



Illinois Department of Insurance

JB PRITZKER
Governor

ANN GILLESPIE
Acting Director

TO: All Companies Writing Accident and Health Ins and Managed Care Plans in Illinois

FROM: Ann Gillespie, Acting Director *ARG*

DATE: May 30, 2025

RE: Company Bulletin 2025-09

The Department of Insurance (Department) intends this bulletin to serve as an addendum to Company Bulletin 2025-07.

The Department recognizes that for Plan Year 2026 (PY26) filings there are items that have not yet been formally finalized, including the proposed Rule that would amend the previously announced Individual and Family MOOP amounts that may require adjustments once finalized. In lieu of delaying the posting of Illinois' annual filing guidance until finalization, the Department publishes this guidance understanding that plans and issuers may need to adjust filing submissions accordingly once finalized.

The Department is also aware that certain plan designs (i.e., catastrophic plans) may encounter template validation errors as a result of this uncertainty. In these events, plans and issuers are encouraged to prepare the corresponding templates to satisfy the current template validation rules and will work with issuers as needed once Rules have been finalized.

Regarding impact of rates with consideration to "state mandates," if any state mandate(s) have an impact on pricing, please describe the impact in the Actuarial Memorandum.

Regarding exchange user fees, carriers should assume that Illinois' application to be a State-based Marketplace is approved and should assume an exchange user fee of 2.75%.

Per instructions released by the Centers for Medicaid and Medicare Services (CMS) on May 2, 2025, please specify the actual CSRs the issuer paid in PY 2024 in the Actuarial Memorandum submitted for PY 2026. Please also explain how the additional revenue collected from the applied CSR load compares to the expected amount of CSRs that will be provided to enrollees in PY 2026. CMS subsequently released guidance indicating that estimates are allowed. If the information is not included in the initial rate filing, our consulting actuaries will request that it be added in one of the early rounds of objections.

Questions regarding this Company Bulletin may be emailed to DOI.InfoDesk@Illinois.gov.