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BULLETIN 25-6

Date: April 22, 2025

To: Insurers, Nonprofit Health Service Plans, Health Maintenance Organizations and Dental Plan Organizations (Carriers)

Re: 2025 Network Access Plan Filing Instructions

The purpose of this bulletin is to notify insurance carriers and those entities that use provider panels for health benefit plans and dental plans of the filing deadlines and changes to the filing process for the filing of the annual access plans for 2025.

Health Benefit Plan Filings

Code of Maryland Regulations (“COMAR”) 31.10.44.04 requires that “each carrier subject to this chapter shall file an annual access plan with the Commissioner on or before July 1 of each year for each provider panel used by the carrier.” COMAR 31.10.44.04I provides that the Commissioner may issue a bulletin designating a later filing deadline than July 1 for the information described in §§C(3), (4), and (12) of Regulation .04.

For 2025, pursuant to COMAR 31.10.44.04, the MIA is directing carriers to submit the annual access plan filings for health benefit plans through SERFF in accordance with the Annual Filing Instructions posted on the [Network Adequacy Regulations Information](#) page of the MIA website. With the exception of the information described in COMAR 31.10.44.04C(3), (4), and (12), the filings must be submitted by July 1, 2025. The additional information required by COMAR 31.10.44.04C(3), (4), and (12) must be submitted, in the same SERFF filing as the annual access plan, by October 1, 2025.

The Annual Filing Instructions on the MIA website provide detailed guidance on filing content and format, and should be reviewed in full prior to preparing and submitting a filing. A separate SERFF filing must be submitted for each distinct provider panel or network when the same carrier uses multiple networks for health benefit plans in Maryland. Carriers are expected to

annotate all confidential information within the report, and, as necessary, utilize the available functionality in SERFF to request confidentiality for specific parts of the filing.

The MIA has also updated the filing template forms available in SERFF. These template forms are designed to collect from all carriers in a uniform manner the specific data and information needed by the MIA to complete its reviews of the annual access plans. Carriers are required to use all applicable template forms for the 2025 access plan filings. The MIA continues to solicit feedback from carriers on how to improve the efficiency and utility of the templates. Suggestions for improvement should be emailed to networkadequacy.mia@maryland.gov.

Dental Plan Filings

Carriers that issue or renew dental plans in Maryland and use a provider panel for a dental plan offered in Maryland should file the executive summary form described in COMAR 31.10.45.06 by December 1, 2025 through SERFF. Filing template forms for the executive summary and waiver requests, if applicable, are available in SERFF. As a reminder, the executive summary form does not contain confidential information.

The Annual Filing Instructions posted on the [Network Adequacy Regulations Information](#) page of the MIA website provide specific guidance for submitting access plan filings through SERFF. A separate SERFF filing must be submitted for each distinct provider panel or network when the same carrier uses multiple networks for dental plans in Maryland.

Questions about this Bulletin may be directed to the Life & Health Unit of the Maryland Insurance Administration at 410-468-2170 or by email to networkadequacy.mia@maryland.gov.

MARIE GRANT
Commissioner

By:

signature on original

David Cooney
Associate Commissioner