



**COMMONWEALTH OF MASSACHUSETTS**  
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**HEALTH COVERAGE**  
**Filing Guidance Notice 2025-K**

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

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

**DATE:** March 31, 2025

**RE:** Rate Filings for CY2026 – Alternative Scenarios: Expiration of Enhanced Premium Subsidies and ConnectorCare Expansion Pilot

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This Filing Guidance Notice instructs insurance carriers (“Carriers”) regarding how to address the expiration of enhanced federal premium subsidies (associated with the American Rescue Plan Act of 2021 and Inflation Reduction Act of 2022), as well as the expiration of the ConnectorCare expansion pilot (coverage for members between 300 and 500% FPL) in materials to be submitted for rates to take effect in Calendar Year 2026 (CY2026). Both policies sunset at the end of 2025 under current federal and state law, respectively, without further legislative action.

Given the uncertainty as to whether such subsidies will be extended into CY2026, the DOI requires Carriers to submit 3 versions of their proposed rate increase within their merged market rate filing<sup>1</sup>, as follows:

1. The official requested rate increase, Data Collection Tool (“DCT”) and URRT located in, respectively, the Rate/Rule Schedule, Supporting Documentation, and URRT tabs, and related supporting documents, should assume that both programs will not be continued in CY2026.
2. An alternative proposed rate change will need to be included within the Supporting Documentation tab, as follows:  
Carriers should submit an additional DCT Tab 66.08(2)(a) with rates that assume restoration of the enhanced premium subsidies, as well as a memo/exhibit outlining the assumptions that changed under the alternative scenario. A sub-section within the Supporting Information tab will be created for this purpose. An alternative URRT is NOT necessary at this time, but it will be needed (along with other filing material including a full revised DCT and actuarial memo) if the alternative scenario materializes; the DOI will provide direction at that time.
3. A third proposed rate change will need to be included within the Supporting Documentation tab, as follows:  
Carriers should submit an additional DCT Tab 66.08(2)(a) with rates that assume continuation of the

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<sup>1</sup> Alternative scenarios are not required in the accompanying “URRT-only” submission. These URRTs will be finalized at the end of the rate review process, as usual.

ConnectorCare Pilot, as well as a memo/exhibit outlining the assumptions that changed under the alternative scenario. A sub-section within the Supporting Information tab will be created for this purpose. An alternative URRT is NOT necessary at this time, but it will be needed (along with other filing material including a full revised DCT and actuarial memo) if the alternative scenario materializes; the DOI will provide direction at that time.

If you have any questions about this Notice, please contact Mary Hosford at 617-521-7358 or [mary.hosford@mass.gov](mailto:mary.hosford@mass.gov)