

Revised Key Dates for Calendar Year 2025:<sup>1</sup>  
Qualified Health Plan (QHP) Data Submission and Certification;<sup>2</sup>  
Rate Review; Form Review; and Risk Adjustment

Table 1. QHP Data Submission and Certification<sup>3</sup>

Activity	Dates
QHP Application submission and data validation window opens	4/16/25
CMS reviews QHP Application data as they are submitted and releases results for issuers and states to review	4/16/25 – 6/6/25
HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS on behalf of the issuer <sup>4</sup>	5/16/25
<b>Initial Application Deadline:</b> Initial deadline for issuers to submit QHP Applications to CMS, including Plan ID Crosswalk data	6/11/25
CMS reviews initial QHP Applications and releases results for issuers and states to review	6/12/25 – 7/11/25
QHP issuers submit the validated Quality Rating System (QRS) clinical measure data, with attestation, to CMS via NCQA's Interactive Data Submission System (IDSS) <sup>5</sup>	6/13/25
<b>Secondary Application Deadline:</b> 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	7/16/25
CMS reviews Rates Table Template data and resubmitted QHP Application data, and releases results for issuers and states to review	7/17/25 – 8/8/25
Issuers, Exchange administrators, and CMS preview the 2025 QHP quality rating information <sup>6</sup>	Aug./Sept. 2025
<b>Issuer Plan Confirmation/Crosswalk Deadline:</b> Issuers complete final plan confirmation and submit final Plan ID Crosswalk Templates	8/6/25 – 8/20/25
<b>Final Application Deadline:</b> Deadline for issuers to submit changes to their QHP Applications	8/13/25
CMS reviews QHP Applications and releases results for issuers and states to review	8/14/25 – 9/8/25

<sup>1</sup> This document summarizes key dates for calendar year 2025 regarding some activities and policies that are outlined in other documents. *Key Dates for Calendar Year 2025: Qualified Health Plan (QHP) Data Submission and Certification; Rate Review; Form Review; and Risk Adjustment* were originally published on December 31, 2024 at <https://www.cms.gov/files/document/cy-25-key-dates-tablesdocx508-compliant.pdf>. This document revises certain key dates listed in the December 31, 2024 version in response to *City of Columbus v. Kennedy*, No. 25-cv2114-BAH (D.Md.). See <https://www.qhpcertification.cms.gov/QHP/aboutthemarketplace/PY2026-QHP-Certification-Updates> for additional resources regarding plan year 2026 QHP certification updates in response to the litigation.

<sup>2</sup> 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.

<sup>3</sup> The information collection requests related to QHP Applications are approved under OMB control numbers 0938-1187, 0938-1295, 0938-1310, 0938-1415, and 0938-1461.

<sup>4</sup> *QRS and QHP Enrollee Survey Technical Guidance for 2025*, available at <https://www.cms.gov/files/document/qrs-and-qhp-enrollee-experience-survey-technical-guidance-2025.pdf>.

<sup>5</sup> Each QHP issuer must submit and plan-lock its QRS clinical measure data by May 30 to allow the HEDIS® Compliance Auditor sufficient time to review, approve, and audit-lock all submissions by the June 13 deadline. There are no fees for QHP issuers associated with accessing and using the IDSS.

<sup>6</sup> The term “QHP quality rating information” includes the QRS scores and ratings and the QHP Enrollee Survey results.

Limited data change window <sup>7</sup>	9/11/25 – 9/12/25
<b>NEW:</b> Additional opportunity for issuers to withdraw plans	9/16/25 – 9/25/25
<b>REVISED:</b> CMS sends QHP Certification Agreements to issuers	9/26/25
<b>REVISED: QHP Agreement Signing Deadline:</b> Issuers return signed QHP Certification Agreements to CMS	9/26/25 – 10/2/25
<b>REVISED: State Plan Confirmation Deadline:</b> States complete final plan confirmation	9/26/25 – 10/2/25
<b>NEW:</b> Limited data change window <sup>8</sup>	9/30/25 --10/1/25
<b>REVISED: Machine-Readable/URL Deadline:</b> Deadline for issuers' machine-readable data to be posted and marketing URLs to be live and active	10/2/25
<b>REVISED:</b> CMS releases certification notices to issuers and states	10/17/25
Anticipated public display of QHP quality rating information	11/1/25
Open Enrollment begins	11/1/25

Table 2. Rate Review for Single Risk Pool Coverage<sup>9, 10</sup>

Activity	Dates
Deadline for issuers in states <b>without</b> an Effective Rate Review Program to submit proposed rate filing justifications to CMS in the Unified Rate Review (URR) module of HIOS	6/2/25
Deadline for issuers in states <b>with</b> an Effective Rate Review Program to submit proposed rate filing justifications to CMS and the state <sup>11, 12</sup>	7/16/25
Date on which CMS posts proposed rate changes <sup>13</sup>	8/1/25
Deadline for states <b>with</b> an Effective Rate Review Program to post proposed rate increases subject to review (or link to <a href="https://www.healthcare.gov/ratereview">ratereview.healthcare.gov</a> for such information)	8/1/25

<sup>7</sup> Before making QHP Application data changes, applicable issuers must request to make the change and receive approval from CMS and their state regulator. More information on Data Change Windows is available at <https://www.qhpcertification.cms.gov/QHP/certificationforms/Data-Change-Windows>

<sup>8</sup> Further information on the actions required by issuers and states in response to *City of Columbus v. Kennedy* is available in the Qualified Health Plan (QHP) Certification Updates for the Federally-facilitated Exchange (FFE) and State-based Exchanges on the Federal Platform (SBEs-FP) in Response to *City of Columbus v. Kennedy*, No. 25-cv2114-BAH (D.Md.) memo, available at: <https://www.cms.gov/files/document/qhp-certification-updates.pdf>

<sup>9</sup> 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.

<sup>10</sup> The information collection request related to rate filing justifications is approved under OMB control number 0938-1141.

<sup>11</sup> 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.

<sup>12</sup> 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 16, 2025). 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 16, 2025).

<sup>13</sup> 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).

Deadline for <b>Effective Rate Review states</b> with Exchanges served by the HealthCare.gov platform to finalize determinations for rate filing justifications <u>that include a QHP</u> . <sup>14</sup>	8/13/25
CMS finalizes determinations for rate filing justifications that include a QHP from issuers in states <b>without</b> an Effective Rate Review Program	8/13/25
<b>NEW:</b> Deadline for issuers in states without an Effective Rate Review Program to request CMS Rate Review deactivate QHP rate filings that require revisions. <sup>15</sup>	9/11/25
<b>NEW:</b> Deadline for issuers in states without an Effective Rate Review Program to submit revised QHP rate filings. <sup>16</sup>	9/16/25
<b>NEW:</b> CMS finalizes determinations for revised QHP rate filings from issuers in states without an Effective Rate Review Program	9/29/25
<b>NEW:</b> Deadline for FFE and SBE-FP Effective Rate Review states to finalize determinations for revised QHP rate filings in SERFF. <sup>17</sup>	9/29/25
<b>REVISED:</b> Deadline for <b>Effective Rate Review states</b> 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> . <sup>18</sup>	10/22/25
<b>REVISED:</b> Deadline for <b>Effective Rate Review states</b> to finalize rate filing justifications <u>that only contain non-QHPs</u> . <sup>19</sup>	10/22/25
<b>REVISED:</b> CMS finalizes determinations for rate filing justifications that only contain non-QHPs from issuers in states <b>without</b> an Effective Rate Review Program	10/22/25
Target date on which CMS will post <u>all</u> final rate changes. <sup>20</sup>	10/31/25
Deadline for Effective Rate Review States to post all final rate increases, including those not subject to review (or link to <a href="https://ratereview.healthcare.gov">ratereview.healthcare.gov</a> for such information). <sup>21</sup>	10/31/25

Table 3. Federal Form Review<sup>22</sup>

Activity	Dates
----------	-------

<sup>14</sup> 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.

<sup>15</sup> See supra note 9.

<sup>16</sup> Ibid.

<sup>17</sup> See supra note 15.

<sup>18</sup> Ibid.

<sup>19</sup> Ibid.

<sup>20</sup> 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).

<sup>21</sup> See 45 CFR 154.301(b)(1)(ii).

<sup>22</sup> The information collection request related to form filings is approved under OMB control number 0938-0702.

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 <sup>23, 24, 25</sup>	5/15/25
Deadline for QHP forms to be finalized	8/13/25
<b>NEW:</b> Deadline for issuers in states where CMS is directly enforcing the ACA provisions to request CMS Form Filing reopen any QHP form filings that require revisions <sup>26</sup>	9/11/25
<b>NEW:</b> Deadline for issuers in states where CMS is directly enforcing the ACA provisions to submit revised QHP form filings <sup>27</sup>	9/16/25
<b>NEW:</b> Deadline for revised QHP forms to be finalized	9/29/25
<b>REVISED:</b> Deadline for QHP URLs to be live and active	10/2/25
<b>REVISED:</b> Deadline for non-QHPs forms to be finalized	10/22/25
Deadline for non-QHPs URLs to be live and active	11/1/25

Table 4. Risk Adjustment for Benefit Year 2024  
and Risk Adjustment Data Validation for Benefit Years 2023 and 2024.<sup>28</sup>

Activity	Dates
Interim 2024 Benefit Year Risk Adjustment Report Released	March 2025
Deadline for Submission of Final 2024 Benefit Year Risk Adjustment Data	4/30/25
2024 Benefit Year Risk Adjustment Data Validation Samples Released	May 2025
2023 Benefit Year Risk Adjustment Data Validation Error Rates Released	June 2025
Summary Report of 2024 Benefit Year Risk Adjustment Transfers Released	6/30/25
Summary Report of 2023 Benefit Year Risk Adjustment Data Validation Adjustments to Risk Adjustment Transfers Released	July 2025
Collection of 2024 Benefit Year Risk Adjustment Charges Begins	August 2025
Collection and Payment of 2023 Benefit Year Risk Adjustment Data Validation Adjustments to Transfers and Default Data Validation Charges Begins	September 2025
2024 Benefit Year Risk Adjustment Payments Begin	September 2025

Table 5. Consolidated CY2025 Key Dates in Chronological Order

<sup>23</sup> 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/>.

<sup>24</sup> In addition to reviewing form filings for CAA compliance, CMS will also review form filings in Missouri, Oklahoma, Tennessee, Texas, and Wyoming for compliance with applicable ACA federal market reforms. Issuers in those five 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.

<sup>25</sup> 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.

<sup>26</sup> See supra note 9.

<sup>27</sup> Ibid.

<sup>28</sup> The information collection request related to risk adjustment data is approved under OMB control number 0938-1155.

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 2024 Benefit Year Risk Adjustment Report Released	March 2025
QHP Certification	QHP Application submission and data validation window opens	4/16/25
Risk Adjustment	Deadline for Submission of Final 2024 Benefit Year Risk Adjustment Data	4/30/25
Risk Adjustment	2024 Benefit Year Risk Adjustment Data Validation Samples Released	May 2025
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	5/15/25
QHP Certification	HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS on behalf of the issuer	5/16/25
Risk Adjustment	2023 Benefit Year Risk Adjustment Data Validation Error Rates Released	June 2025
Rate Review	Deadline for issuers in states <b>without</b> an Effective Rate Review Program to submit proposed rate filing justifications to CMS in the Unified Rate Review (URR) module of HIOS	6/2/25
QHP Certification	CMS reviews QHP Application data as they are submitted and releases results for issuers and states to review	4/16/25 – 6/6/25
QHP Certification	Initial Application Deadline: Initial deadline for issuers to submit QHP Applications to CMS, including Plan ID Crosswalk data	6/11/25
QHP Certification	QHP issuers submit the validated QRS clinical measure data, with attestation, to CMS via NCQA's Interactive Data Submission System (IDSS)	6/13/25
Risk Adjustment	Summary Report of 2024 Benefit Year Risk Adjustment Transfers Released	6/30/25
Risk Adjustment	Summary Report of 2023 Benefit Year Risk Adjustment Data Validation Adjustments to Risk Adjustment Transfers Released	July 2025
QHP Certification	CMS reviews initial QHP Applications and releases results for issuers and states to review	6/12/25 – 7/11/25
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	7/16/25
Rate Review	Deadline for issuers in states <b>with</b> an Effective Rate Review Program to submit proposed rate filing justifications to CMS and the state	7/16/25
Risk Adjustment	Collection of 2024 Benefit Year Risk Adjustment Charges Begins	August 2025
Rate Review	Date on which CMS posts proposed rate changes	8/1/25

Rate Review	Deadline for states <b>with</b> an Effective Rate Review Program to post proposed rate increases subject to review (or link to <a href="https://ratereview.healthcare.gov">ratereview.healthcare.gov</a> for such information)	8/1/25
QHP Certification	CMS reviews Rates Table Template data and resubmitted QHP Application data, and releases results for issuers and states to review	7/17/25 – 8/8/25
QHP Certification	Final Application Deadline: Deadline for issuers to submit changes to their QHP Applications	8/13/25
Rate Review	Deadline for <b>Effective Rate Review states</b> with Exchanges served by the HealthCare.gov platform to finalize determinations for rate filing justifications <u>that include a QHP</u>	8/13/25
Rate Review	CMS finalizes determinations for rate filing justifications that include a QHP from issuers in states <b>without</b> an Effective Rate Review Program	8/13/25
Form Review	Deadline for QHP forms to be finalized	8/13/25
QHP Certification	Issuer Plan Confirmation/Crosswalk Deadline: Issuers complete final plan confirmation and submit final Plan ID Crosswalk Templates	8/6/25 – 8/20/25
QHP Certification	Issuers, Exchange administrators, and CMS preview the 2025 QHP quality rating information	Aug./Sep. 2025
Risk Adjustment	Collection and Payment of 2023 Benefit Year Risk Adjustment Data Validation Adjustments to Transfers and Default Data Validation Charges Begins	September 2025
Risk Adjustment	2024 Benefit Year Risk Adjustment Payments Begin	September 2025
QHP Certification	CMS reviews QHP Applications and releases results for issuers and states to review	8/14/25 – 9/8/25
QHP Certification	Limited data change window	9/11/25 -9/12/25
Rate Review	<b>NEW:</b> Deadline for issuers in states without an Effective Rate Review Program to request CMS Rate Review deactivate QHP rate filings that require revisions	9/11/25
Form Review	<b>NEW:</b> Deadline for issuers in states where CMS is directly enforcing the ACA provisions to request CMS Form Filing reopen any QHP form filings that require revisions	9/11/25
Rate Review	<b>NEW:</b> Deadline for issuers in states without an Effective Rate Review Program to submit revised QHP rate filings	9/16/25
Form Review	<b>NEW:</b> Deadline for issuers in states where CMS is directly enforcing the ACA provisions to submit revised QHP form filings	9/16/25
QHP Certification	<b>NEW:</b> Additional opportunity for issuers to withdraw plans	9/16/25 – 9/25/25
QHP Certification	<b>REVISED:</b> CMS sends QHP Certification Agreements to issuers	9/26/25

Rate Review	<b>NEW:</b> CMS finalizes determinations for revised QHP rate filings from issuers in states without an Effective Rate Review Program	9/29/25
Rate Review	<b>NEW:</b> Deadline for FFE and SBE-FP Effective Rate Review states to finalize determinations for revised QHP rate filings in SERFF	9/29/25
Form Review	<b>NEW:</b> Deadline for revised QHP forms to be finalized	9/29/25
QHP Certification	<b>REVISED: QHP Agreement Signing Deadline:</b> Issuers return signed QHP Certification Agreements to CMS	9/26/25 -10/2/25
QHP Certification	<b>REVISED: State Plan Confirmation Deadline:</b> States complete final plan confirmation	9/26/25 – 10/2/25
QHP Certification	<b>NEW:</b> Limited data change window	9/30/25 – 10/1/25
QHP Certification	<b>REVISED: Machine-Readable/URL Deadline:</b> Deadline for issuers' machine-readable data to be posted and marketing URLs to be live and active	10/2/25
Form Review	<b>REVISED:</b> Deadline for QHP URLs to be live and active	10/2/25
QHP Certification	<b>REVISED:</b> CMS releases certification notices to issuers and states	10/17/25
Rate Review	<b>REVISED:</b> Deadline for <b>Effective Rate Review states</b> 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>	10/22/25
Rate Review	<b>REVISED:</b> Deadline for <b>Effective Rate Review states</b> to finalize rate filing justifications <u>that only contain non-QHPs</u>	10/22/25
Rate Review	<b>REVISED:</b> CMS finalizes determinations for rate filing justifications that only contain non-QHPs from issuers in states <b>without</b> an Effective Rate Review Program	10/22/25
Form Review	<b>REVISED:</b> Deadline for non-QHPs forms to be finalized	10/22/25
Rate Review	Target date on which CMS will post <u>all</u> final rate changes	10/31/25
Rate Review	Deadline for Effective Rate Review States to post all final rate increases, including those not subject to review (or link to <a href="https://ratereview.healthcare.gov">ratereview.healthcare.gov</a> for such information)	10/31/25
Form Review	Deadline for non-QHPs URLs to be live and active	11/1/25
QHP Certification	Anticipated public display of QHP quality rating information	11/1/25
QHP Certification	Open Enrollment begins	11/1/25