Public Employees' Benefits Program

Biennial Compliance Review

Summary of Findings

November 2026

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Segal

Executive Summary

- **Scope:** Segal reviewed selected PEBP plan documents and administrative processes for compliance with federal and Nevada tax and employee-benefit requirements for the July 1, 2026–June 30, 2027 plan year.
- **Required notices:** Update and clarify key federal notices, including the July 2026 CHIPRA model notice, access to Qualified Medical Child Support Order procedures, and any notices applicable to disease-management programs.
- **Document alignment:** Reconcile inconsistencies among plan documents, Master Plan Documents, and Summaries of Benefits and Coverage, particularly for vision benefits, maternity benefits for dependent daughters, and physician references.
- **Key federal compliance requirements:** Consider removing the age-22 limit on autism treatment, exempt emergency inter-facility air ambulance transfers from prior authorization and clarify coverage of routine patient costs for qualifying clinical trials for life threatening conditions.
- **Key Nevada requirements:** Clarify coverage for audio-only behavioral-health telehealth and for prevention, testing, treatment, medications, and maternity-related services involving HIV, hepatitis C, and sexually transmitted diseases.
- **Prescription-drug protections:** Clarify coverage for certain substance-use-disorder medications. Address cancer step-therapy exemption procedures, emergency prescription access procedures during disaster declaration, procedures for synchronized refill of chronic medications, and early refills of covered topical ophthalmic products.
- **Priority action:** Update and align plan language, notices, and administrative procedures to reduce compliance risk and accurately reflect current federal guidance and Nevada law.

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