



MEMORANDUM

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

FROM: Shari S. Miles
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SUBJECT: Rates & Forms Filing Timeline for Plan & Policy Years Beginning in 2024

DATE: April 6, 2023

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 2024. Hereafter, these policies are referred to as 2024 Plans and 2024 SADPs, respectively.

II. FILING TIMELINES FOR 2024 PLANS AND 2024 SADPs

South Carolina has a Federally Facilitated Marketplace (FFM). However, this Department retains responsibility for the review and approval of forms and rates for 2024 Plans and 2024 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 2023: Qualified Health Plan \(QHP\) Data Submission and Certification; Rate Review; and Risk Adjustment](#) (posted by CMS on March 28, 2023).

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 by CMS in their Insurance Standards Bulletin Series dated March 23, 2022.



These federally imposed deadlines are the basis for the filing timeline summarized in this Memorandum. We are requesting that issuers submit filings for 2024 Plans and 2024 SADPs by the following dates:

Health Insurance Issuers Seeking QHP Certification (excluding SADPs)

QHP Application Deadline:	June 14, 2023
Submit Rate/ Form Filing in SERFF by:	June 9, 2023
Submit Binder in SERFF Plan Management by:	June 9, 2023
Submit Rate Filing Justification in URR Module ⁵ by:	June 9, 2023 ³
SERFF/ URR ⁵ System Dispositions Deadline:	August 16, 2023
State QHP Certification Recommendations Due:	September 20, 2023

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

QHP Application Deadline:	June 14, 2023
Submit Rate/ Form Filing in SERFF by:	June 9, 2023
Submit Binder in SERFF Plan Management by:	June 9, 2023
SERFF Dispositions Deadline:	August 16, 2023
State QHP Certification Recommendations Due:	September 20, 2023

Health Insurance Issuers Writing Solely Outside of the FFM

Submit Rate/ Form Filing in SERFF by:	July 7, 2023
Submit Binder in SERFF Plan Management by:	July 7, 2023
Submit Rate Filing Justification in URR Module by:	July 7, 2023 ⁴
SERFF/ URR ⁵ System Dispositions Deadline:	October 16, 2023

Open Enrollment for 2024 Plans begins: November 1, 2023

III. FILING REQUIREMENTS FOR 2024 PLANS & 2024 SADPs

Our continued goal is 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 items 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 2024 Plan/SADP issuer per market segment**.
- The Department will provide two weeks for issuers to respond to initial objections on rate objections and one week on form objections. Approximately 30 days prior to the federally imposed disposition deadlines, response timeframes will be limited to one week or less in some cases. 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.
- When the final guidance is released, we will post the 2023 Filing Requirements (for 2024 Plans) chart on our website. Changes, updates, and new requirements for PY 2024 will be

³ The federal deadline is July 20, 2023, 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.*

⁵ A rate filing that is filed through the NAIC's System For Electronic Rates & Forms Filing (SERFF) and automatically uploaded to the URR module of HIOS will be considered as filed with CMS.

outlined in this document. It is imperative that the most recent guidelines are followed to maintain accuracy and completeness of the filing.

- The Department will publish additional guidance as necessary 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 2023. Please check our [website](#) often for the latest updates.

IV. QUESTIONS

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

Questions should be submitted via email to lahmail@doi.sc.gov and include the company name and primary point of contact (with phone number and email address).