

Section 7: Attached Materials

- Appendix A: 1332 Waiver Checklist
- Appendix B: State Operations Budget for the Public Option
- Appendix C: Public Session Materials
- Appendix D: Additional Public Engagement Materials

APPENDIX A:

CCIIO Checklist for Section 1332 State Relief and Empowerment Waivers

CCIIO Checklist for Section 1332 State Relief and Empowerment Waivers

The table below lists each item in the CCIIO Checklist for Section 1332 State Relief and Empowerment Waivers Applications (Updated July 2019) and discusses how Nevada addresses each issue and/or directs the reader to other parts of this report.

	HHS Citation and Description	Actuary Response
1.	45 CFR 155.1308(a), (b), (c), (d) Application format, application timing, preliminary review, notification of preliminary determination.	This report is intended to be an attachment to Nevada's 1332 waiver application. The actual application submission date is not known as of the date of this report.
2.	45 CFR 155.1308(f)(2) Written evidence of the state's compliance with the public notice and comment requirements, set forth in 45 CFR 155.1312.	See Section 4 of waiver application
	Written evidence of the state's compliance with the public hearing's requirements, set forth in 45 CFR 155.1312.	See Section 4 of waiver application
	Written evidence of state's compliance with the meaningful Tribal consultation requirements (if the state has one or more Federally-recognized Indian tribes), set forth in 45 CFR 155.1312.	See Section 4 of waiver application
3.	45 CFR 155.1308(f)(3)(i), (ii) Comprehensive description of state's enacted legislation and program to implement a plan meeting the requirements for a section 1332 waiver and a copy of the state's enacted legislation	See Appendices B and C
4.	45 CFR 155.1308(f)(3)(iii) List of provision(s) of the law that the state seeks to waive and reason for the specific request(s).	See Section 1B of waiver application

	HHS Citation and Description	Actuary Response
5.	<p>45 CFR 155.1308(f)(4)(i)-(iii)</p> <p>Actuarial analyses and actuarial certifications</p> <p>Economic analyses Data and assumptions</p> <p><i>*Note a state can combine the elements of an actuarial analysis and economic analysis into one report or submit separate actuarial and economic reports</i></p>	<p>1. See Appendix A for the actuarial certification.</p> <p>i. See Section 4B for a demonstration that the Nevada Section 1332 waiver complies with the coverage requirement.</p> <p>a. See the Exhibits section</p> <p>ii. See Sections 4A and 4C for a demonstration that the Nevada Section 1332 waiver complies with the comprehensiveness and affordability requirements.</p> <p>a. See the Exhibits section</p> <p>b. See the Exhibits section</p> <p>2. See Section 5</p> <p>3. See Section 6</p> <p>The Nevada 1332 waiver impacts the individual market. The baseline projection and a comparison to the projection under the waiver are included in Sections 4 and 5.</p> <p>The required analyses are included as noted below:</p> <ul style="list-style-type: none"> ▪ Exhibits 1A.3, 1B.3, 2A.3, and 2B.3: Non-group market enrollees by income as a share of FPL. ▪ Exhibits 1A.1, 1B.1, 2A.1, and 2B.1: Overall average non-group market premium rate. ▪ Exhibits 1A.2, 1B.2, 2A.2, and 2B.2: SLCS plan rate. ▪ The State of Nevada uses the federal default age rating curve. ▪ Section 5: Aggregate premiums and PTC. ▪ The State of Nevada uses a state-based platform. Costs are assumed to be the same both with and without the waiver. ▪ Sections 4 through 6: Documentation of all assumptions and methodologies used to develop the projections and growth of healthcare spending.

	HHS Citation and Description	Actuary Response
		Nevada is not considering establishing a Risk Stabilization Waiver Concept as part of this 1332 waiver application.
6.	45 CFR 155.1308(f)(4)(iv) Draft timeline for implementation of the proposed waiver.	See Section 1D of waiver application
7.	45 CFR 155.1308(f)(4)(v)(A)-(E) Additional Information.	See Section 5 of waiver application
8.	45 CFR 155.1308(f)(4)(vi) Reporting targets.	See Section 5.E of waiver application
9.	83 FR 53575 Administration's Principles.	See waiver narrative

APPENDIX B:

State Operations Budget for the Public Option

Estimated Annual SFY Budget Costs for State Operations, Starting SFY2026

NRS 695K.300 provides that pass through funds shall be used to pay for the costs associated with carrying out the statutes pertaining to the administration of the public option at the state level. Below are estimated state administrative costs associated with operating the new public option as outlined under state law in NRS 695K.

Silver State Health Insurance Exchange Operation Costs for Public Option	
Increased Navigator Program Costs	\$500,000.00 per SFY
Additional Staffing Costs for Certification/Policy	\$250,000.00 per SFY
Increase Technology Vendor Costs (GetInsured)	\$1,000,000.00 per SFY
Estimated subtotal	\$1,750,000.00 per SFY
Nevada Medicaid Operation Costs for Public Option	
New Staffing Costs for Contracts/Waiver	\$400,000.00 per SFY
New Legal Fees for Deputy Attorney General	\$100,000.00 per SFY
New Public Option Actuary Fees	\$1,500,000.00 per SFY
Estimated subtotal	\$2,000,000.00 per SFY
Estimated Total Operational Costs	\$3,750,000.00 per SFY

Furthermore, NRS 695K.200 also provides that any additional federal dollars received as pass-through funds pursuant to a 1332 waiver may be used by the Director of Nevada Medicaid to increase consumer affordability. At this time, the State is requesting use of remaining funds to be used to finance new state premium subsidies to improve affordability of qualified health plans in the Exchange.

APPENDIX C:

Public Comment Materials

Public comment materials include:

1. The materials from the six public design sessions DHHS hosted in December 2021 and January 2022
2. Tribal consultation and public comment materials, to be added to the application following the state public comment period

APPENDIX D:

Additional Public Engagement Materials

- Public comment letters submitted by stakeholders during the six design sessions held in December 2021 and January 2022: [Link](#)
- September 2021 Actuarial Study Informational Webinar: [Slides](#) and [Recording](#)
- Questions and Answers for the Nevada Public Option: [Link](#)
- Fact Sheet – Nevada Public Option: [Link](#)