State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Insurance Department

JONATHAN T. PIKE
Insurance Commissioner

BULLETIN 2025-7

To:	Insurers Offering a Health Benefit Plan in the Individual Market
From:	Jonathan T. Pike, Insurance Commissioner
Date:	May 19, 2025
Subject:	**Cost Share Reduction Reporting Guidance for PY2026 Health Benefit Plans**

The Utah Insurance Department ("the Department") issues this Bulletin to provide additional guidance for health benefit plans in the individual market for the 2026 plan year. This follows the recent guidance in the bulletin issued by the Centers for Medicare & Medicaid Services (CMS), available at:
https://www.cms.gov/files/document/py-26-individual-market-rate-filing-instructions.pdf.

The CMS bulletin requires that all issuers applying permitted plan-level adjustments (commonly referred to as "CSR loading") to reflect the cost of Cost-Sharing Reductions (CSRs) provided to eligible enrollees without federal reimbursement, must include the following in their Plan Year (PY) 2026 rate filing:

- The actual CSR amounts paid for enrollees during PY 2024; and
- The specific load amount included in the premiums and a clear explanation of the methodology used to determine it, as documented in the Actuarial Memorandum.

The Department recognizes that calculating the exact CSR payments for PY 2024 may present a significant administrative burden under the current timeline. Therefore, insurers may submit a reasonable estimate, provided that the filing includes a detailed explanation of the estimation methodology.

Additionally, CMS has requested that insurers explain in their Actuarial Memorandum how the additional revenue generated from the CSR load compares to the expected CSR costs for enrollees in PY 2026.

Furthermore, in light of the possibility that Congress may resume federal funding for CSRs in PY 2026, the Department requires each insurer to include in its Actuarial Memorandum a single adjustment factor that reflects the change in rates that would occur if such funding is enacted. This factor should be documented similarly to the contingency factor used for the potential extension of the enhanced premium tax credit, as outlined in Bulletin 2025-6. All assumptions and methodologies used to calculate this factor must be clearly described in the Actuarial Memorandum.

If you have any questions or comments, please contact Ryan Jubber at (801) 957-9294 or rjubber@utah.gov.

DATED this 19th day of May 2025.

____
Jonathan T. Pike
Insurance Commissioner