



## MEMORANDUM

TO: Issuers of Individual and Small Group Health Insurance Coverage and Issuers of Exchange-certified Stand-Alone Dental Coverage

FROM: Kendall Buchanan  
Deputy Director of Market Regulation and Public Information

SUBJECT: Revised Filing Timeline for Plan/ Policy Years Beginning in 2021

DATE: May 15, 2020

### I. PURPOSE

The purpose of this memorandum is to set forth revised filing timelines for issuers wishing to offer non-grandfathered health insurance coverage or coverage of pediatric dental services under Exchange-certified Stand-Alone Dental Plans pursuant to the Patient Protection and Affordable Care Act's (ACA) 2014 Market Reforms with plan or policy years beginning in calendar year 2021. It is specific to any such coverage offered in the individual or small group market as defined under South Carolina law and as amended via Bulletin 2011-11<sup>1</sup>. Hereafter, these policies are referred to as 2021 Plans and 2021 SADPs, respectively.

### II. FILING TIMELINES FOR 2021 PLANS AND 2021 SADPs

The Department previously published filing timelines on [March 26, 2020](#) based upon proposed federal timelines. Recently, the final federal timelines have been published by the Center for Consumer Information and Insurance Oversight (CCIIO) and are summarized in the [Final Key Dates for Calendar Year 2020](#) (May 7, 2020) and the [Final 2021 Letter to Issuers in the Federally-facilitated Exchanges](#) (May 7, 2020).

Importantly, the final deadline for submission of QHP application data has been extended by one week, to August 26, 2020. This is the same deadline by which issuers must finalize all rate filings that contain QHPs in the federal Unified Rate Review (URR) System. For those issuers that are seeking to write 2021 Plans strictly outside of the FFM or FF-SHOP, the URR deadline is October 15, 2020. Due to the additional time provided for QHP applications and related URR rate submissions, we are now extending our initial filing dates for QHP and SADP issuers as reflected in the revised dates below:

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<sup>1</sup> This guidance does not apply to non-grandfathered health insurance coverage that does not comply with the 2014 Market Reforms, commonly referred to as "grandmothered" plans, that may be renewed under the transitional policy as most recently extended via SCDOI Bulletin 2020-01.



Health Insurance Issuers Seeking QHP Certification (excluding SADPs)

QHP Application Deadline:	June 17, 2020
<b>Submit Rate/ Form Filing in SERFF by:</b>	<b>June 29, 2020</b>
<b>Submit Binder in SERFF Plan Management by:</b>	<b>June 29, 2020</b>
Submit Rate Filing Justification in URR Module by:	June 29, 2020 <sup>2</sup>
SERFF/ URR System Dispositions Deadline:	August 26, 2020 at 3:00 p.m. EDT
State QHP Certification Recommendations Due:	September 23, 2020

Dental Issuers Seeking SADP Certification (including SADPs that will be offered strictly outside of the FFM and/or FF-SHOP)

QHP Application Deadline:	June 17, 2020
<b>Submit Rate/ Form Filing in SERFF by:</b>	<b>July 6, 2020</b>
<b>Submit Binder in SERFF Plan Management by:</b>	<b>July 6, 2020</b>
SERFF Dispositions Deadline:	August 26, 2020
State QHP Certification Recommendations Due:	September 23, 2020

Health Insurance Issuers Writing Solely Outside of the FFM

<b>Submit Rate/ Form Filing in SERFF by:</b>	<b>July 15, 2020</b>
<b>Submit Binder in SERFF Plan Management by:</b>	<b>July 15, 2020</b>
Submit Rate Filing Justification in URR Module by:	July 15, 2020 <sup>3</sup>
SERFF/ URR System Dispositions Deadline:	October 15, 2020 at 3:00 p.m. EDT

*Open Enrollment for 2021 Plans:* November 1, 2020 - December 15, 2020

### III. FILING REQUIREMENTS FOR 2021 PLANS & 2021 SADPs

Please review the prior memorandum and the Department's LA&H webpage under the [PPACA Resources heading](#) for additional guidance on filing requirements.

Included on that website are links to the 2020 Filing Requirements (for 2021 Plans) charts, which may also be accessed by clicking [here for Major Medical](#) and [here for SADPs](#).

### IV. QUESTIONS

Issuers should regularly check the LA&H webpage ([doi.sc.gov/lah](http://doi.sc.gov/lah)) over the coming weeks for additional materials relative to the filing and review process. Please note that all materials will be listed under the PPACA Resources heading.

Questions regarding this notice, the filing process, or any related filing materials should be submitted via email to [lahmail@doi.sc.gov](mailto:lahmail@doi.sc.gov) and include the company name and primary point of contact (with phone number and email address) for follow up.

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<sup>2</sup> The federal deadline is July 22, 2020, but 45 CFR 154.220(b) requires issuers to submit rate information by the earlier of: (a) the State's deadline or (b) the date specified by the Secretary of HHS.

<sup>3</sup> *Id.*