

The Individual Health Insurance Market 2026

An Illustrative Premium Rate Development Timeline

Open enrollment for 2026 individual health insurance market coverage will begin on Nov. 1, 2025. However, developing plan designs and premiums is a process that spans more than a year, with actuaries and insurers starting premium rate development for plan year 2026 as early as fall 2024. The timeline varies based on each insurer's internal business practices, as well as federal and state rate filing requirements. The table below outlines the typical timing of key steps in the rate-setting process.

Approximate Internal Insurer Deadlines (assumes early June submission deadline)	
Product development and experience analysis	Sept. 2024–Feb./March 2025
Plan design development and actuarial value (AV) testing	Nov. 2024–April 2025
Examine prior experience and make necessary adjustments	March 2025
Set target provider reimbursement levels	Early-mid April 2025
Project data based on expected medical and Rx trend	Mid-late April 2025
Obtain internal approvals, finalize rates, prepare filing materials	May 2025
External Deadlines	
Initial rate filing submission deadlines*	May-July 2025 (varies by state)
Final federal marketplace application deadline*	Aug. 13, 2025
Final limited data correction window*	Sept. 12-13, 2025
Rate filing data published	Oct. 15, 2025
Open enrollment begins	Nov. 1, 2025
Plan year begins	Jan. 1, 2026

* State-based exchanges have some flexibility to set their own deadlines, and some follow the federal deadlines.

The premium development process must account for any updates to federal or state rules, such as those related to the benefit and payment parameters or the AV calculator. Timely finalization of these rules helps insurers meet internal timelines and external filing deadlines. Likewise, legislative changes made earlier in the process are more readily reflected in premium rates. Depending on the nature of the change, updating rates to fully reflect new policies—particularly those affecting enrollment, the risk pool, premium tax credits, or other major factors—can take six weeks or more.

This timeline was developed by the Individual and Small Group Markets Committee of the American Academy of Actuaries.

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