



MEMORANDUM

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

FROM: Glynda J. Daniels
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SUBJECT: Rates & Forms Filing Timeline for Plan & Policy Years Beginning in 2026

DATE: March 12, 2026

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 2026. Hereafter, these policies are referred to as PY2027 Plans and PY2027 SADPs, respectively.

II. FILING TIMELINES FOR PY2027 PLANS AND PY2027 SADPs

South Carolina has a Federally Facilitated Marketplace (FFM). However, this Department retains responsibility for the review and approval of forms and rates for PY2027 Plans and PY2027 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 2026: Qualified Health Plan \(QHP\) Data Submission and Certification; Rate Review; and Risk Adjustment](#) (posted by CMS on February 23, 2026).

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

² 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 PY2027 Plans and PY2027 SADPs by the following dates:

Health Insurance Issuers Seeking QHP Certification (excluding SADPs)

QHP Application Deadline:	June 10, 2026
Submit Rate/ Form Filing in SERFF by:	June 5, 2026
Submit Binder in SERFF Plan Management by:	June 5, 2026
Submit Rate Filing Justification in URR Module ⁵ by:	June 5, 2026 ³
SERFF/ URR ⁵ System Dispositions Deadline:	August 12, 2026
State QHP Certification Recommendations Due:	September 16, 2026

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

QHP Application Deadline:	June 10, 2026
Submit Rate/ Form Filing in SERFF by:	June 5, 2026
Submit Binder in SERFF Plan Management by:	June 5, 2026
SERFF Dispositions Deadline:	August 12, 2026
State QHP Certification Recommendations Due:	September 16, 2026

Health Insurance Issuers Writing Solely Outside of the FFM

Submit Rate/ Form Filing in SERFF by:	July 10, 2026
Submit Binder in SERFF Plan Management by:	July 10, 2026
Submit Rate Filing Justification in URR Module by:	July 10, 2026 ⁴
SERFF/ URR ⁵ System Dispositions Deadline:	October 15, 2026

Open Enrollment for 2026 Plans begins:	November 1, 2026
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III. FILING REQUIREMENTS FOR PY2027 PLANS & PY2027 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 2027 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

³ The federal deadline is July 15, 2026, 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.

document 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 2026 Filing Requirements (for PY2027 Plans) chart on our website. Changes, updates, and new requirements for PY2027 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.
- The information in this Memorandum is based on the [Final Key Dates for Calendar Year 2026](#). 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).