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**Date:** August 4, 2026

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**Title:** Plan Year (PY) 2027 Qualified Health Plan (QHP) Data Submission and Certification Timeline

**Subject:** Bulletin: Revised Timing of QHP Data Submission and Certification for the 2027 Plan Year for Issuers in the Federally-facilitated Exchanges

## **I. Purpose**

The Centers for Medicare & Medicaid Services (CMS) is releasing this bulletin establishing the submission deadlines under 45 CFR 155 subpart K for health insurance issuers applying to offer qualified health plans (QHPs) on the Federally-facilitated Exchanges (FFE)s.<sup>1</sup>

The Patient Protection and Affordable Care Act (ACA) and applicable regulations provide that health plans, including stand-alone dental plans (SADPs), must meet a number of standards in order to be certified as QHPs. Several of these are market-wide standards that apply to plans offered in the individual and small group markets, both inside and outside of the Exchanges. The remaining standards are specific to health plans seeking QHP certification from the Exchanges. The dates in this bulletin apply to all states in which an FFE operates, which include: 1) states performing plan management functions and making QHP certification recommendations to CMS, 2) states where CMS is performing all plan management functions and certifying QHPs while the state is enforcing the market-wide standards under the ACA, and 3) states where CMS is performing plan management functions and enforcing market-wide standards under the ACA (but the state continues to enforce state law requirements with which issuers must comply). Some of the dates included in this bulletin would also apply to issuers in State-based Exchanges on the Federal Platform (SBE-FPs); additional information on these requirements will be provided in future guidance. Issuers should refer to these dates to help them successfully participate in any such Exchange in 2027.

## **II. Revised PY2027 QHP Data Submission and Certification Timeline**

Table 1 lists key PY2027 dates for QHP certification applications and related data submissions. Additional information about the PY2027 QHP certification process will be provided in future guidance.

As in prior years, issuers will submit a complete QHP application for all plans they intend to have certified in a state in which an FFE is operating. Through an iterative process as shown in Table 1, CMS will review QHP applications for current and new issuers applying for QHP certification in an FFE.

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<sup>1</sup> The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law. 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.

Issuers may have their QHP application denied if they fail to meet the applicable deadlines, or if their applications are not accurate or complete after the deadline for issuer submission of changes to the QHP application.<sup>2</sup>

*Table 1. QHP Data Submission and Certification Timeline for Plan Year 2027*

| <b>Activity</b>                                                                                                                                                                                                                                                                  | <b>Dates</b>      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| QHP Application data validation window opens                                                                                                                                                                                                                                     | 4/15/26           |
| QHP Application submission window opens                                                                                                                                                                                                                                          | 5/20/26           |
| CMS reviews QHP Application data as they are submitted and releases results for issuers and states to review                                                                                                                                                                     | 5/20/26 – 6/5/26  |
| HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS on behalf of the QHP issuer <sup>3</sup>                                                                                                                                   | 5/8/26 – 5/15/26  |
| <b>Initial Application Deadline:</b> Initial deadline for issuers to submit QHP Applications to CMS, including Plan ID Crosswalk data                                                                                                                                            | 6/10/26           |
| CMS reviews initial QHP Applications and releases results for issuers and states to review                                                                                                                                                                                       | 6/11/26 – 7/10/26 |
| QHP issuer submits the validated Quality Rating System (QRS) clinical measure data, with attestation, to CMS via the National Committee for Quality Assurance's (NCQA) Interactive Data Submission System (IDSS) <sup>4</sup>                                                    | 6/15/26           |
| <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                                                                          | 7/15/26           |
| CMS reviews Rates Table Template data and resubmitted QHP Application data, and releases results for issuers and states to review                                                                                                                                                | 7/16/26 – 8/7/26  |
| Issuers, State and Federally-facilitated Exchange administrators, and CMS preview the 2026 QHP quality rating information                                                                                                                                                        | Aug./Sept. 2026   |
| <b>REVISED:</b> Final cutoff for states to email CMS about compliance efforts regarding standardized plan options and non-standardized plan options limits and exceptions, or for states to inform CMS of significant concerns regarding implementation feasibility <sup>5</sup> | 8/14/26           |
| <b>REVISED: Issuer Plan Confirmation/Crosswalk Deadline:</b> Issuers complete final plan confirmation and submit final Plan ID Crosswalk Templates                                                                                                                               | 8/12/26 – 8/31/26 |
| <b>REVISED: Final Application Deadline:</b> Deadline for issuers to submit changes to their QHP Applications                                                                                                                                                                     | 8/20/26           |
| <b>REVISED:</b> CMS reviews QHP Applications and releases results for issuers and states to review                                                                                                                                                                               | 8/21/26 – 9/15/26 |
| <b>REVISED:</b> CMS finalizes determinations for rate filing justifications <u>that include a QHP</u> from issuers in states <b>without</b> an Effective Rate Review Program                                                                                                     | 8/28/26           |
| <b>REVISED:</b> 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>6</sup>                                                           | 8/28/26           |

<sup>2</sup> Regulations at 45 CFR 155.1000 provide Exchanges with broad discretion to certify QHPs that otherwise meet the QHP certification standards specified in Subpart C of Part 156, and afford Exchanges the discretion to deny certification of QHPs that meet minimum QHP certification standards, but are not ultimately in the “interest” of qualified individuals and qualified employers.

<sup>3</sup> QRS and QHP Enrollee Survey Technical Guidance for 2026, available at <https://www.cms.gov/files/document/qrs-and-qhp-enrollee-experience-survey-technical-guidance-2026.pdf>.

<sup>4</sup> Each QHP issuer must submit and plan-lock its QRS clinical measure data by May 29 to allow the HEDIS® Compliance Auditor sufficient time to review, approve, and audit-lock all submissions by the June 15 deadline. There are no fees for QHP issuers associated with accessing and using the IDSS.

<sup>5</sup> States that will not be able to meet the deadlines established in this guidance due to limited time or resources must inform CMS by this date.

<sup>6</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 submissions page of MPMS. States with an Effective Rate

| Activity                                                                                                                                         | Dates             |
|--------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| <b>REVISED:</b> CMS sends QHP Certification Agreements to issuers                                                                                | 9/15/26           |
| <b>REVISED: QHP Agreement Signing Deadline:</b> Issuers return signed QHP Certification Agreements to CMS                                        | 9/15/26 – 9/23/26 |
| <b>REVISED: State Plan Confirmation Deadline:</b> States complete final plan confirmation                                                        | 9/15/26 – 9/23/26 |
| <b>REVISED:</b> Limited data correction window <sup>7</sup>                                                                                      | 9/18/26 – 9/21/26 |
| <b>REVISED: Machine-Readable/URL Deadline:</b> Deadline for issuers' machine-readable data to be posted and marketing URLs to be live and active | 9/23/26           |
| <b>REVISED:</b> CMS releases certification notices to issuers and states                                                                         | 10/6/26 – 10/7/26 |
| Anticipated public display of QHP quality rating information                                                                                     | 11/1/26           |
| Open Enrollment begins                                                                                                                           | 11/1/26           |

### III. CMS Qualified Health Plan Application

Information and instructions about the process for issuers to complete a QHP application are made available annually at <https://www.qhpcertification.cms.gov>.

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Review Program that do not participate in SERFF must enter the applicable final determination directly in the URR Submissions page of Marketplace Plan Management System (MPMS) Module. 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>7</sup> Issuers who finalize their rates after the final submission deadline of August 20, 2026, must submit a Data Change Request (DCR) to make changes to the Rates Table Template (and if applicable, the Plans & Benefits Template) for CMS review by September 4, 2026. Instructions and forms for submitting a DCR are at:

<https://www.qhpcertification.cms.gov/QHP/certificationforms/Data-Change-Windows>