



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

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FILING GUIDANCE NOTICE 2025-H

TO: Commercial Health Insurers; Blue Cross Blue Shield of Massachusetts, Inc.; and Health Maintenance Organizations Offering or Renewing Insured Health Products in Massachusetts (“Carriers”) subject to M.G.L. c. 176O

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

DATE: March 4, 2025

RE: Coverage of GLP-1 Drugs

The Division of Insurance (“Division”) distributes this Filing Guidance Notice 2025-H to provide guidance to insured health carriers (“Carriers”) regarding coverage within insured health plans issued or renewed in Massachusetts for GLP-1 (Glucagon-Like Peptide-1 Receptor Agonist) drugs for diabetes and weight loss.

Treatment for Diabetes

The Division expects that GLP-1 drugs that are FDA-approved to treat diabetes are to be included on the Carrier’s formulary as part of covered services for medically necessary treatment of members diagnosed with Diabetes Mellitus.

Treatment for Weight Loss

Carriers may in their discretion choose to provide coverage for GLP-1 drugs for products issued or renewed in Calendar Year 2026 for non-diabetic patients to treat weight loss and associated comorbidities. Carriers may in their discretion choose to submit filings that propose to limit coverage for GLP-1 drugs for products issued or renewed in Calendar Year 2026 for non-diabetic patients to treat weight loss and associated FDA-approved comorbidities for sleep apnea and cardiovascular disease, provided that the Carrier adheres to the following conditions:

- Carriers will update their websites and appropriate written materials to explain the noted conditions and provide clear information to network providers regarding the conditions that apply to coverage for GLP-1 prescription drugs.
- Carriers will notify all non-diabetic covered persons who are currently taking GLP-1 drugs about the conditions that apply for coverage that is issued or renewed for Calendar Year 2026 and must also update their websites and appropriate written materials to explain the noted conditions and provide clear information to members.

- Carriers that employ utilization management concerning coverage of GLP-1 drugs must do so in a manner consistent with M.G.L. c. 176O, section 12.

The Division will continue to monitor use of GLP-1 drugs in 2026 and will provide additional guidance that may apply to coverage issued or renewed after Calendar Year 2026.

Filing Requirements

As required under 211 CMR 52.05(7), Carriers are reminded that they must submit material change materials - including the Carrier's Evidence of Coverage as described in 211 CMR 52.05(4)(i) - that are to be part of insured health coverage offered or renewed in Massachusetts. Carriers must forward all form filings to update the Evidence of Coverage on file using SERFF (the System for Electronic Rate and Form Filing), with the SERFF Project Name: GLP-1 Coverage.

Carriers are expected to review and modify their utilization systems to ensure that requests for the required services are processed in accordance with the medically necessary requirements identified in M.G.L. c. 176O and 211 CMR 52.00, including required review of utilization requests within statutory timeframes, notification of all utilization review decisions, and notification to members regarding their rights to internal and external appeals when there has been an adverse determination of a request for services.

If you have any questions about Filing Guidance Notice 2025-H, please contact Niels Puettthoff at Niels.Puettthoff@mass.gov.