



DOMESTIC AND FOREIGN INSURERS BULLETIN NO. 166

**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: PLAN YEAR 2027 ACA INDIVIDUAL AND SMALL GROUP RATE
FILING REQUIREMENTS AND REVISED SUBMISSION
TIMELINE**

DATED: June 11, 2026

REVISED: August 7, 2026

This revised Bulletin updates the Plan Year (PY) 2027 rate filing and Qualified Health Plan (QHP) certification timelines originally issued on June 11, 2026. Following CMS's July 31, 2026 bulletin titled "[Revised Timing of QHP Data Submission and Certification for the 2027 Plan Year for Issuers in the Federally-facilitated Exchanges](#)", released in connection with the *City of Columbus v. Kennedy* decision, the Delaware Department of Insurance (Department) is updating carrier deadlines to ensure alignment with the latest federal guidance.

All carriers offering ACA-compliant Individual and Small Group health benefit plans in Delaware must comply with the revised CMS dates incorporated in the Revised Delaware Submission Timeline for Plan Year 2027, which is provided at the end of this Bulletin.

Rate Filing Requirements

Carriers shall submit a single rate filing using the Unified Rate Review Template (URRT) and provide all required supporting documentation as follows:

1. Actuarial Memorandum:

- Each rate filing must include an actuarial memorandum that clearly describes the methodology used to develop the proposed rates.
- The actuarial memorandum must identify and support all material assumptions used in developing the proposed rates.
- Any changes in methodology, assumptions, or rating factors from the prior plan year must be clearly identified and explained.

2. Documentation and Filing Process

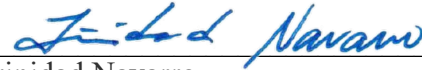
- All URRTs, actuarial memoranda, and supporting documentation must be submitted through the System for Electronic Rate and Form Filing (SERFF).
- Filings must be complete upon submission and include all information necessary for the Department's review.
- Carriers shall promptly respond to requests for additional information from the Department during the rate review process.
- Carriers must demonstrate that the proposed rates comply with all applicable state and federal requirements.

Questions

Questions concerning this Bulletin should be directed 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

Revised Delaware Submission Timeline for Plan Year 2027

The timeline below supersedes the table published in Bulletin No. 166 on June 11, 2026. All revised dates are shown in blue.

Category	Activity	Dates
QHP Certification	QHP Application Submission and data validation window opens	4/15/2026
QHP Certification	Initial Application Deadline for issuers to submit QHP Applications/ Binders to CMS via SERFF, including Plan ID Crosswalk data	6/10/2026
QHP Certification	CMS reviews initial QHP Applications and releases results for issuers and states to review	6/11/2026 – 7/10/2026
Rate Review	State (DE) requested deadline for issuers in states <u>with</u> an Effective Rate Review Program to submit <u>PROPOSED</u> rate filing justifications to CMS and the State (DE)	6/15/2026
QHP Certification	Secondary Application Deadline: Deadline for issuers to submit their QHP Application Rates Table Templates to CMS; optional deadline for issuers to submit corrected QHP Application data to CMS	7/15/2026
Rate Review	Deadline for states <u>with</u> an Effective Rate Review Program to post proposed rate increases subject to review (or link to ratereview.healthcare.gov for such information)	7/31/2026
QHP Certification	Final Application Deadline: Deadline for issuers to submit changes to their QHP Applications	8/20/2026
Rate Review	Deadline for Effective Rate Review states with Exchanges served by Healthcare.gov platform to finalize determinations for rate filing justifications <u>that include a QHP</u>	8/28/2026
Form Review	Deadline for QHP forms to be finalized	8/20/2026
QHP Certification	CMS reviews QHP Applications and releases results for insurers and states to review	8/21/2026 – 9/15/2026
QHP Certification	State Plan Confirmation Deadline: States complete final plan confirmation	9/15/2026 – 9/23/2026
QHP Certification	CMS releases certification notices to issuers and states	10/6/2026 – 10/7/2026
Rate Review	Deadline for Effective Rate Review states to finalize rate filing justifications <u>that contain only non-QHPs/OFF Marketplace</u>	10/15/2026
Form Review	Deadline for non-QHP/OFF Marketplace forms to be finalized	10/15/2026
Rate Review	Target date on which CMS will post <u>all</u> final rate changes	10/20/2026
QHP Certification	Anticipated public display of QYP quality rating information	11/1/2026
Form Review	Deadline for non-QHP URLs to be live and active	11/1/2026
QHP Certification	Open Enrollment begins	11/1/2026