



Where Health Insurance Competes for You.

Silver State Health Insurance Exchange Advisory Board

Division of Consumer Health Services

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February 24, 2026

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State Policy Updates

Senate Bill (SB) 4 from the 36th (2025) Special Session

- **(Sec. 10) - Broker Compensation Funding**
 - Appropriations to compensate brokers for enrolling individuals in Public Option plans.
- **(Sec. 11) - Community Outreach Grants**
 - Allocations for grants to community-based organizations to support education and enrollment in Medicaid and Public Option plans.



Federal Policy Updates

- Enhanced PTCs expired 12/31/2025
- 2025 Marketplace Integrity and Affordability Rule
- H.R.1 (One Big Beautiful Bill Act)
- CMS released plan year (PY) 2027 Notice of Benefit and Payment Parameters (NBPP) [Proposed Rule](#)



2025 Marketplace Integrity & Affordability Rule

Shortened Open Enrollment Period (OEP) for PY27

- Shortens the annual OEP to a maximum of 9 weeks and must end no later than December 31st. Also requires all OEP enrollments take effect on January 1 of the plan year.

Shortened Window to Submit DMI Documentation

- Consumers provided with 90-days to resolve data matching issues (DMI) (removal of 60-day extension)



Provisions Currently Under Court Stay Order:
City of Columbus v. Kennedy, No. 25-cv-2114



H.R.1 (One Big Beautiful Bill Act)

Plan Year 2026

- No APTC for lawfully present immigrants who are **both** ineligible for Medicaid due to immigrant status (5-year waiting period) **and** are making below 100% of poverty.
- Recapture of **excess premium tax credits** removing income caps.

Plan Year 2028

- Requires Marketplace enrollees to have their enrollment information **actively verified** each year prior to receiving an APTC or CSR.
- APTC **cannot be awarded until all eligibility verification is complete.**

- Further limiting APTC eligibility to certain non-citizens.
- Prohibits** eligibility for **premium tax credits for individuals not eligible for Medicaid** because of failure to meet community engagement requirements.

Plan Year 2027



PY27 NBPP Overview

CMS PY 2027 Notice of Benefit and Payment Parameters (NBPP)

[Proposed Rule](#)

- Proposed Rule Released: February 9, 2026
- Comments Due: March 13, 2026
- Final Rule: Date TBD; majority of provisions effective Jan. 1, 2027



PY27 NBPP Key Proposals

Implements Provisions of H.R. 1

- Narrowing eligibility for premium tax credits (PTCs)
- Disallow Subsidy Eligibility for Certain Immigration Statuses

State-Based Marketplaces (SBMs)

- Loosen certification standards
- Permit privatization of eligibility/enrollment functions
- State Exchange Improper Payment Measurement Program

High-Deductible Plans

- Raise out-of-pocket cost-sharing limits
- Expand catastrophic plan eligibility
- Multi-Year Catastrophic Plans

Marketplace Integrity

- Extend provisions from 2025 rule beyond 2026
- Burdensome Income Verifications

Network Adequacy

- Allow “non-network” plans
- Reduce federal oversight; expand state authority

Essential Health Benefits (EHB)

- States must defray cost of most post-2011 mandated benefits
- Removal of adult dental as EHB



Questions?



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