

September 11, 2023

Dental Code D0431

To Whom It May Concern (PEBP QC, State of Nevada, Diversified Dental),

I am looking for advise and direction to approach the topic of change in coverage for Dental Code D0431 in a positive and constructive manner. I have recently become aware of the change in policy and disappointed as a practitioner and advocate for the health and well being of our patients. This has been a covered preventative benefit for 10+ years and this change was made without notice to your providers. I routinely use this code when using VELscope. The FDA-approved VELscope offers dentists another examination tool to help detect oral cancer in its earliest stages. The VELscope is a blue excitation lamp, which highlights precancerous and cancerous cell changes sometimes before they can visually be detected. This has been a valuable aid I have used for oral cancer screening for more than the past decade. I often inform patients with Nevada State Dental Insurance of their tremendous preventative benefits. I am confident this device has helped me identify cancerous and pre-cancerous lesions that I otherwise would not have diagnosed.

I strongly believe use of these techniques help in early detection, diagnosis and favorable morbidity and mortality rates for patients. Without notice this benefit has been removed from the plan. I know this will lead to patients experiencing a lower level of care. [REDACTED]

I feel the need to voice a strong opinion in opposition of this decision. My understanding is there is a meeting September 28, 2023 where issues such as this can be reviewed. I would like to encourage a re-evaluation of this decision that will lead to decreased standard of care for Nevada State Employees Health.

When my practice questioned the reasoning behind this decision I was sent statements that directed me to the United States Preventive Services Taskforce website. My opinion is these documents are out of date on the subject at hand. Especially with recent increased prevalence of HPV related cancerous lesions in the oral cavity. One documents states "Recommendations made by the USPSTF are independent of the US government. They should not be construed as an official position of the Agency for Healthcare Research and Quality or the U.S. Department of Health and Human Services." This article is dated November 15,2013. I do not find this date or statement

credible for this decision that will affect every patient. This is poor decision making leading to lower standards of care.

Suggestions for Practice Regarding the I Statement

This recommendation **is intended for primary care providers and does not pertain to dental providers or otolaryngologists**. Dental care providers and otolaryngologists may conduct a comprehensive examination of the oral cavity and pharynx during the clinical encounter.

Furthermore, it would have been nice to know before 07/01/2023 that changes were made to benefits so that patients could be informed of their costs in advance. This information should be shared with contracted providers. I was advised that every year I should preauthorize every dental code. This is not practical! It would lead to an abundance of unnecessary claims for the administrator to review in a timely fashion. Something that clearly is not happening based on the attached documents showing a lack of ability to properly manage the plan.

Please provide guidance as far as how I can productively motivate this subject to be reviewed and the appropriate decisions made to re-establish the coverage of this code that has been a standard of care for this patient base for more than a decade. This decision will save lives as well as significant health insurance expense when these lesions are detected as early as we have ability to accomplish this.

Benjamin T. Horgan, D.D.S.

Final Recommendation Statement

Oral Cancer: Screening

November 15, 2013

Recommendations made by the USPSTF are independent of the U.S. government. They should not be construed as an official position of the Agency for Healthcare Research and Quality or the U.S. Department of Health and Human Services.

Suggestions for Practice Regarding the I Statement

This recommendation is intended for primary care providers and does not pertain to dental providers or otolaryngologists. Dental care providers and otolaryngologists may conduct a comprehensive examination of the oral cavity and pharynx during the clinical encounter.

Status	Type	Year	Topic Name	Age Group	Grade	Category
Published	Screening	2018	Cervical Cancer: Screening	Adolescent, Adult, Senior	A, D	Cancer
Published	Counseling	2018	Skin Cancer Prevention: Behavioral Counseling	Adolescent, Adult, Pediatric, Senior	B, C, I	Cancer
Published	Screening	2016	Breast Cancer: Screening	Adult, Senior	B, C, I	Cancer
Published	Screening	2013	Oral Cancer: Screening	Adult, Senior	I	Cancer
Published	Screening	2011	Bladder Cancer in Adults: Screening	Adult, Senior	I	Cancer

Pages: 1

QC-1141: Dental Code D0431

From: [REDACTED]

To: [REDACTED]

Date: Thursday, August 31, 2023 at 03:35 PM PDT

Doctor Horgan – Outreach to your office was made today validating your e-mail address.

Your fax to PEBP was forwarded to Quality Control for review and response. This was assigned case QC-1141. Please reference this case number when communicating for this specific topic.

In 2022, PEBP underwent a compliance review that included a thorough review of plan benefits. The results of this were brought to the Board in the [01/26/2023 Board Meeting](#). The board was informed that some plan changes are required to comply with IRS rules (see notice 2019-45 as it relates to IRS section 223. This notice states, in part:

“Generally, under section 223(c)(2)(A), an HDHP may not provide benefits for any year until the minimum deductible for that year is satisfied. However, section 223(c)(2)(C) provides a safe harbor for the absence of a deductible for preventive care. Under section 223(c)(2)(C), “[a] plan shall not fail to be treated as a high deductible health plan by reason of failing to have a deductible for preventive care (within the meaning of section 1861 of the Social Security Act, except as otherwise provided by the Secretary).” Therefore, an HDHP may provide preventive care benefits without a deductible or, subject to any applicable requirements under section 2713 of the Public Health Service Act (PHS Act), with a deductible below the minimum annual deductible otherwise required by section 223(c)(2)(A). To be a preventive care benefit as defined for purposes of section 223, the benefit must either be described as preventive care for purposes of section 1861 of the Social Security Act (SSA) or be determined to be preventive care in guidance issued by the Department of the Treasury (Treasury Department) and the Internal Revenue Service (IRS).”

For PHSA section 2713, the [26 CFR Part 54](#) addresses Coverage of Certain Preventive Services Under the Affordable Care Act and provides a list of sources for preventative services, including, but not limited to, [“A” and “B” Recommendation from the United States Preventive Services Task Force \(USPSTF\)](#), [CDC](#), [HRSA](#), and a link to [Healthcare.gov’s preventative care benefits](#).

Oral Cancer screenings are addressed in the USPSTF guidelines. A review of the USPSTF guidelines for [oral cancer screenings](#) reveal the grade was change to “I.” This is [defined](#) as, in part, “...evidence is insufficient to assess the balance of benefits and harms of the service...”

Furthermore, plan rules, such as on the [Consumer Driven Health Plan](#) (hyperlink), the plan’s Preventive Care/Wellness Benefits explicitly identify “Preventive screening services are provided in accordance with national organizations, state, and federal laws: [United States Preventive Services Task Force \(USPSTF\) A & B Recommendations](#).” Because Oral Cancer Screenings are no longer an A or B recommendation, it is no longer a covered benefit.

Finally, the [Dental Master Plan Document](#), page 17, explicitly states “Medically Unnecessary Services or Supplies: As determined by PEBP or its designee not to be medically necessary (as defined in the Definitions section of this document.) This includes procedures that are not indicated due to insufficient evidence of efficacy, including, but not limited to, Adjunctive Pre-Diagnostic Tests, **Oral Cancer screenings**, etc.” (Emphasis added).

Based on the information you have provided; some claims may have been improperly processed. We have forwarded the information to our Third-Party Claims Administrator for review.

Thank you,

[REDACTED]

Quality Control
Public Employees' Benefits Program
3427 Goni Road, Suite 109
Carson City, NV 89706
(775) 684-7020

For more detailed information about your plan benefits, please visit the <https://pebp.state.nv.us/plans/plan-documents/> page of the PEBP website. You can also contact Member Services at 775-684-7000, option two or email memberservices@peb.nv.gov.

CONFIDENTIALITY STATEMENT:

This e-mail and any attachments are intended only for those to which it is addressed and may contain information which is privileged, confidential and prohibited from disclosure and unauthorized use under applicable law. If you are not the intended recipient of this e-mail, you are hereby notified that any use, dissemination, or copying of this e-mail or the information contained in this e-mail is strictly prohibited by the sender. If you have received this transmission in error, please return the material received to the sender and delete all copies from your system.

TL

--SecureDelivery--



JOE LOMBARDO
Governor



STATE OF NEVADA
PUBLIC EMPLOYEES' BENEFITS PROGRAM
3427 Goni Rd, Suite 109 | Carson City, Nevada 89706
Telephone 775-684-7000 | 702-486-3100 | 1-800-326-5496
www.pebp.state.nv.us

LAURA RICH
Executive Officer

JACK ROBB
Board Chair

Date: May 25, 2023
Item Number: X
Title: UMR Performance Guarantees Summary

SUMMARY

This report provides the PEBP Board and members of the public with supplemental information regarding CTI's audit of PEBP's Third-Party Administrator, UMR, and the performance guarantees that were not part of the Random Sample Audit results. The tables below illustrate additional penalties being assessed by PEBP for self-reported, unmet performance guarantees not captured in the second quarter audit for fiscal year 2023.

REPORT

Claims Administration

There are a total of nineteen (19) measurement categories of service and performance guarantees related to claims administration. In addition to any exceptions noted in the audited performance guarantees, there were six guarantees reported to be "Not Met" with penalties calculated against total fees of \$1,292,524.65:

Performance Guarantee	Result	Fees at Risk	Calculated Penalty
1.4 Claim Adjustment Processing Time	NOT MET	1.0%	\$12,925.25
1.5 (Customer Service) Telephone Service Factor	NOT MET	1.0%	\$12,925.25
1.6 Call Abandonment Rate	NOT MET	1.0%	\$12,925.25
1.7 First Call Resolution Rate	NOT MET	2.0%	\$25,850.49
1.8 Open Inquiry Closure (98.00% within 5 Business Days)	NOT MET	1.0%	\$12,925.25
1.9 CSR Audit	NOT MET	1.0%	\$12,925.25
Total		7.0%	\$90,476.73

1 Please unmute your mic and slowly state and spell your name
2 for the record.

3 MR. UNGER: Doug Unger, D-o-u-g U-n-g-e-r,
4 President UNLV Chapter, Nevada Faculty Alliance and Chair
5 Government Affairs Committee. Thank you to, Director Robb,
6 and, PEBP Board, for your service and consideration.

7 As we close the 2023 fiscal year and launch into
8 the new one, we would like to point out some serious issues
9 with UMR and its claim administration. As is clear in the
10 audit findings for Agenda Item Number 9, UMR failed to meet
11 service expectations in five key areas. UMR's administration
12 of patient claims has excessive errors and the medium and
13 meantime for claims turnaround are unsatisfactory.

14 The underperformance by UMR has led to real world
15 consequences for several faculty and university employees,
16 including unreasonable delays in resolving claims. In at
17 least one case, a letter sent by UMR to a UNLV employee
18 stating her claims and appeals have been resolved in her
19 favor and would be paid, only to find out that the claims
20 department at UMR persisted in informing health provider
21 billing offices that her claims had been denied, sending some
22 bills wrongly into collection and causing significant
23 personal anguish and frustration to the employees such that
24 she was on the verge of quitting her job.

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1 Another claim took no less than five months to
2 resolve. The faculty member caught in seemingly endless
3 telephone response loops until the former executive officer
4 intervened and resolved the matter. There are at least
5 another five or six such cases currently bouncing around the
6 UMR system. This poor and personal tone deaf service to PEBP
7 members cannot and should not happen.

8 We strongly request, as was in place with
9 HealthSCOPE, that PEBP worked with UMR to create a patient
10 advocate position that responds directly to members who are
11 having claims payment or approval issues and hope to resolve
12 them.

13 As well, UMR has recently cut Desert Radiology
14 from its in-network providers effective August 1st. This
15 decision will reduce access to diagnostic imaging services in
16 Southern Nevada for PEBP members by about 40 percent and is
17 already causing scheduling problems in a region, which has
18 been long underserved.

19 Furthermore, without an announcement of this
20 decision by UMR and explanation to PEBP members, there will
21 be mistakes in accessing in-network providers that will cost
22 state employees unnecessarily and lead to further
23 frustrations with PEBP.

24 In sum, I hope that PEBP staff and the Board can
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1 work aggressively with UMR and its parent company,
2 UnitedHealthcare to resolve these serious customer service
3 deficiencies. Thank you.

4 CHAIRMAN ROBB: Thank you. Duly noted. Do we
5 have any further public comment?

6 MR. HOPKINS: Yes, we do, Chair Robb. Caller
7 with the last four digits 6837, please slowly state and spell
8 your name for the record if you wish to make public comment.

9 MR. ERVIN: Hello. This is Kent Ervin,
10 E-r-v-i-n, past president of the Nevada Faculty Alliance.
11 Good morning, Chair Robb, Executive Director Glover and
12 committee members.

13 I would like to comment on how PEBP participants
14 fared during the legislative session. We did get partial
15 restoration of benefits, but there was more than enough
16 surplus money in the budget to fully restore PEBP benefits to
17 pre-pandemic levels as evidenced by the restoration of basic
18 life insurance and supplemental HSA/HRA contributions.

19 But when legislators ask how the fully restored
20 benefits, PEBP staff told them it was too late to make any
21 plan design changes for FY 2024 and offered no other
22 solutions. That was frankly contrary to the intent of the
23 PEBP Board, which had asked for full restoration to be
24 submitted as a budget option.

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From: [REDACTED]
To: [REDACTED]
Subject: Public Comment for 9-28 PEBP Board
Date: Tuesday, September 12, 2023 1:39:40 PM

Jessica,

I would like to submit the below general public comment for the upcoming PEBP Board Meeting.

Thank You,

Scott Carey

Dear PEBP Board,

As an individual member of the Program, I would like to provide a general public comment regarding the recent Vaccine Clinic hosted by the program in Carson City. Before the clinic I have heard from several of my colleagues that they were not able to register for this clinic as it filled up quickly. I hope that for future events the registration process can be improved so more members can take advantage of this benefit.

Despite using a third the party registration system I arrived at my appointment time and found a room full of other members waiting for their shots to be done a single technician. When I arrived, I was informed that the clinic did not any COVID or pneumonia shots available. I was also informed that they ran out of needles for the clinic. After waiting a half hour for more needles to arrive another technician arrived to deliver more shots. I would like to commend the PEBP staff who despite the circumstances were very friendly and courteous checking in the members. I wanted to provide these comments to Board to make you aware of how this clinic went. I hope for hope future vaccine clinics are ran better and that it is easier for members of the program to take advantage of this benefit.

Thank You,

Scott Carey
PEBP Member

<!--[if !supportAnnotations]--> <!--[endif]-->



From: Brad [REDACTED]
Sent: Tuesday, September 12, 2023 3:19 PM
To: [REDACTED]
Subject: This email is intended for the PEBP Director.

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I called PEBP and they would not give me an email address for the PEBP Director.

Once again this email is intended for the PEBP Director.

On August 23rd I booked an appointment for COVID-19 and flu vaccination through PEBP for September 12th. in Carson City. Shortly after I received an appointment confirmation from Safeway. I put my faith in PEBP and did not seek an appointment elsewhere.

This morning, September 12th I received 7 appointment confirmation emails from Safeway for today's appointment. I arrived at PEBP for my appointment and stood outside in the sun for close to 30 minutes before being informed there were no covid vaccines available.

Seems if they can send out 7 confirmations they could send one email advising there was no vaccine available and no need for me to drive into Carson. At some point someone knew covid vaccines were not going to happen.

This left me scrambling for another provider.

There is an old saying, "As the Captain, so goes the ship". Sir, your ship is not seaworthy.

Brad Valladon [REDACTED]

Date: September 21, 2023
To: PEBP
From: Tina Garza, State of Nevada Employee
Re: 100% Medical Premium for Employee

As an employee with the State of Nevada, that cannot afford the medical insurance offered by the state. I have elected no medical benefits, sadly I cannot afford the medical insurance premium.

I am professionally happy with my position with the State of Nevada, however, the same position with a City or County job has a higher compensation rate.

For PEBP to pay 100% medical premium would allow me access to medical coverage that everyone in the State of Nevada should have, especially a state employee.

This could be life changing for employees that do not have medical coverage.

September 21, 2023

To Members of PEBP Board,

My name is Sonja Whitten, I have been a State of Nevada employee for almost 20 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sonja Whitten', with a long horizontal flourish extending to the right.

Sonja Whitten

State of Nevada Employee

Austin Krehbiel

Family Services Specialist 1
Division of Welfare and Support Services
State of Nevada

Dear PEBP Board,

I am a relatively new state employee. [REDACTED] I have a lot of medical costs and my medical needs require me to have the best health insurance and care possible to manage my [REDACTED] [REDACTED] and afford my medication. I am writing to you today to request that the PEBP board cover 100% of the health insurance premium.

Before I worked for the State, I worked for MGM and for Nevada Partnership for Homeless Youth. Both nonprofit and private organizations were able to provide me similar or better health insurance with a lower premium amount. PEBP should be able to pay for state employees to have health insurance. It is a large burden to pay \$161/month every month on top of all of my prescriptions, co-pays, and out-of-pocket medical expenses.

Please assist all state employees and pay for 100% of the premium for state employees.

In Solidarity,
Austin Krehbiel

September 21, 2023

To Members of PEBP Board,

My name is Leah Young, I have been a State of Nevada employee for 6 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

A handwritten signature in cursive script that reads "Leah Young".

Leah Young

State of Nevada Employee

September 21, 2023

To Members of PEBP Board,

My name is Cynthia Luttig, I have been a State of Nevada employee for almost 10 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Cynthia Luttig

State of Nevada Employee

September 21, 2023

To Members of PEBP Board,

My name is **Jamlick**, I have been a State of Nevada employee for almost 1.5 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Jamlick Mwangi

State of Nevada Employee

September 21, 2023

To Members of PEBP Board,

My name is **Stephanie Dube**, I have been a State of Nevada employee for almost **7** years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Stephanie Dube
State of Nevada Employee

September 22, 2023

To Members of PEBP Board,

My name is Steven Ross, I have been a State of Nevada employee for almost 3.5 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Steven Ross

Steven Ross
State of Nevada Employee

September 21, 2023

To Members of PEBP Board,

My name is Kevin McDonald, and I have been a State of Nevada employee for almost 1 year. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State to retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Kevin McDonald
State of Nevada Employee

September 21, 2023

To Members of PEBP Board,

My name is **Jessica Owens**, I have been a State of Nevada employee for almost **1** years I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Jessica Owens

State of Nevada Employee

September 21, 2023

To Members of PEBP Board,

My name is Jevin Branner, I have been a State of Nevada employee for almost a year. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Jevin Branner
Compliance Investigator II
Nevada Insurance Division
3300 Sahara Ave, Suite 275
Las Vegas, NV 89102

Website: doi.nv.gov

September 21, 2023

To Members of PEBP Board,

My name is Cheryl Allen-Stallworth, I have been a State of Nevada employee for almost 6 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Cheryl Allen-Stallworth
State of Nevada Employee

September 22, 2023

To Members of PEBP Board,

My name is **Chantae Palacio**, I have been a State of Nevada employee for almost **4 months**. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Chantae Palacio
State of Nevada Employee

September 21, 2023

To Members of PEBP Board,

My name is **Doreatha Ross**, I have been a State of Nevada employee for almost **1** years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Doreatha J. Ross

State of Nevada Employee

My name is Blaine Harper. I am an active state employee and member in good standing of AFSCME Local 4041. I am providing this **statement in opposition** to the proposal to change the way PEBP allocates our premium costs for healthcare.

PEBP currently issues equal base subsidies across plans, with net subsidies of \$620.09 towards the employee, \$449.57 towards a spouse or domestic partner who is not eligible for insurance through their own employment, and \$168.59 towards a dependent child or children (source: plan rate comparison for active state employees in FY24, page 3 of https://pebp.state.nv.us/wp-content/uploads/2023/04/PY24_All-Rates.pdf). Current subsidies make the employee-only coverage level available at monthly premiums of \$46.96, \$68.14, or \$161.00. The difference in monthly premiums is a result of the disparity in pre-subsidy costs across the three health insurance options (respectively: \$652.46, \$685.44, and \$790.68).

The proposed change would disproportionately subsidize more expensive health coverage and would change the rationale by which employees choose their coverage, potentially drawing down PEBP's funds on subsidies at the employee-only level to an extent that may not be accurately estimated from employees' choices in FY24 and earlier. Consumer choice would operate without the information that identifies which plans provide the highest value for the cost and would lose responsibility to cost differences between plans and plan years. **The proposal therefore leaves PEBP funds vulnerable to inefficiency and exploitation.**

To make matters worse, the proposed change would be achieved by reducing subsidies that support active state employees with dependents. Immediately upon the adoption of the change, **employees covering dependents on the lower-cost plans would see monthly premiums rise**, not decrease. Health insurance benefits are important to employee retention. **The proposed change would make state employment less manageable for workers who need to support their families.**

The intention to provide a zero-dollar premium option for active state employees would be commendable, but **the proposed change is a dangerous zero-sum approach** that favors expensive plan options over existing allocations that provide coverage access for the dependents of active state employees. Employee-only subsidies in excess of the unsubsidized rate for the lowest-cost coverage option present a risk to both PEBP and the Nevadans who rely on it.

I extend my thanks to the Board for your diligence in managing PEBP coverage and funding.

Blaine Harper, Ph.D.
Staff Research Associate II, University of Nevada, Reno
AFSCME Local 4041

Hi.

PEBP should cover employee premiums 100%.

Thank you,

Casey Lee

September 21, 2023

To Members of PEBP Board,

My name is **Lisa Fulton**, I have been a State of Nevada employee for almost 6 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Name

State of Nevada Employee

September 25, 2023

To Members of PEBP Board,

My name is **Heather Garrett**, I have been a State of Nevada employee for almost 12 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,



Heather Garrett

State of Nevada Employee

September 21, 2023

To Members of PEBP Board,

My name is **Carol Zagalo**, I have been a State of Nevada employee for almost **12** years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Carol Zagalo
State of Nevada Employee

I would like to see PEBP pay 100% of the premium for employees, with the rising cost of food, utilities, housing and we as employees not seeing a raise for 2 years, besides a 1%, PEBP should pay for employees medical premiums. I have been with the state for 9 years.

To whom it may concern,

I am in support of PEBP paying for our health care premiums. This will help immensely with financial burdens that are already taking place.

Thank you for your time

September 25, 2023

To Members of PEBP Board,

My name is **Rhonda Kelly**, I have been a State of Nevada employee for almost 12 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State in retaining a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Rhonda Kelly
State of Nevada Employee

PEBP action

In response to a proposed plan to change policy of paying out 100% of employee cost and only then if funds are left contribute to the Spouse or family portions of the costs.

I oppose this plan I am a State of Nevada Employee with over 14 years with the state and I am also an active AFSME member. I have seen several changes To PEBP over the years. Although I have had my Son covered in the past he is over 26 and no longer eligible so I am now on employee only plan.

The only demographic this proposed change would help is the people on “employee only” plan. Although I am now in that category, I oppose this change because when I did need to cover my Son as a Single mother had the cost for him not been subsidized I would not have been able to afford insurance for my child. Insurance costs are already High. I cannot in good conscience support something that would increase the costs for Families of state employees that already struggle. While employees that are self only would have a cost savings Families facing this likely would have to start making choices about IF they can cover spouse or Family. Lowering Single employees guarantees everyone else WILL pay more and maybe much much more.

State employees often fall under the “I make to much money for assistance or other low cost options” so would likely see more people having to opt out of coverage completely and with more uninsured people in the population State costs in general will increase. For me personally having access to Medical benefits was a huge draw to state service and employment. Actions that make those benefits more difficult to afford for a majority of state employees is unreasonable. Recent Demographic information shows single person households in Nevada to be only around 25%* Meaning about 75% are NOT single member households. As state employees we are Nevada Residents also so those #'s although not exact do indicate that a majority of State employees are probably NOT single households either. Changes in funding benefits that only benefit a smaller portion and hurt a larger portion than they help are not appropriate.

The reason I oppose this plan is because while it may be good for Single state employees in the short run it will hurt all employees I the long run if insurance costs sike to point that more people will have to stop working for state or stop having medical insurance because they cannot afford it. One of the largest issues reported in every state department is short staffing or not being able to hire people to work for the state. We do not need to limit one of the few real benefits of state service.

*Demographic information pulled from census data and is averaged. single households were listed at 22% to 26.5% across varied sources for recent years.

Trish Lindauer

IT tech 4 State of Nevada at DWSS, AFSCME Board Member/Treasurer Sierra Range Chapter.

I make these statements on my own accord as my own opinion and not on behalf of my Agency.

My name is Brian Miller. I am a Carpenter at UNR. I am a proud member of AFSCME 4041.

I wish to state that health insurance dwindled into a nightmare.

I cannot consent to abide by any proposal that advocates wholly for the individual.

I have not only raised a family in this State, but also a career.

Life is not about me. I have seen many people hurt by what the state and every other entity coming forward wish to propose what works best.

I am not the most intelligent person by any means. I do remember when I applied for the State of Nevada. I knew 23 years ago that no matter if I was single, or a single dad, or a married man with several dependents, I would have good insurance.

That has not been the case for over a decade! I have seen so much drama happen over this topic. I have seen too many workers leave over what could be and should be settled, not over a PEBP board, but by the workers of this State of Nevada.

I can't stand for any plan that advocates wholly for the individual employee.

PEBP is a faction of the State of Nevada. What happened to make it better for everyone?

Like so many others I stood by and focused on just getting by and making sure I had coverage for myself and my family. Health insurance should never cater to one aspect of life or the other.

I have many health issues that I could look into if I had full coverage. I also have kids and a wife who depends on me for coverage. On paper to cover myself looks good. I am a dad, I am a husband and I cannot advocate for any idea or plan that punishes people for taking a risk outside of themselves.

Make PEBP what it once was. We are losing workers, friends, and family each day over what?

I do not have the answers. I know it was not always this way. Do what is best for ALL of the state workers.

Brian Miller



TO: Jack Robb, Chair, and Public Employee Benefits Program Board

FROM: Douglas Unger, President, UNLV Chapter, and Chair, Government Affairs Committee, Nevada Faculty Alliance; & Member, UNLV Employee Benefits Advisory Committee

E-mail: [REDACTED] Ph: [REDACTED]

PEBP BOARD MEETING – 9-29-2023 -- PUBLIC COMMENT

Doug Unger, President, UNLV Chapter, Nevada Faculty Alliance, and Chair, Government Affairs Committee. Thank you to Director Robb and the PEBP Board for your service and consideration.

First, we would like to thank the executive leadership of UMR for their outreach to set a meeting in late August with UNLV and NFA representatives after Public Comments in July. We believe our conversation is leading to improvements in communications between PEBP members and UMR plus increased support services, which are most welcome. We are continuing to work toward further improvements also through our own efforts to educate our PEBP members about how better to address billing and provider issues. Thanks to UMR for this constructive response.

Regarding today's agenda, we hope PEBP leadership and the PEBP Board will be able to leave plan benefits as intact and stable as possible for the next fiscal year. We note many Public Comments from state employees requesting a plan adjustment for 0% premiums for the covered employee. Informal consultations with our UNLV colleagues indicate that we also support this change but only if funds can be found to continue to subsidize dependent insurance costs at current levels. Without the current dependent subsidies, we believe state employees with children and partners will be forced to shoulder much higher costs, which could be too burdensome.

Finally, we wish to offer our warmest wishes to Interim Executive Officer Celestina Glover and to her application for the permanent position. She is very experienced, knows PEBP inside and out, and we look forward to working with her in the coming year, hopefully including the regular PEBP advocacy group check-ins and meetings that vastly improve member communications.

Thank you all once again for your service, and for your thoughtful work on the PEBP Board.

September 26, 2023

To Members of PEBP Board,

My name is Gina Ringwalt. I have been a State of Nevada employee for almost 17 years. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

Thank you to members of the PEBP Board for taking this item into consideration and it is my hope this will be approved.

Thank you for taking the time to review my public comment.

Sincerely,

Gina Ringwalt
State of Nevada Employee

My name is Steven Fernandes, I work as a Custodial 1 employee for the state of Nevada within NSHE at the CSN Henderson campus. I am a member of AFSCME Local 4041.

- I am against the proposal to change the way PEBP allocates funds. At a time when PEBP does not have reserves to work with, the proposal to cover 100% of monthly premiums at the level of the employee would take money from the pockets of state workers who count on their coverage to keep their families healthy.
- We cannot afford to lose state employees who would need to take a different job to support their families.
- I request that any proposed changes to subsidy allocations be considered with attention to their consequences for families and for the strength of the workforce that keeps the State of Nevada running.

A increase in cost would put myself and other workers within my department at great jeopardy financially speaking.

Respectfully,

Steven Fernandes
Custodial 1
CSN Henderson NV
Member of AFSCME local 4041

September 26, 2023

To Members of PEBP Board,

My name is Jordan Galloway, I have been a State of Nevada employee for 1 year. I am providing this statement in support of the proposal to change the way PEBP allocates our premium costs for healthcare. I am in support of PEBP paying 100% of employees' premium and any remaining funds can be used by the employee to go towards costs for additional dependents.

Healthcare is very important to a lot of State Employees, and I firmly believe this action by PEBP will assist the State retain a qualified and healthy workforce.

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Thank you for taking the time to review my public comment.

Sincerely,

Jordan Galloway
State of Nevada Employee