



COMMONWEALTH OF MASSACHUSETTS

Office of Consumer Affairs and Business Regulation

DIVISION OF INSURANCE

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HEALTH COVERAGE Filing Guidance Notice 2023-D

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: Rate Filing Summary to be submitted along with the CY2024 Rate Filing

This Filing Guidance Notice informs insurance carriers (“Carriers”) regarding the content of the rate filing summary to be submitted along with the CY2024 rate filings in accordance with recent changes promulgated to 211 CMR 66.00, pertaining to the merged market (individual and small group market). This Filing Guidance Notice sets forth the timing and submission of such rate filing summaries.

Timing of Filings

Rate Filings for CY2024

As noted in Filing Guidance Notice 2023-B, by no later than May 15, 2023, Carriers are to submit rate filings via the System for Electronic Rate and Form Filings (“SERFF”) for merged market coverage proposed to be issued or renewed between January 1, 2024 and December 31, 2024 (i.e., CY2024). The Division also noted in Filing Guidance Notice 2023-B that Carriers are expected to submit the CY2024 Plan and Benefits Template and the Plan ID Crosswalk Template to the SERFF Plan Binder by no later than May 15, 2023, as noted in Filing Guidance Notice 2023-A.

Rate Filing Summary for CY2024

As noted in 211 CMR 66.08(3)(c), “each Carrier shall submit a rate filing summary that will be available for public inspection while the rate filing is reviewed by the Division.” The rate filing summary is to include items identified in 211 CMR 66.08(3)(c)1.-9. in a format determined by the Commissioner.

The rate filing summary is to be submitted within the SERFF rate filing for individual business (as referenced in Filing Guidance 2023-C). A separate health filings requirement called “Merged Market Rate Filing Summary Documents” has been newly added to SERFF for this purpose, within the “Supporting Documents” schedule; the following documents should be submitted to that section:

1. Narrative comments as set forth in the document accompanying this Filing Guidance Notice entitled “Merged Market Rate Filing Summary.” Please note that the attachment identifies the suggested number of paragraphs to include for each of the listed sections. [in pdf format]

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2. The Plan and Benefits template(s) as submitted to the binders. [in excel format]
3. The worksheet tab called “Exhibit for Public Release” extracted from the Data Collection Tool. [stored in pdf format]

Review of Rate Filing Summary

Once submitted to SERFF, the Division will review the rate filing summary documents for consistency with the related rate filing and the instructions within this filing guidance. The Division may contact Carriers to modify the materials in the submitted rate filing summary. Once complete, the Division will upload each Carrier’s rate filing summary to the Division’s website by May 30th, which is ten business days after the May 15th filing date.

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.

MERGED MARKET RATE FILING SUMMARY
(211 CMR 66.08(3)(c))
[Document expected to be no more than to 5 pages]

OVERVIEW OF THE FILING

Name of Company: [full legal name]

Actuary Responsible for Filing:

Coverage Period for Rates Filed: issued/renewed in CY[2024]

Number of Plans Filed:

Number of Renewing Individuals and Dependents:

Number of Renewing Small Groups:

Number of Renewing Small Group Members:

Overall Average Proposed Rate Change over Prior Period: [in percent, to 1 decimal place]

KEY DRIVERS FOR THE PROPOSED RATE CHANGE

[3-4 bullets or paragraphs that describe key drivers for the proposed change]

See accompanying file called “Exhibit for Public Release” for additional detail.

SUMMARY OF COST-SHARING AND BENEFITS

See accompanying file called “Exhibit for Public Release.”

GENERAL METHODOLOGY FOR ESTABLISHING RATES OF REIMBURSEMENT

[Two-three paragraphs that describe the following:

“An explanation of the general methodology for establishing rates of reimbursement for providers any proposed changes in the methods of paying providers or provider contracting initiatives; the basis for paying similarly situated providers within a provider network different rates of reimbursement including, but not limited to, quality of care delivered, mix of patients, geographic location at which care is provided; and any non-fee-for-service and non-capitation payments to providers included in the rate filing, including, but not limited to, bonuses and incentives tied to provider performance and other payments not tied to service or performance”]

SUMMARY OF ADMINISTRATIVE EXPENSES

See accompanying file called “Exhibit for Public Release.”

MEDICAL LOSS RATIOS

See accompanying file called “Exhibit for Public Release.”

CONTRIBUTION TO SURPLUS

[One paragraph that describes the following:

“Contribution to surplus and the reasons that the Carrier filed at that level”]

DIFFERENCES FROM FILED FINANCIAL STATEMENT

[One-two paragraphs that describes the following:

“An explanation of how or why information contained in the rate filing is different from information contained in the Carrier’s filed financial statements”]

COST CONTAINMENT PROGRAMS

[Up to five paragraphs that describe the following:

“A description of cost containment programs the Carrier is employing to address health care delivery costs and a summary of the realized past savings and projected savings and projected savings from all such programs”]