



DOMESTIC AND FOREIGN INSURERS BULLETIN NO. 149

**TO: INSURERS, HEALTH SERVICE CORPORATIONS, AND
MANAGED CARE ORGANIZATIONS THAT DELIVER OR
ISSUE FOR DELIVERY IN THIS STATE INDIVIDUAL AND
GROUP INSURANCE POLICIES OR PLANS SUBJECT TO
REGULATION UNDER TITLE 18 OF THE DELAWARE CODE.**

**RE: QUALIFIED HEALTH PLAN (QHP) RATE FILING FOR PLAN
YEAR 2026 (PY26) AND SUBMISSION TIMELINE**

DATED: March 18, 2025

Background:

On March 11, 2021, President Biden signed [H.R.1319](#) *American Rescue Plan Act* (ARPA) into law, which, among other provisions, increased the refundable tax credit rate (premium tax credit (PTC)) for 2021 and 2022. Specifically, Section 9661 provides premium tax credits for certain low-income taxpayers enrolled in qualified health plans.

On August 16, 2022, President Biden signed [H.R.5376](#) *Inflation Reduction Act of 2022* (IRA), expanding and extending ARPA premium subsidies in the individual market through calendar year 2025. Following this extension, the Centers for Medicare & Medicaid Services (CMS) provided plan issuers with a Limited Data Correction Window exclusively for ARPA subsidy-related adjustments. As outlined in Domestic and Foreign [Bulletin No. 132](#), only revisions related to the ARPA subsidy extension were accepted in the Unified Rate Review Template (URRT) for QHP PY23.

Instructions:

This Bulletin sets forth the Department's expectations for QHP Plan Year 2026 (PY26) applications and rate filings.

Given the IRA extended ARPA premium tax credits only through December 31, 2025, and the uncertainty regarding any further extension, the Department is requiring that insurers submit two sets of rate filings in the Unified Rate Review Template (URRT) for PY26 as follows:

1. Two Sets of Rate Filings:

- One set of rates that exclude the assumption that ARPA premium tax credits will extend beyond December 31, 2025.
- A second set of rates assuming the continuation of ARPA premium tax credits through December 31, 2026.

2. Actuarial Memorandum:

- Each rate filing must include an actuarial memorandum that clearly outlines the methodology used for modifying rates under each scenario.
- The memorandum must identify each assumption subject to change and demonstrate the impact of those changes on rates.

3. Documentation and Filing Process:

- All Unified Rate Review Templates (URRTs) and supporting documentation must be submitted through the System for Electronic Rate and Form Filing (SERFF).
- The URRT assuming the expiration of PTC enhancements must be attached to the URRT tab in SERFF.
- For the alternate rate submission assuming the extension of PTC enhancements, all supporting documentation, including the URRT and any relevant exhibits, must be uploaded under the "Supporting Documentation" tab in SERFF, with a component header labeled "Appendix - Alternative Submission."
- File names and labels must clearly identify the scenario (e.g., "URRT for Alternate Rates Assuming Extension of PTC Enhancements").

Important dates:

- ✓ **April 16, 2025** - QHP PY26 application submission and data validation window opens.
- ✓ **June 11, 2025** - Initial deadline for issuers to submit QHP Applications to CMS.
- ✓ **July 2, 2025** – Deadline for QHP PY26 proposed rates to be submitted through the System for Electronic Rates & Forms Filing (SERFF).

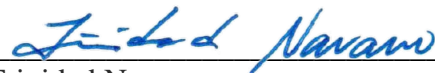
The comprehensive Delaware Submission Timeline for Plan Year 2026 is detailed at the end of this Bulletin.

Questions:

Questions concerning this Bulletin should be emailed to rate@delaware.gov.

SERFF related inquiries should be submitted to the SERFF Help Desk at serffhelp@naic.org.

This Bulletin shall be effective immediately and shall remain in effect unless withdrawn or superseded by subsequent law, regulation or bulletin.



Trinidad Navarro
Delaware Insurance Commissioner

NOTE: This Bulletin is intended solely for informational purposes. It is not intended to set forth legal rights, duties, or privileges, nor is it intended to provide legal advice. Readers should consult applicable statutes and rules and contact the Delaware Department of Insurance if additional information is needed.

◆INSURANCE.DELAWARE.GOV◆

1351 W. NORTH ST., SUITE 101, DOVER, DELAWARE 19904-2465
(302) 674-7300 DOVER◆ (302) 259-7554 GEORGETOWN◆ (302) 577-5280 WILMINGTON

Delaware Submission Timeline for Plan Year 2026

Category	Activity	Dates
QHP Certification	QHP Application Early Bird and data validation window opens	4/16/2025
QHP Certification	Deadline for issuers to submit QHP Applications/ Binders to CMS via SERFF, including Plan ID Crosswalk data	6/11/25
QHP Certification	CMS reviews QHP Applications and releases results for issuers and states to review	6/12/25-7/11/25
Rate Review	State requested deadline for issuers in states with an Effective Rate Review Program to submit PROPOSED rate filing justifications to CMS and the state	7/2/25
QHP Certification	Federal deadline for issuers to submit their QHP Application Rates Table Templates to CMS *Deadline for issuers to submit corrected QHP Application data to CMS	7/16/25
Rate Review	Deadline for CMS and states to post proposed rate increases subject to review (or link to ratereview.healthcare.gov and indsurance.delaare.gov for such information.	8/1/25
QHP Certification	Final Application Deadline: Deadline for issuers to submit changes to their QHP Applications	8/13/25
Rate Review	Deadline for finalize determinations for rate filing justifications for the ACA Marketplace	8/13/25
Form Review	Deadline for QHP forms to be finalized	8/13/25
QHP Certification	CMS reviews QHP Applications and releases results for issuers and states to review	8/14/25-9/8/25
QHP Certification	State Plan Confirmation Deadline: States complete final plan confirmation	9/9/25-9/17/25
QHP Certification	CMS releases certification notices to issuers and states	9/30/25-10/1/25
Rate Review	Deadline for Effective Rate Review states to finalize rate filing justifications that only contain non-QHPs/Off Marketplace	10/15/25
Form Review	Deadline for non-QHPs/Off Marketplace forms to be finalized	10/15/25
Rate Review	Target date on which CMS will post all final rate changes	10/31/25
QHP Certification	Anticipated public display of QHP quality rating information	11/1/25
Form Review	Deadline for non-QHPs URLs to be live and active	11/1/25
QHP Certification	Open Enrollment begins	11/1/25

◆INSURANCE.DELAWARE.GOV◆

1351 W. NORTH ST., SUITE 101, DOVER, DELAWARE 19904

(302) 674-7300 DOVER◆ (302) 259-7554 GEORGETOWN◆ (302) 577-5280 WILMINGTON