



MEMORANDUM

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

FROM: Michael Wise
Manager, Office of Market Services

SUBJECT: Rates & Forms Filing Timeline for Plan & Policy Years Beginning in 2022

DATE: March 10, 2021

I. PURPOSE

This memorandum details the filing timelines for issuers offering:

- individual or small group¹ non-grandfathered health insurance coverage²; or
- coverage of pediatric dental services under Exchange-certified Stand-Alone Dental Plans (SADPs).

It applies to coverage with plan or policy years beginning in calendar year 2022. Hereafter, these policies are referred to as 2022 Plans and 2022 SADPs, respectively.

II. FILING TIMELINES FOR 2022 PLANS AND 2022 SADPs

South Carolina has a Federally-facilitated Marketplace (FFM). However, this Department retains responsibility for the review and approval of forms and rates for 2022 Plans and 2022 SADPs sold on and off the FFM.

The Center for Consumer Information and Insurance Oversight (CCIIO) sets QHP application and single risk pool rate submission timelines annually, which are summarized in the [Key Dates for Calendar Year 2021](#) (posted by CMS on February 1, 2021).

These federally-imposed deadlines are the basis for the filing timeline summarized on the following page. We are requesting that issuers submit filings for 2022 Plans and 2022 SADPs by the following dates:

¹As defined under South Carolina law and as amended via SCDOI Bulletin 2011-11.

²This 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 2021-01.



Health Insurance Issuers Seeking QHP Certification (excluding SADPs)

QHP Application Deadline:	June 16, 2021
Submit Rate/ Form Filing in SERFF by:	June 21, 2021
Submit Binder in SERFF Plan Management by:	June 21, 2021
Submit Rate Filing Justification in URR Module by:	June 21, 2021 ³
SERFF/ URR System Dispositions Deadline:	August 18, 2021 at 3:00 p.m. EDT
State QHP Certification Recommendations Due:	September 22, 2021

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

QHP Application Deadline:	June 16, 2021
Submit Rate/ Form Filing in SERFF by:	June 28, 2021
Submit Binder in SERFF Plan Management by:	June 28, 2021
SERFF Dispositions Deadline:	August 18, 2021
State QHP Certification Recommendations Due:	September 22, 2021

Health Insurance Issuers Writing Solely Outside of the FFM

Submit Rate/ Form Filing in SERFF by:	July 15, 2021
Submit Binder in SERFF Plan Management by:	July 15, 2021
Submit Rate Filing Justification in URR Module by:	July 15, 2021 ⁴
SERFF/ URR System Dispositions Deadline:	October 15, 2021 at 3:00 p.m. EDT

Open Enrollment for 2022 Plans: November 1, 2021 – December 15, 2021

III. FILING REQUIREMENTS FOR 2022 PLANS & 2022 SADPs

Our goal continues to be to provide issuers with the maximum amount of time possible to develop their filings to get better quality, more complete submissions at the beginning of the process.

With that in mind, we ask that issuers be mindful of the following relative to the upcoming filing period:

- Filings cannot be reviewed until the associated binder is also submitted.
- The Department will only accept **one filing per 2022 Plan/SADP issuer per market segment**.
- The Department will provide two weeks for issuers to respond to initial objections. Approximately 30 days prior to the federally-imposed disposition deadlines, response timeframes will be limited to one week. Extensions will not be granted unless there is an extraordinary circumstance.
- Prior to filing, issuers should review **all objections and requests from prior years**. The current filing should be amended accordingly to expedite the review of the filing.
- Please review the 2021 Filing Requirements (for 2022 Plans) chart that will be published within the coming weeks on our website.
- The Department will publish additional guidance, including the chart of filing/ binder submission requirements, on its LA&H webpage under the PPACA Resources heading, which may be accessed at doi.sc.gov/lah.
- The information in this Memorandum is based on the Final Key Dates for Calendar Year 2021 and 2022 Draft Letter to Issuers. If the Final Letter to Issuers contains different information,

³ The federal deadline is July 21, 2021, 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.

⁴ *Id.*

the Department will issue additional guidance. Please check our [website](#) often for the latest updates.

IV. QUESTIONS

Issuers should regularly check the LA&H webpage (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:

- Submit via email to lahmail@doi.sc.gov
- Include the company name and primary point of contact (with phone number and email address)