

Notice of Benefit and Payment Parameters (NBPP) PY2025

NBPP Provisions Overview

- Proposes new federal standards for certain marketplace operational procedures, and would require state-based marketplaces (SBMs) to implement new network adequacy requirements
- Provides additional flexibilities for state implementation of Essential Health Benefit (EHB) standards
- Would remove certain administrative barriers that prevent individuals from gaining and maintaining coverage, while extending enrollment opportunities during the plan year
- Provides guidance for states on the federally-facilitated marketplace (FFM) and state-based marketplaces on the federal platform (SBM-FP) regarding the implementation of standardized and non-standardized plans and asks whether it should require state-based marketplaces (SBM) to implement standardized plans
- Would require state agencies, including marketplaces, to pay to use an optional federal income verification data check that Pennie currently uses

Pennie NBPP Comments Submission Overview

- Pennie is seeking approval to provide comments in the following areas only:
 - Support the proposal giving states the option to include adult dental and vision benefits as part of its EHB standards, while no longer considering additional benefits covered in a state's EHB-benchmark plan subject to cost defrayal
 - Support allowing Exchanges to accept self-attestations of incarceration status, as well as the clarification that issuers have the flexibility to extend monthly premium payment deadlines when technical issues or other problems arise
 - Support making the monthly Special Enrollment Period (SEP) for individuals with household income less than 150% of the federal poverty level (FPL) permanent
 - Oppose the proposal requiring SBMs to establish their own network adequacy standards that are "at least as stringent" as FFM's standards; in Pennsylvania, this falls under the jurisdiction of the Insurance Department, and thus would require Pennie to supersede state law
 - Oppose charging Exchanges for use of the Verification of Current Income (VCI), or Equifax, check. This proposal undermines Pennie's efforts to reduce the burden of income data matching issues (DMIs) on our customers and our operational resources
 - Encourage CMS to provide state flexibility regarding standardized plans