

# Silver State Health Insurance Exchange

Monthly Meeting of Nevada's On-Exchange Insurance Carriers

March 11, 2025



## **Introductions - SSHIX**

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# **Agenda**



- Six Month Look-Ahead
- Open Enrollment Metrics Summary
- Statewide Application & Enrollment Report Pt. 1-4
- Plan Certification Update
- Policy Update
- March RCNI Submission
- ICHRA & QSEHRA Enhancements
- Q&A

# Six Month Look-Ahead

### March, 2025

Special Enrollment Period

## **April**, 2025

- Intent to Sell & EDI Test Forms are due 4/1/25 from Issuers
- New Carrier Onboarding begins (schedule TBD)

### May, 2025

- 5/16: CMS QHP Enrollee Survey data submission deadline
- 5/21: HHS-approved QHP Enrollee Survey vendor securely submits the survey response data to CMS on behalf of the QHP issuer

### June, 2025

- 6/2: Binders and Form & Rate submissions are due in SERFF
- 6/2 7/11: SSHIX initial review of binder data submitted in SERFF
- 6/13: QHP issuer submits validated QRS clinical measure data, with attestation, to CMS via NCQA's Interactive Data Submission System (IDSS)
- 6/17: Initial Objection Letter to be sent out

# Six Month Look-Ahead (cont'd)

### July, 2025

- 7/14: First data transfer from SERFF to the Nevada Health Link SBE Platform
- 7/14-8/22: Issuer Plan Preview begins on Nevada Health Link SBE Platform

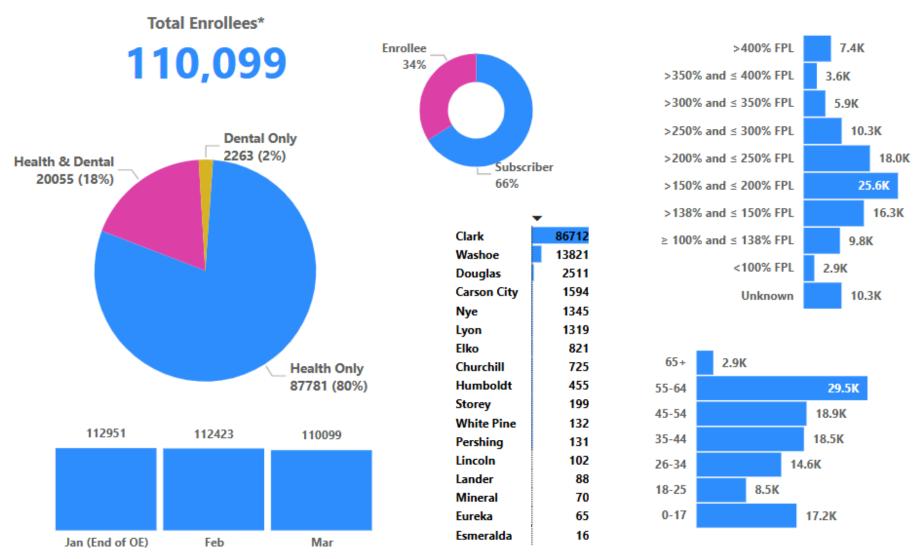
#### **August, 2025**

- 8/1 9/30: QHP Quality Rating preview
- 8/1: Proposed rate change posted on DOI website
- 8/15: Draft Plan Year 25 Issuer Agreements sent to issuers for review
- 8/22: Plan Preview ends, deadline for all plans to be verified; Letters of Good Standing submitted to the Exchange from DOI
- 8/22: Final deadline for issuers to change QHP application w/o state authorization
- 8/29: Rate filings approved by DOI; Final data transfer from SERFF to NVHL SBE Platform
- 8/29: Plans reverified for rates rates must be approved by DOI

## **March 2025 Enrollment Summary**

#### **All Enrollees – All Counties**



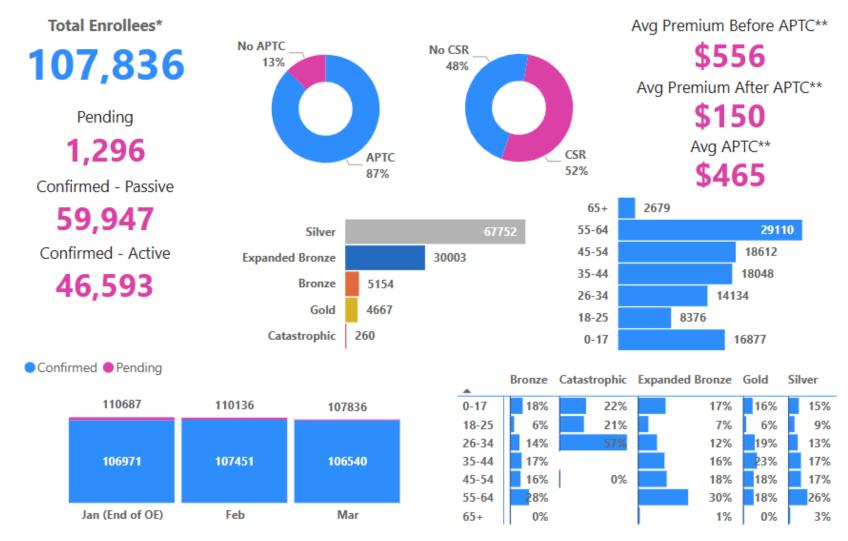


<sup>\*</sup>Includes unique enrollees with a 2024 plan selection in Confirmed or Pending status as of 3/3/25. Consumers with Terminated or Cancelled policies have been removed from these counts.

## **March 2025 Enrollment Summary**

#### **Health Enrollees – All Counties**





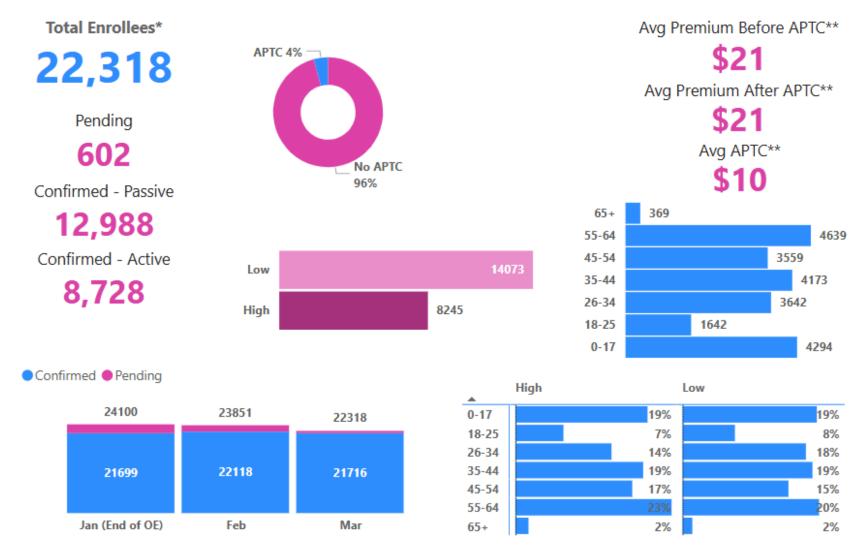
<sup>\*</sup>Includes unique enrollees with a 2024 plan selection in Confirmed or Pending status as of 3/3/25. Consumers with Terminated or Cancelled policies have been removed from these counts;

<sup>\*\*</sup>Average Premium values are monthly averages for all enrollees; Average APTC is the monthly average for enrollees with monthly APTC > \$0.

## **March 2025 Enrollment Summary**

#### **Dental Enrollees – All Counties**





<sup>\*</sup>Includes unique enrollees with a 2024 plan selection in Confirmed or Pending status as of 3/3/25. Consumers with Terminated or Cancelled policies have been removed from these counts;

<sup>.</sup> \*\*Average Premium values are monthly averages for all enrollees; Average APTC is the monthly average for enrollees with monthly APTC > \$0.

- The Exchange is currently finalizing a report of Statewide Application and Enrollment data for Plan Year 2025, which we intend to release by Friday, March 21.
- The report will be posted to the Nevada Health Link website, on a new page intended to host similar reports going forward. An email with a download link will be distributed to the attendees of this meeting series once the report is available.
- Among the data points included in the report will be an identifier of the health or dental issuer associated with each enrollment, per Section 10.5 of the Plan Year 2025 Issuer Agreement: "Beginning with Plan Year 2025, SSHIX will release application and enrollment data which identifies the issuer associated with each enrollment."
- A separate data dictionary which defines the meaning and business use of each column will accompany the report.

- The report, which has been requested by numerous issuers over the last two years, is intended to facilitate improved market research and actuarial analysis. It's also intended to proactively address the increasing number of public records requests received by the Exchange during the same time period.
- The Exchange intends to release three such reports for each Plan Year going forward, which will align with the three annual data submissions required by CMS.
- The first will be an "End of OEP" report based on the state of Nevada Health Link enrollments at the conclusion of each year's Open Enrollment Period.
- The second will be a "Mid Year" report based on enrollment data as of June 30 of each year.
- The third will be an "End of Year" report based on the state enrollment data following the conclusion of each Plan Year.

Among the data points included in the individual, member-level report will be:

- Household ID, Application ID, individual Applicant ID (maps to Enrollee/Member ID), Creation Date, and Submission Date for all applications submitted to Nevada Health Link
- Enrollment ID, Enrollment Status, Enrollment Effective/End dates, Enrollee (Member) ID, Enrollee Span Status, Enrollee Span Coverage Begin/End Dates, Enrollee Age on Policy Benefit Effective Date, Gender, and Tobacco Usage for each member of each enrollment submitted to Nevada Health Link
- Metal level, CMS Plan ID, HIOS Issuer ID, Issuer Name, Insurance Type (Health or Dental), Auto-Renewal Indicator, Broker/Navigator Designation, Gross Premium, Group Max and Applied APTC, and Household Income FPL Bucket for each enrollment submitted to Nevada Health Link

After you've had a chance to review the report, feedback and suggestions are most welcome!

We want this report to be useful to your organizations, and we planned for the continued development of this report to be a collaborative and iterative process.

## **Plan Certification**

- Friendly reminder that the Intent to Sell Form and the Intent to EDI Test Form are due April 1, 2025.
  - (Note, the Intent to EDI test forms are only required for new carriers who did not offer plans in PY2025)
  - (A minor edit has been made to the Intent to Sell Form. There is now a separate tab for Battle Born State Plans.)
  - More information regarding the Battle Born State Plans is forthcoming from DHHS.
- NVHL is currently working on PY26 Guidance. With all the changes occurring at the federal level, guidance has been slow to be released.

# Plan Certification (cont'd)

### **Common Questions/Issues:**

- While we are in the early stages of planning for PY26, the Nevada Exchange
  is not considering, at this time, adopting standardized plans, including
  limiting non-standard plans. Discussions are occurring limiting non-standard
  plans in the near future based off of plan utilization, enrollment data and
  guidance in the NBPP.
- Network Providers: This has been a big topic. Please ensure for PY26 the URL template for Network providers is accurate and updated. There have been concerns with the validity of providers being listed that are no longer in network or in contract. If changes are made, directories NEED to be updated in a timely manner.
- Plan Marketing Names: 45 CFR 156.225(c) requires that qualified health plan and plan variation marketing names include correct information, without omission of material fact, and don't include content that is misleading.
- The information must accurately reflect the plan benefits on a plan variant level, including any limitations or cost variations based on provider network or drug formulary tiering, benefit category, or service type.



- CMS is still currently under a communications freeze. This could potentially lead to a delay in further communications including items pertaining to plan certification.
- CMS has released a 2025 Marketplace Integrity and Affordability Proposed Rule. SSHIX is currently evaluating the potential impacts to the Exchange. This proposed rule will be open for a 30-day comment period once it is officially posted to the Federal Register.

# Policy Updates (cont'd)

- Eligibility categories
  - Rescinds QHP eligibility for DACA recipients
  - Eliminates low-income SEP
- Enrollment policies
  - Reduces enrollment period to Nov. 1-Dec. 15.
  - Limits passive autorenewal by proposing a required \$5 premium in the case of renewing individuals who are eligible for \$0 plans who do not actively update their eligibility prior to enrollment
  - Eliminates option to renew CSR-eligible individuals into silver from bronze plans
- Verifications
  - Eliminates 60-day extension allowed for submission of income verification documentation
  - Eliminates option to accept attestation in the case of income and household size that IRS data cannot verify
  - Requires additional verification in the case of inconsistencies between households reporting income 100-400% FPL and IRS data indicating they are under 100% FPL

## **March RCNI Submission**

- The next RCNI Submission Deadline is **Thursday, March 20.**
- Carriers are expected to submit an RCNI for Plan Year 2024 and 2025.
- SSHIX has published a calendar of <u>2025 Monthly RCNI Submission Deadlines</u> to Nevada Health Link's <u>Carrier Resources Page</u>

Month	Submission Deadline	2026 RCNI	2025 RCNI	2024 RCNI
January 2025	Monday, January 20		X	X
February 2025	Thursday, February 20		Χ	Χ
March 2025	Thursday, March 20		X	X
April 2025	Monday, April 21		Χ	
May 2025	Monday, May 19		X	
June 2025	Thursday, June 19		Χ	
July 2025	Monday, July 21		Χ	
August 2025	Thursday, August 21		X	
September 2025	Thursday, September 18		X	
October 2025	Monday, October 20		Χ	
November 2025	Thursday, November 20	Χ	Χ	
December 2025	Thursday, December 18	Χ	Χ	Χ

# **ICHRA and QSEHRA Enhancements**

- The ICHRA/QSEHRA enhancements to 834 transactions (SEP Initial Enrollments or ADD transactions) which have been detailed in the last several monthly presentations were deployed last night, March 10, 2025, at approximately 8pm PDT.
- As a reminder, the ICHRA/QSEHRA flags leverage the existing "SEP REASON" element of the 2750 Loop, and no adverse impact on issuer EDI systems is anticipated.
- If your EDI system experiences trouble processing ADD transactions which contain an ICHRA/QSEHRA flag, please contact <u>reconsupport@exchange.nv.gov</u> with a description of the suspected issue.

## **Questions and Answers**

Please submit questions re: EDI/Reconciliation or Carrier Connector to the SSHIX Recon Team at:

reconsupport@exchange.nv.gov

Please submit questions re: Plan Certification to SSHIX Plan Certification Manager at:

pmanagement@exchange.nv.gov

Please submit Policy questions to Meagan W. Ranson at: <a href="mailto:mranson@exchange.nv.gov">mranson@exchange.nv.gov</a>