



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

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**HEALTH COVERAGE**  
**Filing Guidance Notice 2025-B**

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

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

DATE: February 3, 2025

RE: Rate Filings for CY2026

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This Filing Guidance Notice informs insurance carriers (“Carriers”) regarding the timing and content of rate filing materials to be submitted for rates to take effect in Calendar Year 2026 (CY2026). This Filing Guidance Notice identifies rules that the Massachusetts Division of Insurance (“Division”) finds necessary and appropriate to enable timely submission and review of merged market rate filings for the CY2026 rating period.

**Timing of Filings**

**Rate Filings for CY2026**

In addition to what is expected to be in a rate filing, Carriers are expected to submit the CY2026 Plan and Benefit Template and Plan ID Crosswalk Template to the SERFF Plan Binder by no later than May 15, 2025. Carriers are to submit rate filings via SERFF for merged market coverage proposed to be issued or renewed between January 1, 2026, and December 2026 (CY2026) by no later than May 15, 2025. Carriers are expected to submit such rate filings using the data collection tool (“DCT”) template that is being transmitted separately for each company offering merged market products. The Division will review these rate filings and will respond to Carriers regarding the status of these filings.

**Induced Demand Factors**

As noted in Filing Guidance Notice 2024-A, when developing plan-specific benefit level rate adjustment factors (“AV and Cost Sharing Design of Plan Factors” or “Pricing Actuarial Values”), according to federal Affordable Care Act rules, Carriers are to base such factors on cost-sharing and benefit factors and induced demand factors (IDFs) that represent the relative induced demand associated with the benefit plans.

For CY2026 rate filings, it is expected that Carriers’ rate filings will adhere to the following:

- The ratio of the highest IDF to the lowest IDF is to be capped at 1.45.

The Division will continue to collect IDF and cost-sharing and benefit factor information from Carriers and other parties in the course of evaluating its expectations for filings after CY2026. Although it will be confirmed in a future Filing Guidance Notice, it is the Division's current expectation that Carriers' CY2027 rate filings will adhere to the following:

- The ratio of the highest IDF to the lowest IDF is to be capped at 1.35.

For cost-sharing and benefit factors, the Division does not expect that any Carrier's cost-sharing and benefit factors will change significantly from those used for the prior calendar year (outside of changes related to specific cost sharing and benefit changes). If a Carrier intends to make significant changes to the cost-sharing and benefit factors and the slope of those factors for CY2026, the Division expects that the Carrier will contact the Division by no later than April 15, 2025 to discuss any such change in advance of the Carrier submitting its CY2026 rate filing.

The Division will be monitoring both the IDFs and the cost-sharing & benefit factors used in CY2026 filings in order to ensure compliance with guidelines in Filing Guidance Notice 2025-B.

### **Rate Filing Summary**

Carriers are required to submit a rate filing summary along with calendar year filings, as outlined in 211 CMR 66.08(3)(c). Carriers should ensure that the section of the DCT associated with the rate filing summary and the Binder Plan and Benefit Template are complete and submitted by May 15. As was noted previously in this guidance, the Division will forward the DCT for CY2026 in a separate transmission.

If you have any questions about this Notice, please contact Kevin Beagan at 617-521-7323 or [kevin.beagan@mass.gov](mailto:kevin.beagan@mass.gov).