

SSBM states will not be required to pay the 3.5 percent user fee for using Healthcare.gov in 2015. Another major point of difference between the SSBM and partnership marketplaces is that SSBM states are provided full autonomy in setting the marketplace user fees and establishing a plan for sustainability, while partnership marketplaces are required to use the 3.5 percent premium assessment that is required by the FFM.

For 2015, Nevada and Oregon have advertised that their agreements with CMS will allow them to retain 100 percent of their payer assessments, in essence allowing them to use the federal technology at no cost. Subsequent to 2015, it remains to be seen whether these states will ultimately be assessed a fee for using the federal marketplace website for enrollment. In fact, there are a number of issues that remain undetermined and CMS has yet to issue any formal guidance around the constructs of the SSBM model.

In a recent presentation to the Cover Oregon board of directors, consultants pointed out that "because Oregon is one of the first states to transition to an SSBM model, CMS is still developing standards, procedures and requirements related to the transition."

The availability of insurance subsidies is not jeopardized by federal court cases under the SSBM model. In forecasting the potential impact of the *Halbig vs. Burwell* case currently in the federal court system – which stands to remove the federal marketplace's ability to offer insurance subsidies – both Nevada and Oregon are comfortable with their designation as an SSBM. Documents relating to Nevada's transition to a SSBM model state that the marketplace will still be legally designated as a state-based exchange; therefore, all requirements of a state-based exchange continue to apply.

Nevada and Oregon's operations in 2015 will be barometers for the success of the long-term success of the SSBM model. To summarize, while formal guidance on this marketplace model is to be released, Nevada and Oregon are taking an innovative approach for marketplace administration. Their operations in 2015 could also be indicative of more states moving to a similar model and taking a more active role with marketplace administration.

*(Courtesy of HighRoads contributor.)*

- See more at: <http://www.highroads.com/newsroom/supported-state-based-marketplace-model-may-gain-traction/#sthash.k6QzA27X.dpuf>