Speed to Market Tools for Individual and Small Group Health Plan Rate Filings

**Purpose:** Speed to Market (STM) Tools provide guidance for preparing a filing. Although following this guidance does not guarantee that your filing will be approved, it will expedite our review process.

# Who should use this document?

**Applicable Licenses:** HCSCs, HMOs, and Disability Issuers.

**Applicable TOIs:** H16I, HOrg02I, H16G, or HOrg02G.

**Other Information:** Both non-grandfathered and grandfathered health plans.

# Speed to Market Information

## General Information

### Per WAC 284-43-0200, all 2026 filings for individual health plans, small group health plans, and stand-alone dental plans that provide pediatric dental benefits as one of the essential health benefits must be filed by May 15, 2025. Issuers will be permitted to amend filings only at the direction of the commissioner. Filings not timely submitted will be rejected without review.

### Carriers should NOT submit rate filings based on proposed rules.

### Public Information: All rate filings submitted under this section are for-public rate filings. [RCW 48.02.120(4)]

### Experience: Under 45 CFR §156.80, the experience of all non-grandfathered individual plans must be pooled together for rating purposes, and the experience of all non-grandfathered small group plans must be pooled together for rating purposes.

### In SERFF, the top section of the Rate/Rule Schedule tab should be populated, as appropriate, with detailed information related to the prior rate filing.

### In SERFF, except for the rate schedules that need to be in the Rate/Rule Schedule tab, all other supporting documentation and information should be attached under the Supporting Documentation tab or the URRT tab. The URRT tab also carries out a web service between SERFF and the Health Insurance Oversight System Unified Rate Review (HIOS URR) module. The service will be a gateway between NAIC and CMS for all URR documents, and these items will be automatically transferred to CMS when information is submitted to the state. Carriers are expected to follow the procedures provided by SERFF and CMS related to the documents required to be loaded in the URRT tab. **NOTE THE EXCEPTION TO THIS GUIDANCE WHEN A SECOND SET OF RATES IS SUBMITTED DUE TO UNCERTAINTY OF ARPA SUBSIDIES, AS EXPLAINED BELOW.**

## Health Plans for Non-grandfathered Individual and Small Groups Offered, Issued, or Renewed on or after January 1, 2026

### In SERFF, the top section of the Rate/Rule Schedule tab should be populated, as appropriate, with detailed information related to the prior rate filing.

### **STM - Rate Schedule Format:** Include a complete rate schedule in Excel file format and a PDF version of the Excel file. [See WAC 284-44A-060(2)(a), WAC 284-46A-060(2), WAC 284-58-033(2)]

#### Name the PDF file “Rate Schedule” and the Excel file “Rate Schedule Duplicate.xlsx.”

#### Use the appropriate rate schedule formatting file listed below to create your Excel rate schedule file ([OIC website](https://www.insurance.wa.gov/filing-instructions)):

##### For Individual: Format - Rates - 2026 Individual Nongrandfathered Health Plan Rate Schedule.

##### For Small Group: Format - Rates - 2026 Small Group Nongrandfathered Health Plan Rate Schedule.

### **STM – Experience Summary Format:** Complete and attach, in both Excel and PDF formats, the individual and small group rate filing summary for WAC 284-43-6660.

#### All issuers (HCSCs, HMOs, and disability carriers) are required to submit the individual and small group rate filing summary for WAC 284-43-6660.

#### Use the Excel formatting file: Format-Rates-WAC 284-43-6660 Summary Duplicate.xlsx ([OIC website](https://www.insurance.wa.gov/filing-instructions)).

#### Name the files “WAC 284-43-6660.pdf” and “WAC 284-43-6660 Duplicate.xlsx.”

### **STM – Filing Checklists and Certifications:** Complete and attach the following documents.

#### Uniform Product Modification Justification:

#### Checklist - RF - 2026 Individual Medical Uniform Product Modification Justification or Checklist - RF - 2026 Small Group Medical Uniform Product Modification Justification, as applicable ([OIC website](https://www.insurance.wa.gov/filing-instructions)).

Submit this Uniform Product Modification Justification (UPMJ) as a separate document in both PDF and Excel formats (the PDF file must exactly match the Excel file). The Excel file name must match the PDF file name except the Excel file name must end with “Duplicate.xlsx.”

#### For individual filings ([OIC website](https://www.insurance.wa.gov/filing-instructions)):

##### Checklist - Rates - 2026 Individual Nongrandfathered Health Plans

##### Format - Rates - 2026 Individual and Small Group Health Exhibits

##### Certification - Rates - 2026 Mental Health and Substance Use Disorder Financial Reqs

##### Checklist - Rates - 2026 Individual Supplemental Checklist for 1332 Waiver Reporting

##### MHSUD Parity Calculation: Use the OIC’s Excel file template “Certification-Rates – 2026 MSHUD Parity Calculations.” Check the Parity Certification (Word) document for Mental Health and Substance Use Disorder Financial Requirements for additional instructions.

##### Submit both PDF and Excel formats (the PDF file must exactly match the Excel file). The Excel file name must match the PDF file name except the Excel file name must end with “Duplicate.xlsx.”

#### For small group filings ([OIC website](https://www.insurance.wa.gov/filing-instructions)):

##### Checklist - Rates - 2026 Small Group Nongrandfathered Health Plans

##### Format - Rates - 2026 Individual and Small Group Health Exhibits

##### Certification - Rates - 2026 Mental Health and Substance Use Disorder Financial Reqs

##### MHSUD Parity Calculation: Use the OIC’s Excel file template “Certification-Rates - 2026 MSHUD Parity Calculations.” Check the Parity Certification (Word) document for Mental Health and Substance Use Disorder Financial Requirements for additional instructions.

##### Submit both PDF and Excel formats (the PDF file must exactly match the Excel file). The Excel file name must match the PDF file name except the Excel file name must end with “Duplicate.xlsx.”

### **STM – Benefit Components Format**: Complete and attach the following document.

#### Use the Excel formatting file: Format - Rates - 2026 Med Benefit Components.xlsm.

#### Submit the Benefit Components as a separate document in both PDF and Excel formats (the PDF file must exactly match the Excel file). Delete the Illustrative Example worksheet from the document before submitting. We recommend that you do not delete the Instructions tab, as doing so will also remove the buttons that allow you to add blank template worksheets and to correctly name the worksheets. Name the files “Benefit Components.pdf” and “Benefit Components Duplicate.xlsx.”

### **For information related to the new plan year 2026 benchmark plan for Nongrandfathered health plans, please see the** [**OIC website**](https://links-2.govdelivery.com/CL0/https%3A//www.insurance.wa.gov/essential-health-benefits-benchmark-plan)**.**

#### <https://www.insurance.wa.gov/essential-health-benefits-benchmark-plan>

### **Second set of rates due uncertainty related to expanded American Rescue Plan Act (ARPA) subsidies:**

#### **Applicability:** This subsection **only** applies to plan year 2026 rate filings submitted for individual health plans that include plans offered on the Exchange.

#### **Assumptions:**

##### The rate filing documents detailed in the sections above (the ***default*** set of documents) must assume that ARPA subsidies are NOT extended through PY2026.

##### The rates detailed in this section assumes that ARPA subsidies are extended through PY2026.

#### **Documentation:**

##### Load the documents identified below in their own section of the Supporting Documentation tab in SERFF and name the section “Rating Documents for Extended ARPA Subsidies”.

##### You must include at least a

###### Rate Schedule,

###### Part I Unified Rate Review Template,

###### An actuarial memo identifying the key assumptions and material factors that differ from the default set of rates due to the expanded premium tax credit extension, and

###### An actuarial certification for these rates.

#### **File Naming:**

##### Name the files the same as the default documents, except append the phrase “with ARPA extension” to the file name.

##### Ensure you include “with ARPA extension” on both the PDF and the Excel versions, where applicable, and include “duplicate” in the Excel file’s name.

#### **Process:**

##### Do NOT update the documents submitted under this subsection when responding to objections during the normal review process unless the objection specifically requests it.

##### Do NOT update the Company Rate Information and Rate Review Detail unless an objection specifically requests it.

##### If ARPA subsidies are extended during review, the OIC will send an objection directing you to replace the default rating documents with documents from this section. The objection will also provide instructions for updating these documents for changes that occurred during review.

##### The rate filing must only include one set of final rates. You will receive an objection directing you to deactivate the second set of rate files prior to submitting a disposition in the rate filing.

### Other Important Filing Guidance

#### Public Information

##### Per RCW 48.02.120(4), all non-grandfathered individual and small group rate filings are subject to public inspection.

#### Experience:

##### Under 45 CFR §156.80, the experience of all non-grandfathered individual plans must be pooled together for rating purposes, and the experience of all non-grandfathered small group plans must be pooled together for rating purposes.

## For Grandfathered Individual and Small Group Health Plans Renewed on or after January 1, 2014

### Scope of Section by TOI in SERFF: H16G, H16I, HOrg02G, or HOrg02I.

### In SERFF, the top section of the Rate/Rule Schedule tab should be populated, as appropriate, with detailed information related to the prior rate filing.

### Provide one or more Excel workbooks including all built-in formulas and internal links used to generate the rate changes. For each Excel workbook, you must provide a PDF file that displays all contents of the Excel file. The PDFs must contain all hidden cells and worksheets from the Excel files. The Excel file names must end with “Duplicate.xlsx”.

### Other Important Filing Guidance

#### All state community rating requirements under RCW 48.20.028, 48.21.045(3), 48.44.022, 48.44.023(3), 48.46.064, and 48.46.066(3) apply to grandfathered health plans only. Federal Community rating requirements under 45 CFR §147.102 apply to non-grandfathered health plans. Per RCW 48.02.120(4), except for the numeric values of the small group rating factors as authorized by RCW 48.21.045(3)(a), 48.44.023(3)(a), and 48.46.066(3)(a) and unique new products specifically approved by the Commissioner, all individual and small group rate filings are subject to public inspection.

#### Experience:

##### Under the state community rating requirements, the experience of all grandfathered individual plans must be pooled together for rating purposes, and the experience of all grandfathered small group plans must be pooled together for rating purposes.

# Contact Us

### For filing related questions, contact the Rates, Forms, and Provider Networks Help Desk:

(360) 725-7111

rfhelpdesk@oic.wa.gov

### For feedback or suggestions, email us:

RFHealthplan@oic.wa.gov