



COMMONWEALTH OF MASSACHUSETTS

Office of Consumer Affairs and Business Regulation

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HEALTH COVERAGE Filing Guidance Notice 2024-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 19, 2024

RE: CY2025 Rate Filings with URRT Information

This Filing Guidance Notice informs insurance carriers (“Carriers”) regarding the inclusion of Unified Rate Review Template (“URRT”) materials with the submission of CY2025 rate filings. This Filing Guidance Notice highlights the need for two 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 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 require 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 that the URRTs to be submitted to HIOS require the inclusion of geographic rating factors.

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 all 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 should be submitted in the URRT tab. **Do not include the URRT with rating factors anywhere else in this SERFF submission.**
- Small group and individual URRTs that do **not** include the rating factors worksheet should be posted to the “Unified Rate Review Template - PUBLIC VERSION” section of the Supporting Information tab.
- Create a second SERFF submission 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.** No filing fee is required for this submission, as the only purpose of this filing will be to forward the small group URRT to HIOS.

To summarize:

Item	Location in SERFF
Complete Individual URRT+ narrative	Full-blown rate filing, URRT tab
Individual URRT – no rating factors	Full-blown rate filing, Supporting Information tab, “Unified Rate Review Template - PUBLIC VERSION” sub-section
Small Group URRT – no rating factors	Full-blown rate filing, Supporting Information tab, “Unified Rate Review Template - PUBLIC VERSION” sub-section
Complete Small Group URRT + narrative	URRT-only filing, URRT tab

If you have any questions about the content of this Filing Guidance Notice, please contact Mary Hosford at mary.hosford@mass.gov.