

Kari Armijo, Secretary Alex Castillo Smith, Deputy Secretary Kathy Slater Huff, Deputy Secretary Kyra Ochoa, Deputy Secretary Dana Flannery, Medicaid Director

HCAF BULLETIN 2025-002

JUNE 5, 2025

TO: HEALTH INSURANCE ISSUERS SELLING HEALTH BENEFIT PLANS IN THE SMALL GROUP MARKET THAT MEET QHP STANDARDS

RE: SMALL BUSINESS HEALTH INSURANCE PREMIUM RELIEF INITIATIVE PREMIUM REDUCTION PERCENTAGE FOR COVERAGE ACTIVE JULY 1, 2025, UNTIL DECEMBER 31, 2025; PAYMENT TIMELINE AND RECONCILIATION FOR THE 2025 PROGRAM YEAR

THIS BULLETIN is issued pursuant to NMSA 1978, Section 59A-23F-11, which established the Health Care Affordability Fund to "reduce premiums for small businesses and their employees." This Bulletin sets forth program parameters, requirements for issuers, and the Health Care Authority's (HCA's) responsibilities under the Small Business Health Insurance Premium Relief Initiative. This program was previously administered by the New Mexico Office of Superintendent of Insurance.

Premium Reduction Percentage

All issuers subject to this Bulletin must reduce premium charges to small group Qualified Health Plan (QHP) purchasers by the credit amount of 10% for all Bronze and Silver plans and 15% for all Gold and Platinum plans active on July 1, 2025. The Premium Reduction Credit described in this bulletin will be effective from July 1, 2025, through December 31, 2025. This period will be referred to as "the second half of the 2025 Program Year." The premium reduction shall be applied by providing a credit for coverage in the invoice to small group QHP purchasers following the applicable coverage month.

In order to provide operational flexibility, issuers are permitted to begin applying increased credits for Gold and Platinum plans starting on the September invoice, provided that all purchasers will continue to receive a premium reduction credit of no less than 10% across all metal levels until the 15% premium credit can be applied monthly to the Gold and Platinum plans. If an issuer opts to begin applying the increased Gold and Platinum credits on the September invoice, the issuer must notify HCA by June 13 and include any credits owed to small group purchasers for August invoices (the July coverage month) on September invoices (August coverage month).



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Monthly Issuer Reporting

Issuers must submit data to HCA monthly to receive payment for the discount/credit provided, no later than the third business day following each applicable coverage month, using the secure online data-sharing portal provided to the issuer's primary contact by HCA. Issuers must submit to HCA:

- 1. A completed version of the Monthly Reporting Template as posted on the Initiative's webpage: https://www.hca.nm.gov/small-business-health-insurance-premium-relief/.
- 2. An invoice specifying the amounts owed by HCA for the applicable coverage month. This invoice should include the date, the issuer's contact information, a unique invoice number, and a note that the invoice is related to the New Mexico Small Business Health Insurance Premium Relief Initiative.

Issuers should not report retroactive adjustments/restatements from previous months on this template. These adjustments/restatements will be handled during the annual reconciliation period.

If an issuer opts to begin applying the increased Gold and Platinum credits on September invoices, the issuer may leave the Metal Tier tab in the reporting template blank for the July coverage month. The July coverage month template should be resubmitted in September so that HCA can make the adjusted payments for July.

Monthly Payments to Issuers

Upon verification of the submitted data and invoice described above, HCA will issue monthly electronic payments. TABLE 1 shows the reporting and payment deadlines for the 2025 Program Year.



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TABLE 1: Monthly Reporting and Payment Deadlines for the 2025 Program Year

Coverage Month	Issuer Reporting Deadline	HCA Payment Target
January 2025	February 5, 2025	February 28, 2025
February 2025	March 5, 2025	March 31, 2025
March 2025	April 3, 2025	April 30, 2025
April 2025	May 5, 2025	May 30, 2025
May 2025	June 4, 2025	June 30, 2025
June 2025	July 3, 2025	July 31, 2025
July 2025	August 5, 2025	August 29, 2025
August 2025	September 3, 2025	September 30, 2025
September 2025	October 3, 2025	October 31, 2025
October 2025	November 5, 2025	November 28, 2025
November 2025	December 3, 2025	December 31, 2025
December 2025	January 5, 2026	January 30, 2026

Annual Issuer Reporting and Reconciliation

By March 2, 2026, all issuers subject to this Bulletin must submit the following documents to HCA using the secure online data-sharing portal provided to the issuer's primary contact:

- 1. A completed version of the Annual Reporting Template can be found on the Initiative's webpage: https://www.hca.nm.gov/small-business-health-insurance-premium-relief/.
- 2. An attestation to the accuracy of the submission, signed by a senior executive. No later than May 4, 2026, HCA will inform issuers of reconciliation amounts. All reconciliation amounts owed to HCA, or the issuer, shall be included in the issuer's invoice submitted during June 2026. If an issuer wishes to dispute reconciliation amounts after HCA notification, it must submit the dispute to deanna.stock@hca.nm.gov no later than May 18, 2026.

TABLE 2: Reconciliation Deadlines

Reconciliation Activity	Deadline
Submission of Annual Data	March 2, 2026
HCA Notice of Reconciliation Amounts	May 4, 2026
Submission of Reconciliation Disputes	May 18, 2026
Reconciliation Payments Due	June 30, 2026



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Small Business Notification

All issuers subject to this Bulletin must notify small group QHP purchasers of the premium reduction credit. All letters must be approved by HCA unless the language required in this Bulletin is inserted into a letter format that was previously approved.

Option 1: The following language must be sent to all active small groups prior to July 1, 2025 if an issuer opts to begin implementation of the increased discount for Gold and Platinum plans for **August invoices.** A version of this letter should also be included in enrollment packets for all new groups that enroll after July 1, 2025.

During the 2021 legislative session, the New Mexico Legislature worked with Governor Michelle Lujan Grisham to pass a law establishing a Health Care Affordability Fund, and as of July 2024, the programs were transferred to the New Mexico Health Care Authority. Under the law, the Health Care Authority is responsible for reducing health insurance premiums for small businesses. The Legislature has appropriated additional funding for FY 2026 allowing for additional premium reductions for certain plans. Under the program, you will receive credit on your invoice that reduces your premium by 10% for Bronze and Silver plans and 15% for Gold and Platinum plans. This premium reduction is part of the Health Care Authority's Small Business Health Insurance Premium Relief Initiative.

If you have employees enrolled in Gold or Platinum plans, you will receive the additional discount for the month of July on your August 2025 invoice. You do not need to take any action to receive this credit.

These discounts have been authorized for the coverage period between July and December of 2025. Please note that the Initiative is subject to legislative appropriation, and the reduction percentage could change from year to year. Should the reduction percentage change, [ISSUER NAME] will notify you in advance. If you have any questions about the Initiative, please visit https://bit.ly/3BwRSCE.

Option 2: The following language must be sent to all active small groups prior to July 1, 2025 if an issuer opts to begin implementation of the increased discount for Gold and Platinum plans for **September invoices**. A version of this letter should also be included in enrollment packets for all new groups that enroll after July 1, 2025.



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If you have employees enrolled in Gold or Platinum plans, you will receive the additional discount for the months of July and August on your September 2025 invoice. You do not need to take any action to receive this credit.

These discounts have been authorized for the coverage period between July and December of 2025. Please note that the Initiative is subject to legislative appropriation, and the reduction percentage could change from year to year. Should the reduction percentage change, [ISSUER NAME] will notify you in advance. If you have any questions about the Initiative, please visit https://bit.ly/3BwRSCE.

Advertising of Discounted/Credited Premiums

To ensure transparency, any advertising materials that display premiums at the discounted/credited price must make clear that the discount/credit is applied to the premium and results from New Mexico's Small Business Health Insurance Premium Relief Initiative. The materials should also provide a link to HCA's Small Business Initiative webpage and the HCA Office of the Secretary's phone number. All marketing materials, including those that reference the small business premium discount, must be approved by the Office of Superintendent of Insurance. Please direct any questions regarding this Bulletin to DeAnna Stock at 505-695-8496, or via e-mail at HCAFcomments@hca.nm.gov.

ISSUED this 05 day of June 2025.