

Silver State Health Insurance Exchange

Monthly Meeting of Nevada's On-Exchange Insurance Carriers

August 12, 2025



Introductions - SSHIX

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Slide 2





- Six Month Look-Ahead
- Open Enrollment Metrics Summary
- ePTC Expiration Estimated Impact & Operational Impacts
- Plan Certification & Policy Update
- August RCNI Submission
- Q&A

Six Month Look-Ahead

August, 2025

- 8/1 9/30: QHP Issuers, Exchange Administrators, & CMS preview the 2025 QHP quality rating information
- 8/1: Proposed rate change posted on the DOI website
- 8/15: Draft Plan Year 26 Issuer Agreements sent to issuers for review (including attachments and Policy Memo)
- 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 (n/a to rates)
- 8/29: Rate filings approved by DOI; Final data transfer from SFRFF to NVHL SBF Platform
- 8/29: Plans reverified for rates rates must be approved by DOI

Six Month Look-Ahead (cont'd)

September, 2025

- 9/5/25: Final Plan Year 2026 Issuer Agreements sent to issuers with final plan confirmation list
- 9/5 9/12: Issuers send signed agreements and confirm final plan listings
- 9/15: SSHIX to send final plan confirmation list and countersigned issuer agreements to issuers
- 9/15: Plans Certified in SERFF

October, 2025

- 10/1: Approved rate changes posted on DOI website
- 10/1: Consumer window shopping begins on NevadaHealthLink.com
- 10/1: URL links need to be posted for window shopping to begin
- 10/6 10/10: Limited data correction window (n/a to utilize for service area changes, plan offerings, or rate data). Must obtain state authorization prior to us of window shopping

November, 2025

- 11/1: Anticipated public display of QHP quality rating information
- 11/1: Open Enrollment Begins

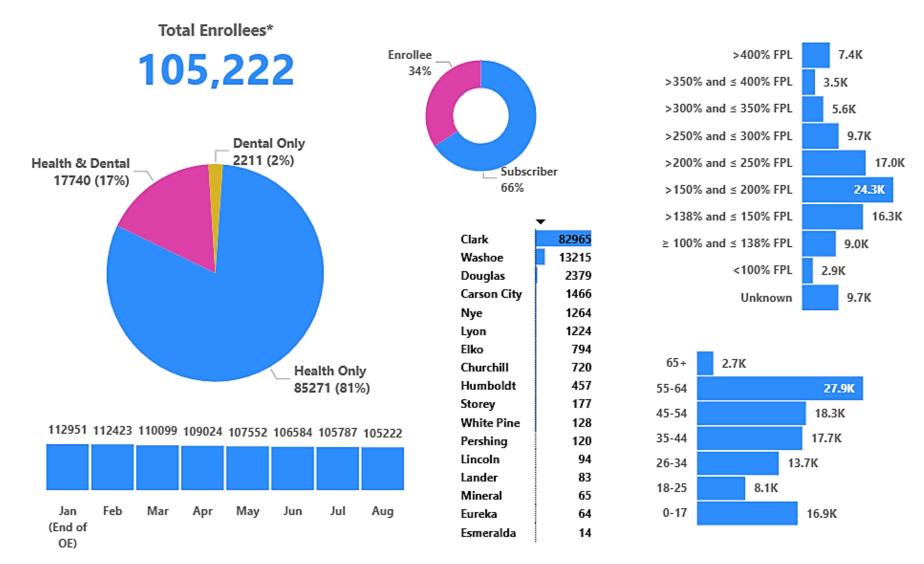
December, 2025

No updates - OEP

August 2025 Enrollment Summary

All Enrollees – All Counties



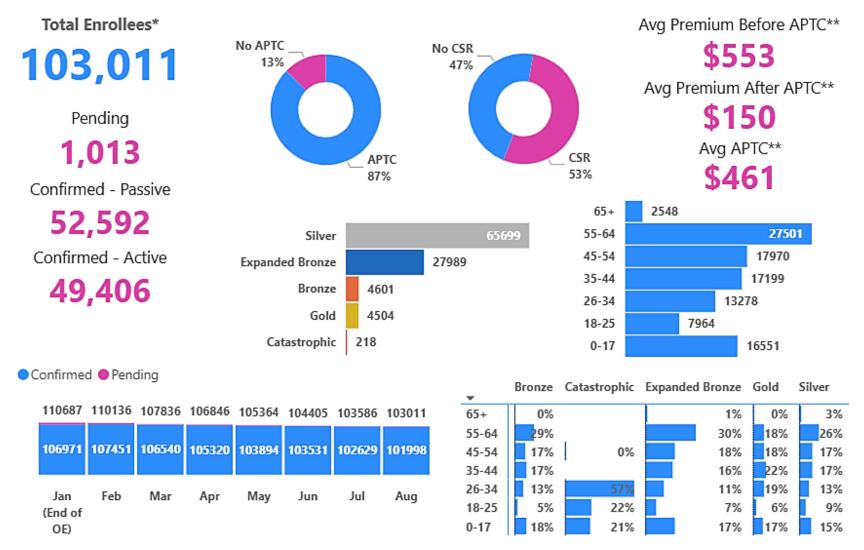


^{*}Includes unique enrollees with a PY25 plan selection in Confirmed or Pending status as of 8/1/25. Consumers with Terminated or Cancelled policies have been removed from these counts.

August 2025 Enrollment Summary

Health Enrollees – All Counties





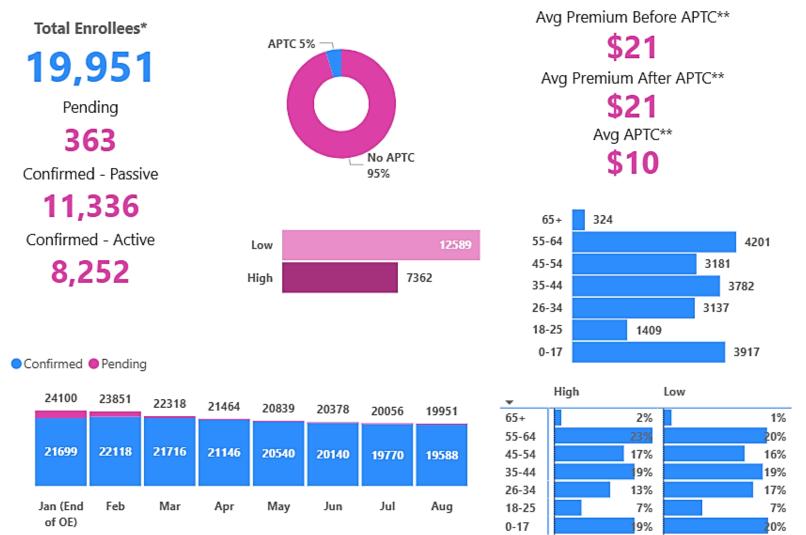
^{*}Includes unique enrollees with a PY25 plan selection in Confirmed or Pending status as of 8/1/25. Consumers with Terminated or Cancelled policies have been removed from these counts;

^{**}Average Premium values are monthly averages for all enrollees; Average APTC is the monthly average for enrollees with monthly APTC > \$0.

August 2025 Enrollment Summary

Dental Enrollees – All Counties





^{*}Includes unique enrollees with a PY25 plan selection in Confirmed or Pending status as of 8/1/25. Consumers with Terminated or Cancelled policies have been removed from these counts;

^{**}Average Premium values are monthly averages for all enrollees; Average APTC is the monthly average for enrollees with monthly APTC > \$0.

Enhanced Premium Subsidies – Background

- Starting in 2021, the American Rescue Plan Act (ARPA), followed by the Inflation Reduction Act in 2022, allowed more households to become eligible for subsidies AND increased the amount of subsidies available to eligible households
- These enhanced subsidies are set to expire at the end of plan year 2025 (i.e., we would return to the contribution thresholds similar to the ones in effect prior to PY2021)

Enhanced Premium Subsidies – Operational Impacts

- We are proceeding with the assumption that the enhanced subsidies will expire on 12/31/25 and will not be available in PY2026
- All PY2025 applications will continue to be evaluated with the enhanced subsidies through the end of 2025
 auto-renewals will include non-enhanced subsidy amounts
- Consumer messaging will be important (renewal notices)
- GI is preparing for a possible late extension of the enhanced subsidies by Congress and has contingency plans in place

APTC Calculation Review

Maximum APTC = (Second Lowest Cost Silver Plan Premium) - (Monthly Income x Contribution %)

<u>Second Lowest Cost Silver Premium</u> is the monthly cost of the second lowest cost silver plan available to the enrollment group in their rating area

Monthly Income is the household's monthly income

<u>Contribution %</u> is the percentage of monthly income that a household at a certain FPL is expected to spend on their health insurance (defined by the IRS)

- → ARPA lowered these contribution percentages, which increased APTC across the board
- If the enhanced subsidies expire, we will return to contribution percentages similar to the pre-ARPA amounts

			Non-Enhanced
Household Income as %	Pre-ARPA	Enhanced	PY2026
of Federal Poverty Line	Contribution %	Contribution %	Contribution %
At least 100% but less			
than 133%	2.07%	0.0%	2.10%
At least 133% but less			
than 150%	3.10 - 4.14%	0.0%	3.14 - 4.19%
At least 150% but less			
than 200%	4.14 - 6.52%	0.00 - 2.00%	4.19 - 6.60%
At least 200% but less			
than 250%	6.53 - 8.33%	2.00 - 4.00%	6.60 - 8.44%
At least 250% but less			
than 300%	8.33 - 9.83%	4.00 - 6.00%	8.44 - 9.96%
At least 300% but less			
than 400%	9.83%	6.00 - 8.50%	9.96%
At least 400% and higher	100.00%	8.50%	100.00%

Enhanced Premium Subsidies – Estimated Enrollee Impact

	PY25 Enrollees	% of PY25 Enrollees	Avg Net Premium Increase (Or APTC Decrease)			
Keep APTC	89683	81%	\$74			
Lose APTC	6440	6%	\$267			
No APTC Before & After	14564	13%	\$0			
Total	110687	100%	\$76			
>400% FPL	7344	7%	\$217			
>350% and ≤ 400% FPL	3593	3%	\$65			
>300% and ≤ 350% FPL	5913	5%	\$97			
>250% and ≤ 300% FPL	10454	9%	\$108			
>200% and ≤ 250% FPL	18289	17%	\$93			
>150% and ≤ 200% FPL	25839	23%	\$80			
≥ 100% and ≤ 150% FPL	26386	24%	\$41			
<100% FPL	2965	3%	\$0			
Unknown	9904	9%	\$0			
Total	110687	100%	\$76			
▼						
Service Area 1	88635	80%	\$68			
Service Area 2	13736	12%	\$93			
Service Area 3	5713	5%	\$123			
Service Area 4	2603	2%	\$134			
Total	110687	100%	\$76			

Estimates apply non-enhanced PY2026 contribution %'s to all PY2025 health enrollees in pending or confirmed status directly following OE, assuming no other changes;

[&]quot;No APTC Before & After" includes enrollees currently not requesting financial assistance and enrollees eligible for APTC but who opted not to receive any

Plan Certification

- Plan Year 2026 Plan Data for issuers WITHOUT objections have been transferred from SERFF to the SBE Platform as of August 8, 2025 @ 10 AM.
- Issuers **WITH OUTSTANDING OBJECTIONS** were **NOT** transferred and plan preview is currently not available. Data transfer will be initiated **ONLY AFTER** the objections have been resolved.
- Plan Preview ends August 29, 2025. It is imperative that carriers review all plans and mark them as "Verified" prior to the completion of Plan Preview.
- Please check rates and URLS. This is your opportunity to make corrections if data is not displaying correctly.
- Both the DOI and SSHIX have noticed version number issues between filings.
 Please be aware that whatever template version is in the Templates tab is what is transferred to the platform.
- At this point in the process, it is critical to notify David Millar via email of any and all template changes that are uploaded in SERFF. This is to ensure that updates are not missed and can be re-transferred in a timely manner. This process also re-triggers the entire Verified process for ALL plans under the issuer.

Plan Certification - Continued

- The final data transfer from SERFF to the Nevada Health Link SBE Platform will be August 29, 2025.
- Please be on the lookout for the Plan Year 2026 DRAFT Issuer Agreements. These will be sent out in the next two weeks.
 - Documents to be reviewed:
 - 1. Draft Issuer Agreement
 - 2. Exhibits
 - 3. SSHIX Plan Certification Guide
 - a. Updated NVHL 2025 Policy Manual
 - b. Attestations
 - c. Billing Agreements

Please pay careful attention to the following due dates (This is an aggressive timeline):

- 1. Draft Issuer Agreements to be sent to carriers on 8/20/25
- 2. Edits/suggestions due from carriers by COB on 9/3/25
- 3. Final Issuer Agreements sent to carriers on 9/5/25
- 4. Final **SIGNED** Issuer Agreements returned to SSHIX on 9/16/25
- 5. Final **COUNTER SIGNED** Issuer Agreements sent to carriers on 9/24/25

Nevada Health Link Quick Reference Guide

Plan Year 2026 Regulatory Updates

Overview

The passage of the CMS Marketplace Integrity and Affordability Final Rule and H.R.1 (One Big Beautiful Bill Act) introduced significant changes to State-Based Exchanges (SBEs) operations and ACA Marketplace consumers' eligibility. In addition to Federal updates, the Battle Born State Plans will be offered on Nevada's Exchange beginning PY2026. Nevada Health Link is also tracking the potential expiration of Enhanced Premium Tax Credits (EPTC).

This Quick Reference Guide was created by Nevada Health Link to provide a comprehensive guide of applicable updated provisions for our partners to better serve Nevada consumers.







2025 Federal Regulatory Changes

Effective August 25, 2025

- Income Data Matching Issues: Eliminate 60-day extension for income DMIs. All income inconsistencies must be resolved within 90-days.
- DACA Exclusion: Remove DACA recipients from Marketplace eligibility; terminate existing coverage for DACA recipients effective date of the CMS Final Rule.
- o **Premium Payment Rules:** Allows issuers to deny coverage for unpaid premiums.
- Income verifications: When data sources indicate income is less than 100% FPL,
 but the consumer's attested income is over 100% FPL, a DMI will be issued.
- Tax data unavailable: If tax data is unavailable to verify an applicant's income, attestation alone will not be accepted, a DMI will be issued for additional income supporting documentation.

2026 Federal Regulatory Changes

Effective January 1, 2026

- Recapture of Excess Premium Tax Credits: Requires that all premium tax credit recipients repay the full amount of any excess, no matter their income.
- Failure to Reconcile (FTR)***: Restricts PTC eligibility for enrollees who fail to file/reconcile their PTC for one year. PY27 will revert to two-year period.
- Premium Payment Thresholds***: Remove fixed-dollar and percentage-based thresholds temporarily.
- Sex-Trait Modification Exclusion: Ensure compliance with EHB prohibition.
- Actuarial Value (AV) Ranges: Adjust QHP certification to accommodate new AV ranges.
- Medicaid Ineligibility Periods: If an individual is not eligible for Medicaid due to their immigration status and is at or below 100% FPL, they will not be eligible for premium subsidies.
- Health Saving Account (HSA) Expansion: Allowance of Health Saving Accounts (HSAs)
 extended to all Bronze and Catastrophic plans.



Battle Born State Plans (BBSPs)



A few specific carriers have contracted with the State of Nevada to offer health insurance plans that have built in discounts to Nevadans.

Battle Born State Plans (BBSP) will have the same essential benefits, protections, and cost-sharing reductions as other Qualified Health Plans and comply with all applicable state and federal regulations as Qualified Health Plans currently offered through Nevada Health Link.

The only difference between BBSPs and other plans is that BBSPs are required to meet premium reduction targets. This means more Nevadans may be able to find quality coverage at a lower cost—regardless of income and still get the benefits they need.

Potential Expiration of Enhanced Premium Tax Credits

Enhanced Premium Tax Credit Expiration

Enhanced Subsidies Overview: The American Rescue Plan Act (ARPA) and the Inflation Reduction Act (2022) increased eligibility and subsidy amounts for households. These enhanced subsidies are set to expire at the end of plan year 2025.

Expiration Details: Post-2025, subsidy contribution thresholds will revert to pre-2021 levels. Nevada Health Link is operating under the assumption that enhanced subsidies will end on 12/31/2025 and will not be available in plan year 2026.

Application and Renewal Process: All PY2025 applications will be evaluated with enhanced subsidies through the end of 2025. Auto-renewals for 2026 will include non-enhanced subsidy amounts.

August RCNI Submission

- The next RCNI Submission Deadline is <u>Thursday</u>, <u>August 21</u>.
- Carriers are expected to submit an RCNI for Plan Year 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		Χ	Χ
April 2025	Monday, April 21		Χ	
May 2025	Monday, May 19		Χ	
June 2025	Thursday, June 19		Χ	
July 2025	Monday, July 21		X	
August 2025	Thursday, August 21		<u>X</u>	
September 2025	Thursday, September 18		Χ	
October 2025	Monday, October 20		Χ	
November 2025	Thursday, November 20	Χ	Χ	
December 2025	Thursday, December 18	Χ	Χ	Χ

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: mranson@exchange.nv.gov