



COMMONWEALTH OF MASSACHUSETTS
Office of Consumer Affairs and Business Regulation
DIVISION OF INSURANCE

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HEALTH COVERAGE
Filing Guidance Notice 2023-C

TO: Health Insurance Carriers Submitting Rate Filings Subject to M.G.L. c. 176J

FROM: Kevin Beagan, Deputy Commissioner, Health Care Access Bureau

DATE: April 28, 2023

RE: CY2024 Rate Filings with URRT Information

This Filing Guidance Notice informs insurance carriers (“Carriers”) regarding the inclusion of URRT materials with the submission of CY2024 rate filings. This Filing Guidance Notice highlights the need for 2 separate filings to allow URRT information to be uploaded to the Health Insurance Oversight System (“HIOS”).

URRT

Under rules promulgated by the federal Centers for Medicare and Medicaid Services (“CMS”), Carriers operating in the individual and group health insurance markets are required to complete a Unified Rate Review Template (“URRT”), along with a narrative, that summarizes the nature of all proposed rate changes within those markets. Despite the nature of Massachusetts’ merged individual/small group market, Carriers are expected to complete separate URRT documents for Massachusetts’ individual and small group markets.

SERFF Filings

CMS has instructed Carriers to include URRTs within the SERFF records that Carriers use to submit rate filings for review by state insurance agencies. Federal rules expect that there be two separate SERFF (System for Electronic Rate and Form Filings) submissions with one including the URRT for the individual business and the other the URRT for the small group business. Note also that the URRTs to be submitted to HIOS require the inclusion of geographic rating factors.

In order to accommodate this federal requirement, as well as our public records responsibilities, the Division instructs Carriers to do the following:

- Submit the rate filing that includes the merged market rate filing materials (e.g. Data Collection Tool). Within this filing, there should be 3 versions of the URRT, as follows:
 - The URRT for individual business that includes geographic rating factors, as required by CMS. This should be submitted to the URRT tab. Do not include the URRT with rating factors anywhere else in this SERFF submission.

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- Both the small group and individual URRTs that do not include rating factors. These should be posted to the “Unified Rate Review Template - PUBLIC VERSION” section of the Supporting Information tab.
- Create a second submission, identified as an informational filing, that only includes, within the URRT tab, the URRT (including rating factors) and associated narratives for small group business). No other material should be submitted with this filing.

If you have any questions about the content of this Filing Guidance Notice, please contact Kevin Beagan at 617-521-7323 or kevin.beagan@state.ma.us.