

Issuer Guidance: Optional Small Group Quarterly Medical and Dental Rate Revisions for Plan Year 2025

This is Plan Year 2025 (PY 2025) issuer guidance for submitting optional medical and dental quarterly rate revisions. DIFS will again be permitting revisions to quarterly rates starting with the 2nd quarter 2025. The timelines, requirements, and relevant guidance for submitting revisions to small group rates for 2025 are as follows:

Filing Timelines:

- ***Revision of 2nd Quarter Small Group Rates – Due December 23, 2024***

Issuers wishing to revise their 2nd quarter small group rates must submit a new SERFF rate filing and request their binder be reopened by DIFS. Per the PY 2025 Bulletin, appropriate documents should be submitted in both the rate filing and binder no later than December 23, 2024. Once DIFS submits the URRT filing through SERFF it will transfer over to HIOS.

- ***Revision of 3rd and/or 4th Quarter Small Group Rates – Due March 18, 2025***

Issuers wishing to revise their 3rd and/or 4th quarter small group rates must submit a new SERFF rate filing and request their binder be reopened by DIFS. Per the PY 2025 Bulletin, appropriate documents should be submitted in both the rate filing and binder no later than March 18, 2025.

Issuers are no longer required to submit a corresponding HIOS filing. Once DIFS submits the URRT filing through SERFF it will also transfer over to HIOS.

****NOTE** – As in prior years DIFS will **not** provide a separate filing window for revisions to 4th quarter rates due to timing conflicts with the 2026 annual filing. Issuers wishing to revise 4th quarter rates *only* should submit their revisions by March 18, 2025.

Filing Requirements:

- Issuers must submit new rate filings in SERFF following the guidance in PY 2025 Bulletins (see links below). If applicable form changes are needed, please submit those simultaneously. New benefit designs will not be permitted.
- Filings must include rate revisions for subsequent quarters, adjusted only for trend. For example, 2nd quarter filings must include revised 3rd and 4th quarter rates adjusted only for trend from the revised 2nd quarter rates.
- If the proposed increase for any medical product exceeds the federal rate review threshold, a Part II Written Description Justifying the Rate Increase is required.
- Federal templates are required for quarterly rate filings:
 - o **Medical:** Rates, Business Rules, Part I Unified Rate Review, Part II Written Description Justifying the Rate Increase (if applicable), Part III Actuarial Memorandum.
 - o **Dental:** Rates, Business Rules

- These templates must be uploaded to both the rate/form filing and the binder.
- The Rates Template must include **all four (4) quarters of rates**, not just the quarters being revised.

Links to Relevant Guidance:

[DIFS PY2025 Medical Bulletin](#) (Medical)

[DIFS PY2025 SADP Bulletin](#) (Stand-Alone Dental)

[Unified Rate Review User Guide](#)