

Key Dates for Calendar Year 2024:¹
 Qualified Health Plan (QHP) Data Submission and Certification;²
 Rate Review; Form Review; and Risk Adjustment

Table 1. QHP Data Submission and Certification Timeline

Activity	Dates
QHP Application submission and data validation window opens	4/17/24
Early Bird Application Deadline: Optional Early Bird deadline for issuers to submit QHP Applications to CMS	5/15/24
CMS reviews Early Bird QHP Application data and releases results for issuers and states to review	4/18/24 – 6/7/24
HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS on behalf of the issuer. ³	5/17/24
Initial Application Deadline: Initial deadline for issuers to submit QHP Applications to CMS, including Plan ID Crosswalk data	6/12/24
QHP issuers submit the validated Quality Rating System (QRS) clinical measure data, with attestation, to CMS via NCQA’s Interactive Data Submission System (IDSS). ⁴	6/14/24
CMS reviews initial QHP Applications and releases results for issuers and states to review	6/13/24 – 7/12/24
Secondary Application Deadline: Deadline for issuers to submit their QHP Application Rates Table Templates to CMS; optional deadline for issuers to submit corrected QHP Application data to CMS	7/17/24
CMS reviews Rates Table Template data and resubmitted QHP Application data, and releases results for issuers and states to review	7/18/24 – 8/9/24
Issuers, Exchange administrators, and CMS preview the 2024 QHP quality rating information. ⁵	Aug./Sep. 2024
Issuer Plan Confirmation/Crosswalk Deadline: Issuers complete final plan confirmation and submit final Plan ID Crosswalk Templates	8/7/24 – 8/21/24
Final Application Deadline: Deadline for issuers to submit changes to their QHP Applications	8/14/24
CMS reviews QHP Applications and releases results for issuers and states to review	8/15/24 – 9/9/24
CMS sends QHP Certification Agreements to issuers	9/10/24
QHP Agreement Signing Deadline: Issuers return signed QHP Certification Agreements to CMS	9/10/24 – 9/18/24
State Plan Confirmation Deadline: States complete final plan confirmation	9/10/24 – 9/18/24
Limited data correction window	9/12/24 – 9/13/24

¹ These dates are subject to change. All dates are from the PY 2025 QHP Data Submission and Certification Timeline Bulletin, available at <https://www.cms.gov/files/document/py2025-qhp-data-submission-and-certification-timeline-bulletin.pdf>.

² These dates apply to QHPs in states with Exchanges that use the Federal platform. This includes QHPs in Federally-facilitated Exchanges (including where the state performs plan management functions) and State-based Exchanges on the Federal platform.

³ *QRS and QHP Enrollee Survey Technical Guidance for 2024*, available at <https://www.cms.gov/files/document/qrs-and-qhp-enrollee-survey-technical-guidance-2024.pdf>.

⁴ Each QHP issuer must submit and plan-lock its QRS clinical measure data by May 31 to allow the HEDIS® Compliance Auditor sufficient time to review, approve, and audit-lock all submissions by the June 14 deadline. There are no fees for QHP issuers associated with accessing and using the IDSS.

⁵ The term “QHP quality rating information” includes the QRS scores and ratings and the QHP Enrollee Survey results.

Machine-Readable/URL Deadline: Deadline for issuers' machine-readable data to be posted and marketing URLs to be live and active	9/18/24
CMS releases certification notices to issuers and states	10/1/24-10/2/24
Anticipated public display of QHP quality rating information	11/1/24
Open Enrollment begins	11/1/24

Table 2. Rate Review for Single Risk Pool Coverage^{6,7}

Activity	Dates
Deadline for issuers in states without an Effective Rate Review Program to submit proposed rate filing justifications to CMS in the Unified Rate Review (URR) module of HIOS	6/3/24
Deadline for issuers in states with an Effective Rate Review Program to submit proposed rate filing justifications to CMS and the state ^{8, 9}	7/17/24
Target date on which CMS will post proposed rate changes ¹⁰	8/1/24
Deadline for states with an Effective Rate Review Program to post proposed rate increases subject to review (or link to ratereview.healthcare.gov for such information)	8/1/24
Deadline for Effective Rate Review states with Exchanges served by the HealthCare.gov platform to finalize determinations for rate filing justifications <u>that include a QHP</u> ¹¹	8/14/24
CMS finalizes determinations for rate filing justifications that include a QHP from issuers in states without an Effective Rate Review Program	8/14/24

⁶ All dates are from the *Bulletin: Timing of Submission of Rate Filing Justifications for the 2024 Filing Year for Single Risk Pool Coverage Effective on or after January 1, 2025*, available at <https://www.cms.gov/files/document/2024-final-rate-review-bulletin.pdf>.

⁷ The term "single risk pool coverage" is used to describe non-grandfathered health insurance coverage in the individual or small group (or merged) markets that is subject to the single risk pool provisions at 45 CFR 156.80 and is required to submit rate information using the Unified Rate Review Template.

⁸ In states with an Effective Rate Review Program, a rate filing or determination that is filed through the National Association of Insurance Commissioners (NAIC) System For Electronic Rates & Forms Filing (SERFF) and automatically uploaded to the URR module of HIOS will be considered filed with CMS once the upload is successful. This functionality does not apply to states that do not participate in SERFF. Issuers in those states will need to continue to submit rate filing justifications directly in the URR module of HIOS.

⁹ States with an Effective Rate Review Program may establish a different submission deadline for proposed rate filing justifications, as long as the deadline is no later than the federal deadline (July 17, 2024). States with an Effective Rate Review Program may also establish a submission deadline for proposed rate filing justifications that include a QHP that differs from the deadline for proposed rate filing justifications that include only non-QHPs, as long as both deadlines are no later than the federal deadline (July 17, 2024).

¹⁰ CMS will post rate filing information for all single risk pool coverage with rate changes (including both QHPs and non-QHPs), regardless of whether the product includes a plan with a rate increase that is subject to review under 45 CFR 154.210. CMS will not post information that is a trade secret or confidential commercial or financial information as defined in HHS's Freedom of Information Act regulations at 45 CFR 5.31(d).

¹¹ States with an Effective Rate Review Program that participate in SERFF must enter in SERFF the applicable final determination, which will then be automatically uploaded to the URR module of HIOS. States with an Effective Rate Review Program that do not participate in SERFF must enter the applicable final determination directly in the URR module of HIOS. There are three final determination statuses. All submissions that do not have any rate increases subject to review (rate increases less than 15%) must be in a status of "Rate Filing Accepted." For submissions with rate increases that are subject to review (rate increase of 15% or greater), the submission must be in a status of "Review Complete" if the rate increase received a determination of "not unreasonable," or in a status of "Final Justification Submitted" if the rate increase received a determination of "unreasonable" and the issuer has submitted the final justification.

Deadline for Effective Rate Review states with a State-based Exchange that does not use the HealthCare.gov platform to finalize determinations for rate filing justifications that include a QHP ¹²	10/15/24
Deadline for Effective Rate Review states to finalize rate filing justifications <u>that only contain non-QHPs</u> ¹³	10/15/24
CMS finalizes determinations for rate filing justifications that only contain non-QHPs from issuers in states without an Effective Rate Review Program	10/15/24
Target date on which CMS will post <u>all</u> final rate changes. ¹⁴	11/1/24

Table 3. Federal Form Review

Activity	Dates
Deadline for issuers in states where CMS is enforcing certain Consolidated Appropriations Act, 2021 (CAA) and/or Affordable Care Act (ACA) provisions to submit form filings (QHP and non-QHPs) to CMS ^{15, 16, 17}	5/15/24
Deadline for QHP forms to be finalized	8/14/24
Deadline for QHP URLs to be live and active	9/18/24
Deadline for non-QHPs forms to be finalized	10/15/24
Deadline for non-QHPs URLs to be live and active	11/1/24

Table 4. Risk Adjustment for Benefit Year 2023
and Risk Adjustment Data Validation for Benefit Years 2022 and 2023

Activity	Dates
Interim 2023 Benefit Year Risk Adjustment Report Released	March 2024
2022 Benefit Year Risk Adjustment Data Validation Error Rates Released	May 2024
Summary Report of 2022 Benefit Year Risk Adjustment Data Validation Adjustments to Risk Adjustment Transfers Released	May 2024. ¹⁸

¹² Ibid.

¹³ Ibid.

¹⁴ CMS will post rate change information for all single risk pool coverage final rate filings. CMS will not post information that is a trade secret or confidential commercial or financial information, consistent with HHS's Freedom of Information Act regulations at 45 CFR 5.31(d).

¹⁵ In order to ensure compliance with the applicable provisions of the CAA, health insurance issuers in Alabama, American Samoa, Arizona, Arkansas, Connecticut, Delaware, Florida, Guam, Hawaii, Illinois, Indiana, Louisiana, Massachusetts, Missouri, New Hampshire, Northern Mariana Islands, Oklahoma, Rhode Island, Tennessee, Texas, Virginia, and Wyoming must submit form filings for all health insurance products in the individual and group markets, including fully insured small group and large group market plans, student health insurance coverage, grandfathered plans, and plans subject to the non-enforcement policy ("grandmothered plans") to the CMS Direct Enforcement instance in SERFF at <https://login.serff.com/serff/>.

¹⁶ In addition to reviewing form filings for CAA compliance, CMS will also review form filings in Missouri, Oklahoma, Texas, and Wyoming for compliance with applicable ACA federal market reforms. Issuers in those four states must submit form filings for all non-grandfathered health insurance products in the individual and group markets, including fully insured small group and large group market plans and student health insurance coverage, to the CMS Direct Enforcement instance in the SERFF.

¹⁷ Forms for student health insurance products and products offered in the large group market are due 60 days prior to the coverage effective or renewal date.

¹⁸ CMS generally publishes this report in July; however, due to the 2023 benefit year risk adjustment EDGE data submission deadline extension until May 21, 2024, CMS can publish the Summary Report of 2022 Benefit Year Risk Adjustment Data Validation Adjustments to Risk Adjustment Transfers in May. Invoicing of these charges will occur on the normal schedule, in September.

Deadline for Submission of Final 2023 Benefit Year Risk Adjustment Data	05/21/2024. ¹⁹
2023 Benefit Year Risk Adjustment Data Validation Samples Released	June 2024
Summary Report of 2023 Benefit Year Risk Adjustment Transfers Released	07/22/2024. ²⁰
Collection of 2023 Benefit Year Risk Adjustment Charges Begins	August 2024
Collection and Payment of 2022 Benefit Year Risk Adjustment Data Validation Adjustments to Transfers and Default Data Validation Charges Begins	September 2024
2023 Benefit Year Risk Adjustment Payments Begin	September 2024

Table 5. Consolidated CY2024 Key Dates in Chronological Order

Table 5 below consolidates the dates provided in Tables 1-4 and does not contain any additional information beyond that which has been provided above.

Category	Activity	Dates
Risk Adjustment	Interim 2023 Benefit Year Risk Adjustment Report Released	March 2024
QHP Certification	QHP Application submission and data validation window opens	4/17/24
Risk Adjustment	2022 Benefit Year Risk Adjustment Data Validation Error Rates Released	May 2024
Risk Adjustment	Summary Report of 2022 Benefit Year Risk Adjustment Data Validation Adjustments to Risk Adjustment Transfers Released	May 2024
Form Review	Deadline for issuers in states where CMS is enforcing certain CAA and/or ACA provisions to submit form filings (QHP and non-QHPs) to CMS	5/15/24
QHP Certification	Early Bird Application Deadline: Optional Early Bird deadline for issuers to submit QHP Applications to CMS	5/15/24
QHP Certification	HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS on behalf of the issuer	5/17/24
Risk Adjustment	Deadline for Submission of Final 2023 Benefit Year Risk Adjustment Data	5/21/24
Risk Adjustment	2023 Benefit Year Risk Adjustment Data Validation Samples Released	June 2024
Rate Review	Deadline for issuers in states without an Effective Rate Review Program to submit proposed rate filing justifications to CMS in the Unified Rate Review (URR) module of HIOS	6/3/24
QHP Certification	CMS reviews Early Bird QHP Application data and releases results for issuers and states to review	4/18/24 – 6/7/24
QHP Certification	Initial Application Deadline: Initial deadline for issuers to submit QHP Applications to CMS, including Plan ID Crosswalk data	6/12/24
QHP Certification	QHP issuers submit the validated QRS clinical measure data, with attestation, to CMS via NCQA's IDSS	6/14/24
QHP Certification	CMS reviews initial QHP Applications and releases results for issuers and states to review	6/13/24 – 7/12/24

¹⁹ https://www.cms.gov/ccio/resources/regulations-and-guidance/downloads/by_2023_announcement_edge_data_submission_mlr_extension.pdf.

²⁰ Ibid.

QHP Certification	Secondary Application Deadline: Deadline for issuers to submit their QHP Application Rates Table Templates to CMS; optional deadline for issuers to submit corrected QHP Application data to CMS	7/17/24
Rate Review	Deadline for issuers in states with an Effective Rate Review Program to submit proposed rate filing justifications to CMS and the state	7/17/24
Risk Adjustment	Summary Report of 2023 Benefit Year Risk Adjustment Transfers Released	7/22/24
Risk Adjustment	Collection of 2023 Benefit Year Risk Adjustment Charges Begins	August 2024
Rate Review	Target date on which CMS will post proposed rate changes	8/1/24
Rate Review	Deadline for states with an Effective Rate Review Program to post proposed rate increases subject to review (or link to ratereview.healthcare.gov for such information)	8/1/24
QHP Certification	CMS reviews Rates Table Template data and resubmitted QHP Application data, and releases results for issuers and states to review	7/18/24 – 8/9/24
QHP Certification	Final Application Deadline: Deadline for issuers to submit changes to their QHP Applications	8/14/24
Rate Review	Deadline for Effective Rate Review states with Exchanges served by the HealthCare.gov platform to finalize determinations for rate filing justifications <u>that include a QHP</u>	8/14/24
Rate Review	CMS finalizes determinations for rate filing justifications that include a QHP from issuers in states without an Effective Rate Review Program	8/14/24
Form Review	Deadline for QHP forms to be finalized	8/14/24
QHP Certification	Issuer Plan Confirmation/Crosswalk Deadline: Issuers complete final plan confirmation and submit final Plan ID Crosswalk Templates	8/7/24 – 8/21/24
QHP Certification	Issuers, Exchange administrators, and CMS preview the 2024 QHP quality rating information	Aug./Sep. 2024
Risk Adjustment	Collection and Payment of 2022 Benefit Year Risk Adjustment Data Validation Adjustments to Transfers and Default Data Validation Charges Begins	September 2024
Risk Adjustment	2023 Benefit Year Risk Adjustment Payments Begin	September 2024
QHP Certification	CMS reviews QHP Applications and releases results for issuers and states to review	8/15/24 – 9/9/24
QHP Certification	CMS sends QHP Certification Agreements to issuers	9/10/24
QHP Certification	Limited data correction window	9/12/24 – 9/13/24
QHP Certification	QHP Agreement Signing Deadline: Issuers return signed QHP Certification Agreements to CMS	9/10/24 – 9/18/24
QHP Certification	State Plan Confirmation Deadline: States complete final plan confirmation	9/10/24 – 9/18/24

QHP Certification	Machine-Readable/URL Deadline: Deadline for issuers' machine-readable data to be posted and marketing URLs to be live and active	9/18/24
Form Review	Deadline for QHP URLs to be live and active	9/18/24
QHP Certification	CMS releases certification notices to issuers and states	10/1/24-10/2/24
Rate Review	Deadline for Effective Rate Review states with a State-based Exchange that does not use the HealthCare.gov platform to finalize determinations for rate filing justifications <u>that include a QHP</u>	10/15/24
Rate Review	Deadline for Effective Rate Review states to finalize rate filing justifications <u>that only contain non-QHPs</u>	10/15/24
Rate Review	CMS finalizes determinations for rate filing justifications that only contain non-QHPs from issuers in states without an Effective Rate Review Program	10/15/24
Form Review	Deadline for non-QHPs forms to be finalized	10/15/24
QHP Certification	Anticipated public display of QHP quality rating information	11/1/24
Rate Review	Target date on which CMS will post <u>all</u> final rate changes	11/1/24
Form Review	Deadline for non-QHPs URLs to be live and active	11/1/24
QHP Certification	Open Enrollment begins	11/1/24