



## 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 2025

DATE: April 26, 2024

### I. PURPOSE

This memorandum details the filing timelines for issuers offering:

- individual or small group<sup>1</sup> non-grandfathered health insurance coverage<sup>2</sup>; 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 2025. Hereafter, these policies are referred to as PY2025 Plans and PY2025 SADPs, respectively.

### II. FILING TIMELINES FOR PY2025 PLANS AND PY2025 SADPs

South Carolina has a Federally Facilitated Marketplace (FFM). However, this Department retains responsibility for the review and approval of forms and rates for PY2025 Plans and PY2025 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 2024: Qualified Health Plan \(QHP\) Data Submission and Certification; Rate Review; and Risk Adjustment](#) (posted by CMS on April 15, 2024).

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

<sup>2</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 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 PY2025 Plans and PY2025 SADPs by the following dates:

Health Insurance Issuers Seeking QHP Certification (excluding SADPs)

QHP Application Deadline:	June 12, 2024
<b>Submit Rate/ Form Filing in SERFF by:</b>	<b>June 7, 2024</b>
<b>Submit Binder in SERFF Plan Management by:</b>	<b>June 7, 2024</b>
Submit Rate Filing Justification in URR Module <sup>5</sup> by:	June 7, 2024 <sup>3</sup>
SERFF/ URR <sup>5</sup> System Dispositions Deadline:	August 14, 2024
State QHP Certification Recommendations Due:	September 18, 2024

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

QHP Application Deadline:	June 12, 2024
<b>Submit Rate/ Form Filing in SERFF by:</b>	<b>June 7, 2024</b>
<b>Submit Binder in SERFF Plan Management by:</b>	<b>June 7, 2024</b>
SERFF Dispositions Deadline:	August 14, 2024
State QHP Certification Recommendations Due:	September 18, 2024

Health Insurance Issuers Writing Solely Outside of the FFM

<b>Submit Rate/ Form Filing in SERFF by:</b>	<b>July 5, 2024</b>
<b>Submit Binder in SERFF Plan Management by:</b>	<b>July 5, 2024</b>
Submit Rate Filing Justification in URR Module by:	July 5, 2024 <sup>4</sup>
SERFF/ URR <sup>5</sup> System Dispositions Deadline:	October 15, 2024

*Open Enrollment for 2025 Plans begins:* November 1, 2024

### III. FILING REQUIREMENTS FOR PY2025 PLANS & PY2025 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 2025 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. (A document

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<sup>3</sup> The federal deadline is July 17, 2024, 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>4</sup> *Id.*

<sup>5</sup> 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.

*containing all the objections from the previous filing along with the responses would be helpful. In addition, if a change was made include where the change was made.)*

- We will post the 2024 Filing Requirements (for PY2025 Plans) chart on our website. Changes, updates, and new requirements for PY2025 will be 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](https://doi.sc.gov/lah).
- The information in this Memorandum is based on the [Final Key Dates for Calendar Year 2024](#). Please check our [website](#) often for the latest updates.

#### **IV. QUESTIONS**

Issuers should regularly check the LA&H webpage ([doi.sc.gov/lah](https://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](mailto:lahmail@doi.sc.gov) and include the company name and primary point of contact (with phone number and email address).