

| SIGNIFICANT MARKETPLACE FEDERAL CHANGES | BRIEF SUMMARY | EFF. DATE | SOURCE | IMPACT LEVEL |
|---|---|------------------|-----------------------------------|---------------------|
| Enhanced Advanced Premium Tax Credit (APTC) Expiration | Premium tax credits were increased for five years via ARPA and IRA. The additional credits expire at the end of 2025, returning APTCs to baseline ACA levels. | 1-Jan-26 | Lack of extension | Highest |
| End APTC for “5-year bar” customers under 100% FPL | Eliminates a rule that allowed APTCs for those with incomes under 100% FPL, if they were denied Medicaid due to the “five-year bar” for recent immigrants. | 1-Jan-26 | HR 1 | High |
| Unlimited Recapture of APTCs | People who received excess APTCs must pay it all back on their tax return. The payback amounts were previously capped for households making less than 400% FPL. | 1-Jan-26 | HR 1 | Med |
| Income-based Special Enrollment Period (SEP) Restriction | Ends APTC eligibility for individuals using an income-based SEP (such as the under 150% FPL SEP). Additionally, this SEP is paused through Dec. 2026 by the Marketplace Integrity Rule. | 1-Jan-26 | HR 1 / Marketplace Integrity Rule | Med |
| Eliminate APTC for some legal immigration statuses | Establishes new, reduced designation of “Eligible Alien” for APTC eligibility. Limited to lawful permanent residents, Haitian/Cuban entrants, and COFA immigrants. Refugees, asylees, visa holders etc. no longer eligible for APTCs. | 1-Jan-27 | HR 1 | High |
| No APTC if Termed from MA Due to Work Requirements | Blocks APTCs for individuals following a Medicaid denial due to work requirements. | 1-Jan-27 | HR 1 | Med |
| Shortening Open Enrollment Period (OEP) | OEP must end 12/31 instead of 1/15 (FFM) or 1/31 (HSRI), which may lead to challenges for customers, fewer enrollees, a sicker risk pool, and operational impacts on the contact center. | 1-Jan-27 | Marketplace Integrity Rule | Med |
| Pre-Enrollment Verification | Customers required to verify APTC eligibility criteria before they can enroll, rather than completing enrollment and payment based on “conditional eligibility” and providing documents afterward. | 1-Jan-28 | HR 1 | High |

KEY PROMPTS FOR ADVISORY GROUP

- What should we consider for a potential safety net when this change takes effect?
- How could we leverage community assets or build capacity to navigate the change?
- What other creative budget savings or revenue generating ideas should we consider together?
- Which populations or communities must we prioritize for potential supports and outreach?
- What other system, technology, people, or process changes should we consider?

Appendix: Lower Impact Changes

| LOWER IMPACT MARKETPLACE FEDERAL CHANGES | BRIEF SUMMARY | EFF. DATE | SOURCE | IMPACT LEVEL |
|--|--|---|----------------------------|-------------------------|
| Income Verification When Tax Data Is Unavailable | Prohibits allowing an attestation to verify income in the case that IRS does not return data on income and family size. | 25-Aug-25 <i>(Sunsets Dec. 2026)</i> | Marketplace Integrity Rule | Med <i>(stayed*)</i> |
| Income Verification for Applicants Attesting To Discrepant Income Over 100% FPL | If a customer attests to income qualifying for APTCs but external data sources indicate significantly lower income, customer must verify. | 25-Aug-25 <i>(Sunsets Dec. 2026)</i> | Marketplace Integrity Rule | Med <i>(stayed*)</i> |
| Requirement To File and Reconcile Tax Credits Annually | Prohibits APTC eligibility if the customer hasn't filed and reconciled taxes for the relevant year (reduced from two prior years to one). | 1-Jan-26 <i>(Sunsets Dec. 2026)</i> | Marketplace Integrity Rule | Med <i>(stayed*)</i> |
| Remove Fixed-Dollar, Gross-Percentage Premium Thresholds | Eliminates issuer flexibility to consider gross payment or fixed-dollar payment policies when considering if enrollees have paid sufficient premium amounts to enroll. | 25-Aug-25 <i>(Sunsets Dec. 2026)</i> | Marketplace Integrity Rule | Low |
| No APTC For Deferred Action for Childhood Arrivals (DACA) | When qualifying for PTCs or CSRs, lawfully present does not include DACA recipients. | 25-Aug-25 | Marketplace Integrity Rule | Low |
| Remove the 60-Day Extension to Resolve Income Inconsistencies | Eliminates the 60-day extension provided to resolve income inconsistencies. | 25-Aug-25 | Marketplace Integrity Rule | Low |
| Health Savings Account (HSA) Eligibility for Bronze Plans | Treats individual market bronze and catastrophic plans as an HSA-qualified high-deductible health plan (HDHP) that can be paired with an HSA. | 1-Jan-26 | HR 1 | Low |
| Updated Premium Adjustment Percentage Methodology | Changes the premium adjustment percentage methodology back to one that results in lower assistance and higher costs. Exacerbates impact of enhanced APTC expiration. | 1-Jan-26 | Marketplace Integrity Rule | Low |
| Expanded De Minimis Ranges for Actuarial Value (AV) To Permit Less Generous Plans | Expands the ranges of permissible AVs a plan may have to satisfy the AV requirements for metal levels and cost-sharing reduction variants. | 1-Jan-26 | Marketplace Integrity Rule | Low <i>(stayed*)</i> |

*Stayed by a court decision in *City of Columbus v. Kennedy*. Marketplaces must hold on implementing these changes while the court case continues.