



Commonwealth of Virginia

Federal Impacts on Virginia Marketplace Eligibility and Enrollment

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Virginia Health Benefit Exchange

September 16, 2025

Federal Changes Timeline 2025

June

CMS Marketplace Integrity & Affordability Rule finalized

July

HR 1 (DBBBA) passed and signed
City of Columbus vs. Kennedy filed
California vs. Kennedy filed

August

4th District Court preliminary injunction
Admin Appeal of Stay 1- provision only

September

CMS issues Guidance that Plan Year 2026 stays are in effect until further Court Action

June 25 and ongoing- Federal sub regulatory guidance and administrative actions

2026 Policy Changes

Provisions	New Policy
Eligibility limitations	Eliminates the monthly low-income Special Enrollment Period (<150% FPL). [*] Rescinds eligibility for DACA recipients. [*]
SEP limitation	Prohibits federal subsidies for income-based SEPs. ^{**}
Increased costs and payments	Increased maximum out-of-pocket limits by 15%. [*] Ends Advance Premium Tax Credit repayment caps. [*]
Expiration of expanded premium tax credits	Expected contribution towards premiums will increase for all marketplace enrollees and enrollees with incomes over 400% FPL become ineligible for PTC. ^{**} , ^{***}
Low coverage expansion	Expands eligibility for catastrophic plans. ^{****}
Provisions Stayed by Federal Court	
Coverage denials for past due premiums	Allows carriers to require past due premiums before effectuating new coverage. [*]
Increased verifications (2)	More income verification protocols for individuals with income mismatches. [*]
Limits access to PTC	Individuals who have failed to file and reconcile taxes for one year are ineligible for premium tax credits. [*]
Wider actuarial value ranges	Authorizes decreased value of bronze, silver, gold, and platinum plans. [*]

Policy Changes effective 2027/2028

Provision	Implementation Date	New Policy
Shortened Open Enrollment Periods	1/1/2027	Shortens the Open Enrollment Period to Nov. 1 - Dec. 31.
Ends financial assistance for some lawfully present immigrants	1/1/2027	Lawful permanent residents, Cuban and Haitian Immigrants, and COFA entrants will be QHP eligible, but ineligible for PTC/CSR due to immigration status.
Eliminates financial assistance for individuals failing to meet Medicaid work requirements	1/1/2027	Individuals failing to meet Medicaid work requirements are ineligible for premium tax credits.
Ends Automatic Re-Enrollment	1/1/2028	Requires Marketplace enrollees information to be actively verified each year prior to receiving APTC.

IRS Applicable Percentages

Income as % of FPL	Premium Contribution Percentage 2025	Premium Contribution Percentage 2026
<133% FPL	0%	2.1%
133-150%	0%	3.14% – 4.19%
150-200%	0.0 – 2.0%	4.19% – 6.6%
200-250%	2.0 – 4.0%	6.6% – 8.44%
250-300%	4.0 – 6.0%	8.44% – 9.96%
300-400%	6.0 – 8.5%	9.96%
400%+	8.5%	Unlimited

Cost and Enrollment Impacts of Expiring ePTCs

Based on 2025 rates

Income by FPL	Total Enrolled Households	Average Household Income	2025 Average Household Premium	2026 Estimated Average Household Premium	2025 Average Net Household Premium	2026 Estimated Average Net Household Premium	2026 Estimated Average Net Household Premium
100-133%	31,694	\$20,362.00	\$668.00	\$792.00	\$27.00	+\$36.00	\$63.00
133-150%	44,394	\$27,703.00	\$652.00	\$792.00	\$28.00	+\$72.00	\$100.00
150-200%	51,571	\$34,215.00	\$682.00	\$792.00	\$59.00	+\$119.00	\$178.00
200-250%	29,942	\$47,384.00	\$816.00	\$997.00	\$126.00	+\$182.00	\$308.00
250-300%	19,312	\$56,324.00	\$845.00	\$997.00	\$219.00	+\$208.00	\$427.00
300-400%	16,965	\$71,234.00	\$949.00	\$1,140.00	\$401.00	+\$235.00	\$636.00
>400%	9,179	\$110,410.00	\$1,199.00	\$1,440.00	\$748.00	+\$692.00	\$1440.00

Projected Premium Increases by Region

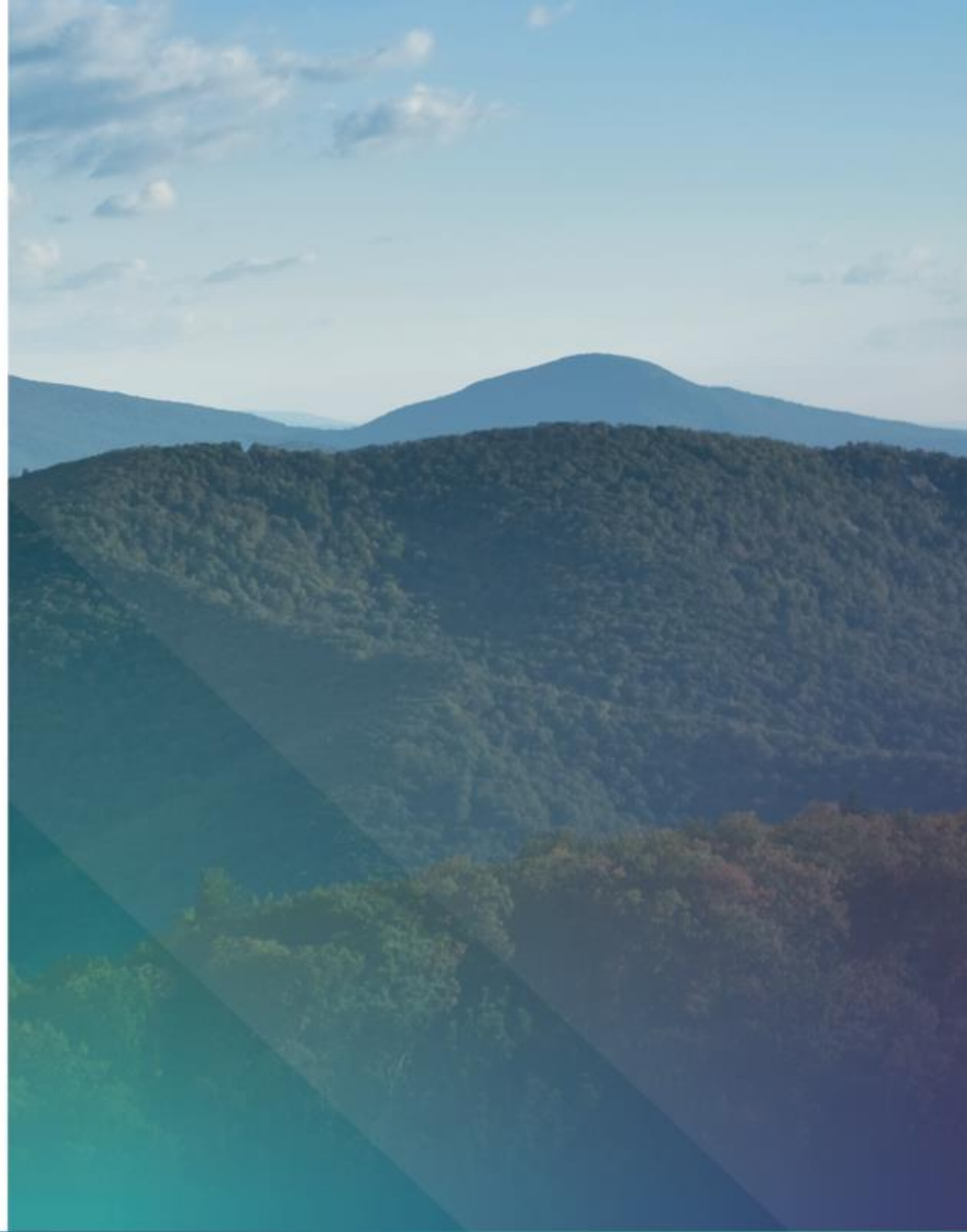
(Based on 2025 rates)

These counties have high enrollment of Virginians, and particularly high enrollment at 400% FPL and above.



	2025 Enrollment	2026 Projected Premium Increase
Henrico County		
< 400% FPL	12,879	\$76 - \$87
> 400% FPL	845	\$644 - \$739
Virginia Beach City		
< 400% FPL	14,788	\$63 - \$73
> 400% FPL	1,039	\$628 - \$719
Fairfax County		
< 400% FPL	48,506	\$90 - \$103
> 400% FPL	2,552	\$671 - \$769
Roanoke County		
< 400% FPL	3,302	\$90 - \$103
> 400% FPL	350	\$727 - \$834

Enrollment Impacts

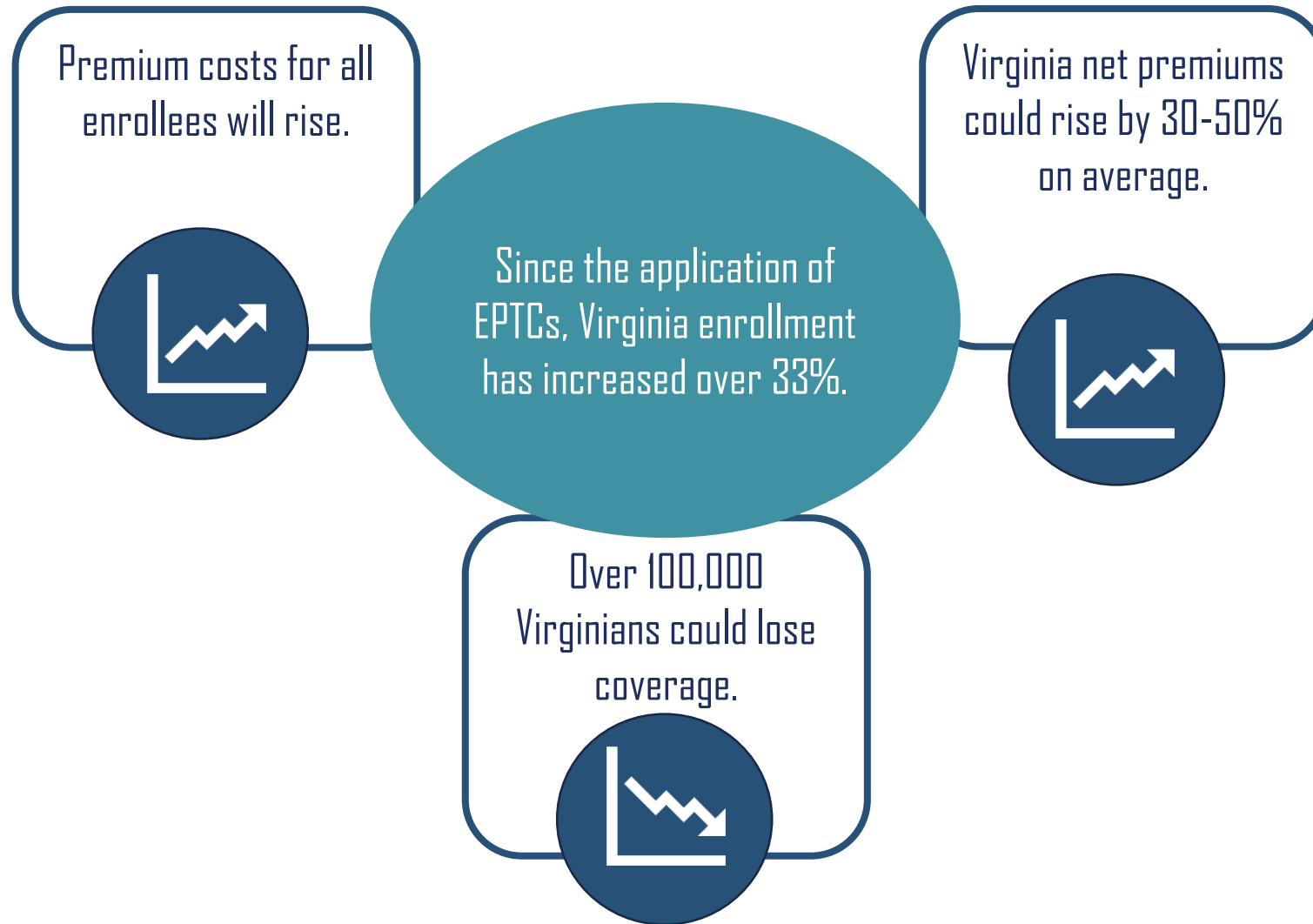


Impact of Expiring ePTCs: Consumers At Risk

Marketplace enrollment increased the most at the lowest and highest income levels of eligibility since ePTCs became available in 2021.

Income	Enrollment Increase by Household	Enrollment Increase as Percentage
100-150% FPL	45,109	82%
151-200% FPL	13,146	21%
201-250% FPL	3,463	7%
251-300% FPL	5,271	17%
301-400% FPL	2,923	9%
400%FPL+	42,458	419%

Expiration of Expanded Premium Tax Credits



Cost of Expiring Portion of PTCs

FPL%	Total Enrolled Households	Average Household Income	Initial 2026 Estimated Premium	Average 2025 Net Monthly Premium	Annual Cost to Cover Expired Portion of PTCs
100-133	31,694	\$20,362	\$792	\$27	\$6,325,615
133-150	44,394	\$27,703	\$792	\$28	\$13,248,306
150-200	51,571	\$34,215	\$792	\$59	\$20,536,479
200-250	29,942	\$47,384	\$997	\$126	\$16,478,400
250-300	19,312	\$56,324	\$997	\$219	\$10,258,565
300-400	16,965	\$71,234	\$1140	\$401	\$9,190,415
>400	9,179	\$110,410	\$1140	\$748	\$158,613,120
Total					\$234,650,902

Options to Consider

- Reconsider reinsurance parameters
- Provide direct funding to reduce premiums and cost sharing for Marketplace plans.
 - Maryland, Connecticut, California, Vermont, Colorado, New Jersey, New York, New Mexico, Washington, Pennsylvania (for PY 2026)
- Provide a state-based health plan for low-income consumers
 - Oregon, New York, Minnesota, Washington, Colorado. States considering: Maine, Minnesota, New Mexico

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