



Illinois Department of Insurance

JB PRITZKER
Governor

ANN GILLESPIE
Acting Director

TO: Health Insurance Issuers with Plan Year 2025 Small Group ACA Business in Illinois

FROM: Ann Gillespie, Acting Director

DATE: February 28, 2025

RE: COMPANY BULLETIN 2025-03 - Plan Year 2025 Small Group Quarterly Rate Filings

This is a supplement to [Company Bulletin 2024-11](#) to provide guidance on deadlines for submission of small group ACA quarterly rate filings with Q3 or Q4 effective dates during the 2025 plan year.

Under Section 355(d) of the Illinois Insurance Code [215 ILCS 5/355(d)], for non-grandfathered coverage in the individual and small group markets, the Department is statutorily required to publish all “rate filings and summaries” within 5 business days after the rate filing submission deadline, except for information that is protected as proprietary or trade secret under Section 7(1)(g) of the Freedom of Information Act (“FOIA”) [5 ILCS 140/7(1)(g)].

For Plan Year 2025, issuers must file non-grandfathered small group rate changes by **March 18, 2025** for July 1, 2025 effective dates and **June 18, 2025** for October 1, 2025 effective dates. The Department then will publish the non-proprietary/non-trade secret portions of the rate filings on March 25, 2025 and June 25, 2025, respectively, which will trigger 30-day public comment periods under Section 355(e) of the Illinois Insurance Code [215 ILCS 5/355(e)].

Any rate filing information that an issuer submits without taking necessary steps to protect in the manner prescribed by Section 7(1)(g) of FOIA will be published on the Department’s website. Please carefully review Section 7(1)(g) of FOIA for information about all generally required elements for any letter that asserts a trade secret confidentiality claim to a public body, including any such letter to the Department sent from or on behalf of a health insurance issuer. Please consult [50 Ill. Adm. Code 2026.50\(c\)](#) for additional compliance requirements for confidentiality of these rate filings.

In lieu of the version at CB 2024-11 – Addendum A, please use the version of the Public Rate Filing Summary attached to this supplemental company bulletin, which has been updated to identify the public comment periods described above.

For questions regarding this Company Bulletin, please direct inquiries to DOI.InfoDesk@Illinois.gov.