessment

We examine the company's:

- employee strength;
- business structure;
- location;
- payroll structure;
- existing health insurance arrangement;
- employee/dependant structure;
- and applicable regulatory requirements.

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Step 2: Determine the Correct Scheme

This is important.

We determine whether the company should proceed under:

- OPSSHIP;
- formal-sector arrangement;
- applicable State Social Health Insurance Scheme;
- private health plan;
- or another applicable structure.

Step 3: Document Review

We review the company's corporate and employee documents.

We identify discrepancies before submission.

Step 4: Prepare the Application

We prepare the required application and supporting documents.

Step 5: Regulatory Submission

We coordinate the submission to the appropriate authority.

Step 6: Follow-Up

We follow up on the application.

This is where many people underestimate the work.

Submission is not approval.

Step 7: Employee Enrolment

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We assist with employee enrolment and collation of the required information.

Step 8: Obtain Compliance Evidence

We ensure that the company receives and keeps the appropriate evidence of registration/enrolment.

Step 9: Post-Registration Compliance

We advise the employer on maintaining the registration.

Because employees come and go.

Payroll changes.

Dependants change.

Company information changes.

Compliance must therefore be maintained.

How Long Does EHIP Registration Take?

There is no responsible way to promise every employer the same processing time.

The timeline depends on:

- completeness of documentation;
- number of employees;
- regulatory verification;
- payroll verification;
- enrolment arrangements;
- payment confirmation;
- and the workload of the relevant authority.

For some processes, the physical enrolment exercise itself can affect the timeline.

The NHIA's published information for some formal-sector enrolment processes indicates that processing can take up to three months before access to care.

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So, if a company needs health insurance compliance for a tender, license, permit or regulatory submission, **do not wait until the deadline is tomorrow.**

That is how unnecessary pressure starts.

Common Mistakes Employers Make

1. Waiting until a tender requires it

This is probably the most common.

The company receives an RFP.

The tender requires evidence of health insurance compliance.

Suddenly, everyone wants it in 48 hours.

Regulators do not work according to your tender deadline.

2. Assuming an HMO automatically solves everything

It may not.

The arrangement has to be examined against the applicable requirements.

3. Submitting an outdated nominal roll

Employee information must be current.

4. Ignoring payroll inconsistencies

If your salary records do not match your employee records, expect questions.

5. Treating employee enrolment as an afterthought

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The employer’s registration is only part of the process.

Employees need to be properly enrolled where required.

6. Using an unverified intermediary

This happens a lot.

Someone says:

> “I can get it for you.”

Before paying, ask:

What exactly are you getting?

Is it registration?

Is it a certificate?

Is it an HMO plan?

Is it NHIA enrolment?

Is it a State health insurance registration?

Or just a piece of paper?

What Employers Should Have in Their Compliance File

I recommend that companies maintain a dedicated health insurance compliance folder.

It should contain:

Compliance Record	Status
Registration/application documents	Keep current
NHIA certificate/evidence	Keep current
Nominal roll	Update regularly
Employee enrolment records	Update regularly
Contribution/payment evidence	Keep all records
HMO agreement, where applicable	Keep current
Employee/dependant records	Update regularly
Regulatory correspondence	Keep safely
Renewal records	Track dates
Employee exit/addition records	Update promptly

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This may look simple.

But when a regulator asks for evidence, this file can save you days of unnecessary stress.

Why You Should Use a Regulatory Compliance Consultant

This is not because the application is impossible.

It is because **regulatory compliance has hidden practical issues**.

A company may be able to download a form.

That does not mean the company knows:

- which programme applies;
- which documents should be submitted;
- how to reconcile its payroll;
- how to handle discrepancies;
- how to communicate with the regulator;
- what evidence to retain;
- or what to do when the application gets queried.

After years in regulatory compliance, I have learnt one thing:

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The easiest regulatory application is the one you prepare properly before submission.

Once a bad application enters the system, correcting it can become more difficult than doing it properly from the beginning.

EHIP Registration: What You Should Budget For

For budgeting purposes, separate the cost into two categories.

Government/Regulatory Costs

These may include:

- statutory contributions;
- enrolment fees;
- NHIA identification costs;
- applicable State scheme charges;
- payment/bank charges.

Professional Fees

This covers professional work such as:

- compliance assessment;
- document review;
- preparation of application;
- employee data review;
- regulatory submission;
- follow-up;
- query resolution;
- enrolment coordination;
- obtaining compliance evidence.

This separation is important.

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It allows the client to know exactly what he is paying for.

Frequently Asked Questions

1. Is EHIP mandatory for every company in Nigeria?

Not every company necessarily falls under the same programme.

The applicable obligation depends on the company’s circumstances and the relevant health insurance framework.

The NHIA Act provides for employer and employee registration under applicable schemes, while specific programmes have their own requirements.

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2. Can a company with five employees register?

Yes.

NHIA currently states that OPSSHIP is available to private companies with five or more employees.

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3. What if my company has fewer than five employees?

Do not assume you are exempt from every health insurance arrangement.

There may be another applicable programme.

NHIA currently identifies GIFSHIP as one option available to small businesses with fewer than 10 employees.

4. Do employees' spouses and children benefit?

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Under OPSSHIP, NHIA states that coverage includes the employee, spouse and up to four children below 18 years, subject to the programme rules.

Additional dependants may attract additional costs.

5. Can we use an HMO instead?

There are private health plans provided through HMOs.

Whether that arrangement is sufficient for your particular compliance requirement should be assessed before relying on it.

6. Do we need the company's nominal roll?

Yes, for OPSSHIP registration the NHIA specifically requires a current nominal roll.

7. Are salary records required?

Yes.

The current OPSSHIP requirements include three months' verifiable salary schedules stamped by the bank.

8. Can you process the registration for us?

Yes.

We can assist with the compliance assessment, documentation, application, regulatory submission, follow-up, employee enrolment coordination and obtaining the relevant compliance evidence.

9. How much do you charge?

Our professional fee depends on the size of the organisation, number of employees, applicable scheme, location and the level of regulatory work required.

We normally review the company's requirements first before issuing a professional quotation.

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Final Advice to Employers

If you are an employer, do not wait until somebody asks you:

"Where is your health insurance certificate?"

That is the wrong time to start investigating your obligations.

Do it now.

Review your employee records.

Review your payroll.

Review your existing HMO arrangement.

Confirm the applicable health insurance scheme.

Regularise your enrolment.

Keep evidence.

And monitor the compliance thereafter.

Nigeria’s regulatory environment is changing.

The days when a company could operate for years with incomplete compliance records and simply “sort it out when they ask” are gradually disappearing.

As regulators become more connected, compliance documents increasingly become part of procurement, licensing, contracting, immigration, employment and corporate verification processes.

Do not wait for the problem before solving the problem.

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If your company needs assistance with **Employer-Based Health Insurance Scheme (EHIP), NHIA/OPSSHIP registration, employee enrolment, health insurance compliance review or regulatory documentation**, we can assess the company and advise you on the correct route before commencing the application.

That is usually the safer and cheaper way to do it.

Category

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