

Draft 2027 QHP Guidance for Participation

Plan Certification Workgroup

Dec. 2, 2025

Agenda

- ▶ Welcome & introductions
- ▶ Legislative update
- ▶ Potential new Exchange QHP certification criteria for PY 2027
- ▶ Updates under consideration for PY 2027 QHP Guidance for Participation
- ▶ Next steps and adjourn

Legislative update

Potential new Exchange QHP certification criteria for PY 2027

Proposal of new Exchange certification criteria

- ▶ Proposed new access and affordability standards for QHPs certified on the Exchange
- ▶ Proposed PY 2027 access and affordability standards would focus on:
 - ▶ Preventing bare counties
 - ▶ Ensuring a range of premiums available in all counties
- ▶ Proposed revised timeline & process

Proposed Access and Affordability Standards for PY 2027

- ▶ Preventing underserved counties
 - ▶ Intent to ensure more than one carrier offering Exchange coverage in each county in 2027
 - ▶ Requirement applies to carriers providing coverage in rating area and expanding coverage in counties with 7+ carrier options
 - ▶ Definition of “underserved” for 2027
- ▶ Ensuring range of premiums
 - ▶ Coverage proposed in underserved counties must include bronze, silver, and gold metal levels
- ▶ Waiver process
 - ▶ Exchange will work with carriers starting in winter to understand any barriers to meeting requirements for 2027 and will consider waivers if in the interest of residents of Washington State

Quality

Current Exchange performance standards

- ▶ Directly reported race and ethnicity data on at least 80% of customers
- ▶ Cervical cancer screening a required QIS measure with expected rate of at least 65% (QRS 75th percentile)
- ▶ Phased out for 2026: Antidepressant medication management on QIS with minimum QRS 75th percentile score



Many Exchange carriers performing below national midpoint on key metrics

- ▶ Cervical and breast cancer screening rates are low — customers not receiving critical preventive care
- ▶ Many Exchange customers with high blood pressure do not have condition managed

Measure MY2024	Bridgespan	CHPW	Coordinated Care	Kaiser Northwest	Kaiser Washington	Lifewise	Molina	Premera	Regence BCBS of Oregon	Regence BlueShield of WA	United HealthCare OR
Cervical Cancer Screening	53%	47%	59%	79%	77%	61%	63%	75%	61%	64%	57%
Breast Cancer Screening	64%	64%	63%	78%	74%	71%	68%	80%	61%	76%	71%
Controlling High Blood Pressure	55%	73%	75%	74%	72%	65%	57%	66%	65%	67%	72%

QHP Compared to QRS Measure Scores	QHP Score Above/Below QRS 75th percentile
Blue (Best)	> 90th
Purple	75th-89th
Gray	50th-75th
Brown	25th-49th
Red (Worse)	< 25th

Timely completion of Quality Improvement Strategy (QIS)

- ▶ Issue: Subset of carriers having delays in QIS finalization
 - ▶ Plan year 2026 QIS deadline was Oct. 3
 - ▶ Four carriers did not finalize QIS until after start of OE



Exchange levers to drive quality improvement

Items in bold have not yet been applied

Additional transparency

- Progress report to Board on all carriers on quality standard attainment
- Carriers with poor performance present remediation plan to Board

Setting standards

- Defining high quality with expectations
- **Performance floor**

Customer nudging

- Quality incorporated into CDSS recommendations
- Plan display order
- **Additional display signals beyond QRS**

Financial incentives

- **Carrier Assessment tied to quality**
- **Cascade Care Savings eligibility tied to quality**

Market participation

- **Expansion of QHP or public option contingent on quality**
- **Decision not to certify**

Additional considerations

Open enrollment date change

- ▶ Federal regulations have changed PY 2027 open enrollment dates:
 - Prior OE dates: Nov. 1 – Jan. 15
 - New OE dates: Nov. 1 – Dec. 31
- ▶ Jan. 1 coverage start date



Federal regulatory considerations

- ▶ Additional regulatory changes
 - Coverage denials for past due premiums
 - Actuarial value de minimis ranges
 - Failure to reconcile
 - Premium payment threshold
- ▶ Bronze HSA compatibility



Discussion and next steps



Appendix

PY 2027 plan certification timeline

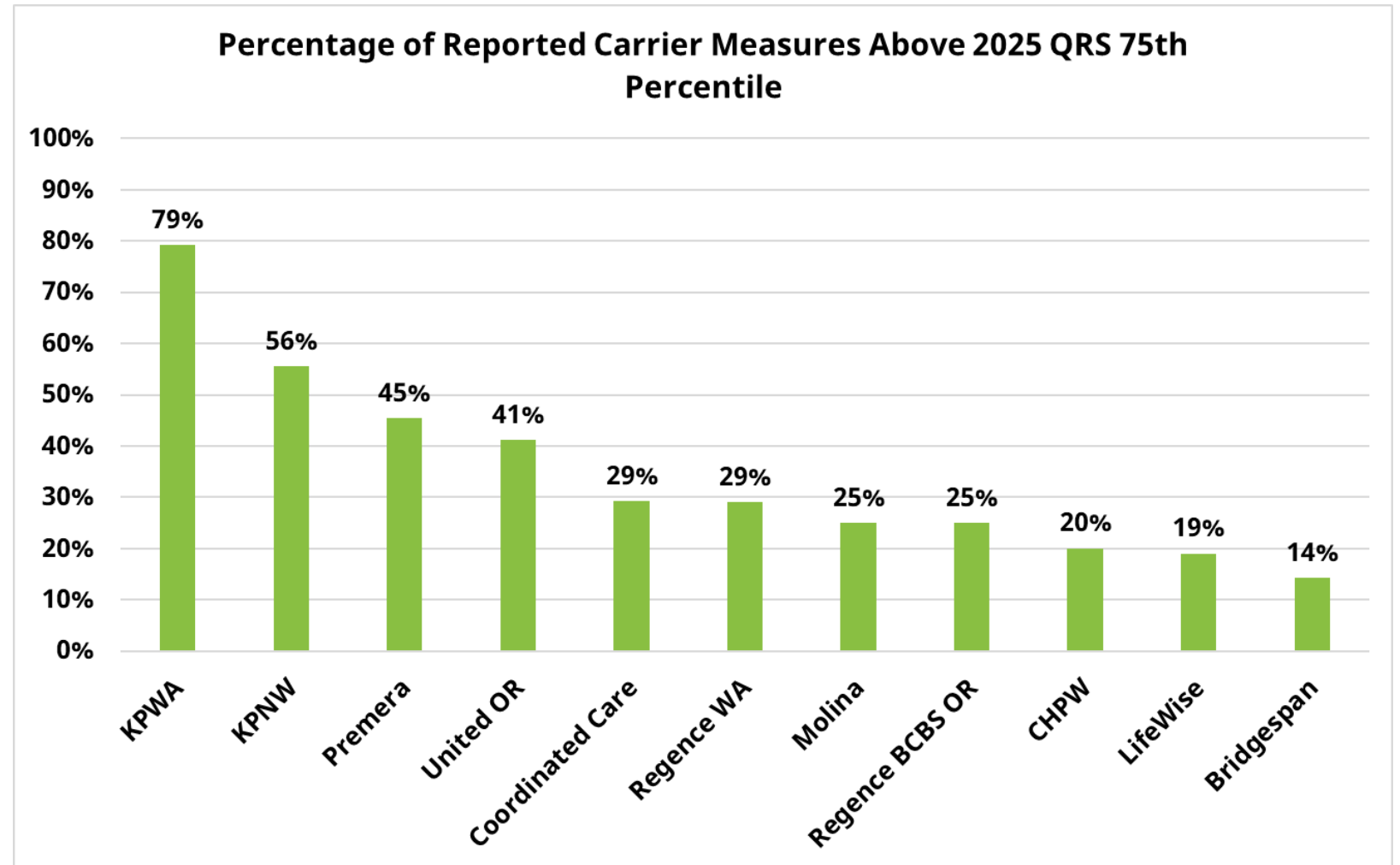


*E.g., cross mapping, quality forms, marketing brochures, participation agreements, accreditation, summary of benefits and coverage

Continuing challenges for Exchange quality improvement

- ▶ Most carriers score below QRS 75th percentile on majority of clinical quality measures*

*Did not rank measures with denominator under 30; for hospital readmissions, measure did not rank with denominator under 150



Beyond the QRS — Quality evaluation and use in plan display under federal and state law

- ▶ [RCW 43.71.070](#) “The board shall establish a rating system for QHPs to assist consumers in evaluating plan choices in the exchange. Rating factors established by the board may include, but are not limited to...
 - ▶ Promotion of appropriate primary care and preventive services utilization.”
- ▶ [CMS gives state exchanges flexibility](#) to make state-specific customizations, such as to incorporate additional state or local quality information alongside QRS



Premium payment threshold

Beginning in PY 2027, carriers will have the option to implement one of the three following premium payment thresholds

1

A fixed-dollar threshold of \$10 or less

2

Gross premium payment percentage-based threshold equal to or greater than 98%

3

Net premium payment percentage-based threshold equal to or greater than 95%

