STATE OF MISSOURI

DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 26-11

Health Insurance Revised Rate and Form Filings for Plan Year 2027

Issued: August 7, 2026

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: **All health carriers writing health insurance or health benefit plan coverage in Missouri**

From: **Angela L. Nelson, Director**

Re: **Revisions to Rate and Form Filings for Plan Year 2027 in response to the United States District Court for the District of Maryland in *City of Columbus v. Kennedy*, No. 26-2215 (D. Md.) July 16, 2026 Order**

The Department received notification from the Center for Consumer Information and Insurance Oversight at the Centers for Medicare and Medicaid Services ("CMS") on August 4, 2026, regarding CMS's expectations for Plan Year 2027 rate and form filings. This guidance was issued after the U.S. District Court for the District of Maryland issued an order in *City of Columbus v. Kennedy,* No. 26-2215 *("Columbus II")* on July 16, 2026, staying certain provisions of the Notice of Benefit and Payment Parameters for 2027 (91 FR 29256), including provisions related to standardized and non-standardized plans.

The Department strongly encourages health carriers to carefully review the bulletin[1] published by CMS on August 4, 2026, outlining a revised timeline for Qualified Health Plan ("QHP") data submission and certification for Plan Year 2027, as well as its letter, "Guidance on Standardized Plan Options and Non-Standardized Plan Option Limits and Exceptions in Light of Stay Order in *City of Columbus v. Kennedy*, No. 26-2215 (D. Md.)."[2] The bulletin and guidance outline CMS's expectations for carriers in ensuring compliance with prior regulations pursuant to the Court's Order.

In Missouri, CMS enforces the Affordable Care Act market-wide reforms. Therefore, pursuant to the August 4, 2026, guidance, health carriers must update their form filing submissions to comply with the requirements for standardized plan options by August 12, 2026. Carriers are reminded that such form filing revisions must be filed with both the Department and with CMS. Missouri is also an Effective Rate Review state and is therefore the primary regulator for rates. In order to comply with the revised timeline for making final rate determinations on August 28, 2026, the Department requests carriers to file revisions to their rates by noon (Central Time) on August 17, 2026.

To expedite the Department's review, the Department offers the following guidance to health carriers that need to make changes to their form and rate filings for Plan Year 2027 as a result of the federal guidance.

Form Revisions:

The action needed to update forms filed with the Department varies depending on whether the filing has been closed or is currently open. The following steps should be completed by August 12, 2026.

If the form filing has been closed:

- Email productfilings@insurance.mo.gov to request that a specific filing be reopened. Please include the SERFF tracking number, contact information, including name, telephone number, and extension number, if necessary, as well as the email address for priority filing inquiries from the Department.
- When you are notified that the filing has been reopened, promptly attach the revised forms under the Form Schedule tab. Please include redline versions

[1] https://www.cms.gov/files/document/updated-revised-py2027-qhp-data-submission-certification-timeline-bulletin.pdf

[2] https://www.cms.gov/files/document/plan-year-2027-standardized-plan-option-plan-designs.pdf

under the Supporting Documentation tab, along with all other documents that require changes, including but not limited to the Statement of Variability and an attestation that no other changes have been made, except those required revisions necessary to comply with the court's order.

If the form filing is currently open:

- Send a Note to Reviewer from within your SERFF form filing to let the reviewer know you will be revising the forms submitted in this filing. Please include contact information, including name, telephone number, and extension number, if necessary, as well as the email address for priority filing inquiries from the Department.

- Replace the necessary forms under the Form Schedule tab, attach redline versions under the Supporting Documentation tab and all other documents that require changes, including but not limited to the Statement of Variability and an attestation that no other changes have been made, except those required revisions necessary to comply with the court's order.

Rate Revisions

Please note that the only changes that can be made under this expedited review process are for the required revisions that carriers must make to comply with the court's order and any immediate downstream impacts resulting from those changes. Revisions to rate filings must be received by noon (Central Time) on August 17, 2026, and should include the following:

- Revised versions of any documents on the URRT tab in SERFF that are affected by any changes made;

- A redline version of the actuarial memorandum reflecting any updates;

- A concise overview of the actuarial memorandum changes and the rationale for such changes as they relate to the above-listed provisions;

- A copy of the Rate Table Template in an Excel format, filed in the Rate/Rule Schedule tab;

- Screenshots of the results of the Actuarial Value (AV) Calculator;

- An updated AV and Cost Sharing Design by Plan template; and

- An attestation that the only changes being made are for the required revisions that insurers must make to comply with the court's order and any immediate downstream impacts resulting from those changes.

Any questions or comments regarding this Bulletin should be directed to Camille Anderson-Weddle at 573-522-3311 or productfilings@insurance.mo.gov.

###