



COMMISSIONER OF SECURITIES AND INSURANCE

James Brown
Commissioner

Office of the
Montana State Auditor

ADVISORY MEMORANDUM

To: All interested parties

From: James Brown *JB* 6/4/26
Commissioner of Securities and Insurance, Montana State Auditor

Date: June 04, 2026

Ref: **Second Updated Requirements for Qualified Health Plan (QHP) Certification related to the 2027 Final Notice of Benefit and Payment Parameters**

On May 26, 2026, the Office of the Montana State Auditor, Commissioner of Securities and Insurance (CSI), issued an Updated Advisory Memorandum that provided instructions for filing both on-exchange and off-exchange health plans. The Updated Advisory Memorandum clarified the CSI April 22, 2026 Advisory Memorandum and explained updates that the Centers for Medicare & Medicaid Services (CMS) issued in its May 15, 2026, CMS 2027 Final Notice of Benefit and Payment Parameters (2027 Final Rule), which will take effect July 20, 2026.

Because of the compressed timeline between the 2027 Final Rule and the Filing Requirements for Montana, CSI has elected to extend the initial Rate Filing Due Date.

Filing Requirements for Montana	Due Date
Binder, Form, & Network Info Due	May 20, 2026
Rate Filings Due	May 20-June 12, 2026*
Initial QHP Applications Transfer to CMS	June 10, 2026
Initial Transfer of Rate Data Templates to CMS	July 15, 2026**
Final day for Issuers to make changes to Binder, Form, and Rates	July 29, 2026
CMS Binder Final Deadline	August 12, 2026

*Extended seven (7) days from the original timeline.

**Updated to align with federal submission timelines.

Clarification on Rate Submissions

CSI has revised the timeline for submission of rate filings for the 2027 plan year. The deadline for

rate filings has been extended to Friday, June 12, 2026.

By this date, issuers must submit in the binder the Rate Data Templates (RDTs) populated with the actual rates the issuer intends to offer for the applicable products. The RDTs must align with the associated rate filing as of the June 12 deadline.

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This advisory memorandum is informational only and does not enlarge, limit, or modify any requirements of applicable law or in any way limit the authority of CSI under applicable law. CSI encourages interested persons to consult with independent legal counsel for guidance on the topics addressed in this Addendum and the Advisory Memorandum.