

Silver State Health Insurance Exchange

Monthly Meeting of Nevada's
On-Exchange Insurance Carriers

April 13, 2021



nevada
health link

Introductions - SSHIX

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Agenda

- Plan Cert Update
- ARPA Update: Implementation Project Plan
- ARPA Update: Q&A from Carriers
- ARPA Update: Communications and Outreach Plan
- ARPA Update: Public Relations Strategies and Tactics
- April RCNI Submission
- Q&A

Plan Cert Update

- The Exchange is currently tracking the release of an additional Notice of Benefit and Payment Parameters (NBPP) for PY2022, and we will include any pertinent guidance in the Plan Year 2022 Final Letter to Issuers.
- The final letter will be completed once the additional NBPP is released and reviewed, after which the Exchange will update carriers with a publication date. The responses to public comment will be published at this time also.

ARPA Update: Timeline/Project Plan

- Nevada Health Link is targeting on or around April 19, 2021 for full implementation of ARPA subsidy and Unemployment Insurance rules.
- This timeline and implementation requires an enormous amount of testing and may require additional time, however the Exchange is confident in this target date of implementation.
- Rule changes will only apply prospectively:
 - Consumer-driven changes made after the ARPA implementation will take effect on a “first of the following month” basis.
 - The earliest possible effective date for existing consumers to receive increased or expanded subsidy eligibility* is May 1, 2021.

*The Exchange has been using “increased eligibility” to refer to consumers who were previously eligible for subsidies and who will receive an increase in their Group Max APTC eligibility. “Expanded eligibility” refers to consumers who were not previously eligible for APTC due to excess income, but who are now eligible for subsidies due to the ARPA legislation (i.e. removal of the 400% FPL “cliff”).

Timeline/Project Plan (continued)

- During the initial rollout period, which is anticipated to run from approximately mid-April through early June, currently enrolled consumers will need to take action in order to claim their new subsidy eligibility.
- This requirement was necessary to ensure the quickest possible rollout of the new eligibility rules, which is being accomplished by leveraging existing application and eligibility workflows. Details on our consumer messaging plan will be provided later on in this presentation.
- Nevada Health Link is planning to run batch jobs sometime in June to apply increased or expanded APTC eligibility to existing consumers who requested subsidy assistance on their applications, but who did not take action during the initial rollout period. The effective date of the new eligibility will be June 1, 2021.
 - The batch jobs will only apply to consumers whose enrollments are currently subsidized, or who requested subsidy assistance but were determined financially ineligible due to excess income; consumers with non-subsidized enrollments will need to update their existing applications and provide their current household income in order to claim their expanded eligibility.

Timeline/Project Plan (continued)

- Nevada Health Link will extend the duration of the current Special Enrollment Period/Open Enrollment Period from May 15, 2021 through August 15, 2021 to match the federal (HealthCare.gov) extension.
- Nevada Health Link anticipates SEP rule changes to allow consumers to change plans – this will be in effect in April of 2021. This means consumers will have an opportunity to change their plans between April 19th and August 15th.
- Nevada Health Link will publish resources for consumers on how to work with the IRS for those who filed their taxes prior to the passage of the ARPA:
 - Helpful IRS Resources Q&A on the ARPA Premium Tax Credit:
<https://www.irs.gov/pub/irs-pdf/p4849.pdf>
<https://www.irs.gov/affordable-care-act/individuals-and-families/questions-and-answers-on-the-premium-tax-credit>

Q&A From Carriers

Question #1: Does the Exchange plan to re-determine or automatically re-determine consumer eligibility for APTC?

Answer: Nevada Health Link plans to automatically re-determine consumer eligibility during the second phase of our three-phased approach:

- a) Phase 1: On or around April 19, 2021, consumers (or their enrollment professionals) can take action to claim increased or expanded subsidy eligibility, including consumers who qualify for increased APTC because they were approved to receive Unemployment Insurance (UI) benefits during 2021. Please note that UI recipients must update their applications and explicitly attest to having been approved to receive UI benefits in 2021 in order to claim their full, increased eligibility.
- b) Phase 2: Currently scheduled for some time in June, this phase will involve the automatic re-determination of financial eligibility for existing consumers who requested subsidy assistance on their applications. This phase will only include those consumers who did not take action during Phase 1. Please note that NV consumers who are newly eligible for subsidies due to the removal of the 400% FPL “cliff” will need to log back into their Nevada Health Link account to apply their subsidy increases to their existing enrollments.
- c) Phase 3: Expansion of call center hours and staff.

Q&A From Carriers (continued)

Question #2: Does the Exchange plan to re-run eligibility for all Exchange enrollees, or only a subset of enrollees? If the latter, which consumer population subset(s)?

Answer: We plan to re-run eligibility in June for ALL current enrollees who requested a financial determination on their application, but who did not take action during Phase 1 to claim their increased eligibility.

For consumers who may have previously reported UI income on their applications—but who did not take action during Phase 1 to update their applications and explicitly attest to receiving UI benefits in 2021—we will re-run eligibility based upon the new FPL rules, however we will not automatically max-out their APTC/CSR under the new UI rules. Please note that consumers who have been approved to receive UI benefits in 2021 must take action to update their applications and provide their UI attestation before they can claim their max APTC/CSR subsidies.

In addition, no new consumers who submit their initial enrollments during Phase 1 will be considered for automatic re-determination during Phase 2.

Q&A From Carriers (continued)

Question #3: Do you have different redetermination plans/approaches for consumers who are under 400% FPL vs. consumers who are over 400% FPL? If so, please describe the Exchange's plans for re-determining eligibility for these two groups, including any differences in timelines, consumer notices, and/or action required by consumers in order to receive updated APTC.

Answer: For consumers who requested to be considered for subsidy assistance when they submitted their application, but who did not previously qualify for subsidies because their reported income was above 400% FPL, we will re-determine subsidy eligibility in the same fashion as for consumers whose income was under 400% FPL. However, for consumers with income above 400% FPL we will not automatically apply the APTC. These consumers will need to log in and actively apply the new subsidies to their existing enrollments.

Question #4: What is the estimated volume/number of consumers for which you will re-determine eligibility?

Answer: Approximately 73,000 Nevada consumers are currently enrolled in plans that are tied to a "financial" application (i.e. subsidy assistance was requested, and income data was provided). Of this population, any consumers who do not take action during Phase 1 will have their subsidy eligibility automatically re-determined in Phase 2.

Q&A From Carriers (continued)

Question #5: When and how does the Exchange plan to notify consumers of their re-determined eligibility, or potential eligibility for updated APTC?

Answer: For consumers whose current enrollments are tied to “financial” applications, Nevada Health Link will send a Universal eligibility notice in Nevada Health Link consumer accounts/secure inboxes once their subsidy eligibility is re-determined. For consumers whose current enrollments are tied to “non-financial” applications (i.e. no subsidy assistance was requested, and no income data was provided) Nevada Health Link will coordinate a bulk email campaign to notify these consumers of the steps required to have their subsidy eligibility determined.

Question #6: Does the Exchange plan to provide retroactive APTC, such that for the remainder of the plan year, consumer premiums are adjusted to account for the additional APTC for which they were eligible between January 1, 2021 and the SBE’s implementation of APTC changes?

Answer: No. The Exchange has collaborated with other states on the subject of retro-application of APTC. Alongside with other states and hc.gov the Nevada Exchange has chosen not to provide retro-application on APTC. We agree with other states that this would allow for more space on reconciliation during tax time in the event income was reported incorrectly. Our focus was to have ARPA rules built and implemented as quickly and effectively as time permitted.

Communications/Outreach Plan

Goals of the Communications and Outreach Plan

- Build awareness of the enhanced offerings and consumer cost savings through ARPA on Nevada Health Link.
- Educate existing on-Exchange consumers—and their enrollment professionals—about the steps required to claim increased or expanded eligibility under the new ARPA rules.
- Educate Nevada’s Uninsured Marketplace-Eligible population, as well as currently Insured Off-Exchange Enrollees, on how Nevada Health Link can help them save money while staying insured.

Comms/Outreach Plan (continued)

Obstacles for Consideration

The Congressional Budget Office projects that throughout 2021 and 2022, only about 10% of the uninsured population who are eligible for increased subsidies under the American Rescue Plan Act will enroll in new coverage, and only about 20% of those who are currently insured but unsubsidized will enroll in subsidized plans. They think millions of Americans will leave big money on the table for good reasons:

- Most uninsured want insurance, they just don't think they can afford it. The CBO does not think the American Rescue Plan will change that.
- The American Rescue Plan is starting "mid-year" when consumers are less likely to switch.
- Since the program is temporary, many will just sit on the sidelines.

Public Relations Strategies/Tactics

Public Relations Plan

Create/Distribute a press release announcing ARPA enhancements offered through Nevada Health Link, including data points and education on what this means for target audiences.

- Distribute to statewide media and stakeholder list
- Along with the press release, include any consumer-facing marketing materials (English & Spanish) that news outlets and stakeholders can share on their platforms:
 - Nevada Health Link Talking Points
 - FAQs for NV consumers
 - Fact Sheet
 - Email marketing for consumers, brokers and navigators, and insurance carriers

Hypothetical Cost Scenarios

The [“Individual and Family Scenarios” page of our website](#) has been updated to include a comparative analysis of eligibility before ARPA versus eligibility after ARPA, for a variety of household size and income scenarios.

Additional ARPA Resources

Please note that the latest information regarding the Exchange's ARPA implementation will always be available on our website at the following link:

<https://www.nevadahealthlink.com/americanrescueplan/>

For additional information regarding the Exchange's Messaging and Community Relations Plans please contact Janel Davis, SSHIX Communications Director, at:

j-davis@exchange.nv.gov

April RCNI Submission

- The next RCNI Submission Deadline is **Monday, April 19**
- Please note that submission of Plan Year 2020 enrollments is not required in April
- SSHIX has published a calendar of [monthly RCNI Submission Deadlines](https://www.nevadahealthlink.com/partner-resources/carriers/) to Nevada Health Link's Carrier Resources Page at <https://www.nevadahealthlink.com/partner-resources/carriers/>

Month	Submission Deadline	2021 RCNI?	2020 RCNI?
January	Thursday, January 21 st	X	X
February	Monday, February 22 nd	X	X
March	Monday, March 22 nd	X	X
April	<u>Monday, April 19th</u>	X	
May	Thursday, May 20 th	X	
June	Monday, June 21 st	X	
July	Monday, July 19 th	X	
August	Thursday, August 19 th	X	
September	Monday, September 20 th	X	
October	Thursday, October 21 st	X	
November	Monday, November 22 nd	X	
December	Monday, December 20 th	X	X

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 Danielle Andersen, SSHIX Plan Certification Manager at:

pmanagement@exchange.nv.gov

Please submit Policy-related questions to Jamie Sawyer, SSHIX Policy Manager at:

jlsawyer@exchange.nv.gov