



Commonwealth of Virginia

Virginia Marketplace Eligibility and Enrollment Updates

Keven Patchett- Executive Director

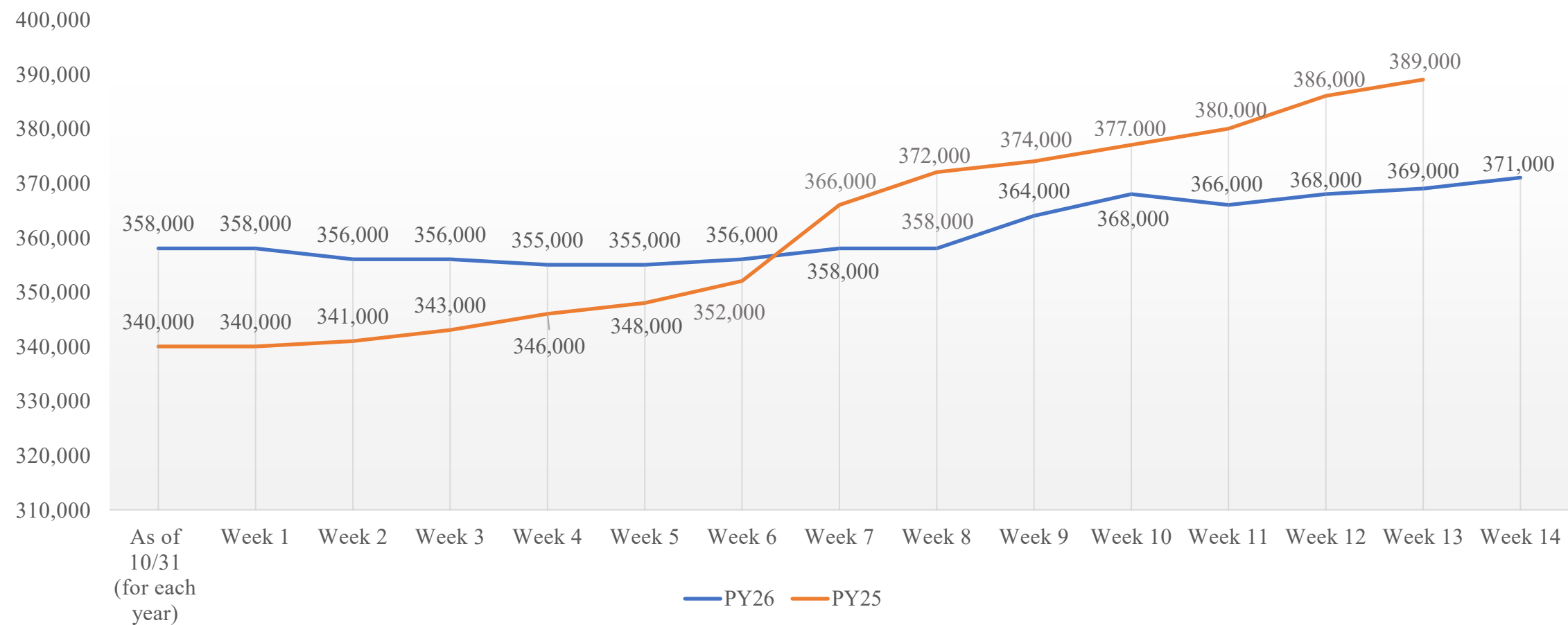
Virginia Health Benefit Exchange

September 23, 2026

Regulatory and Policy Landscape

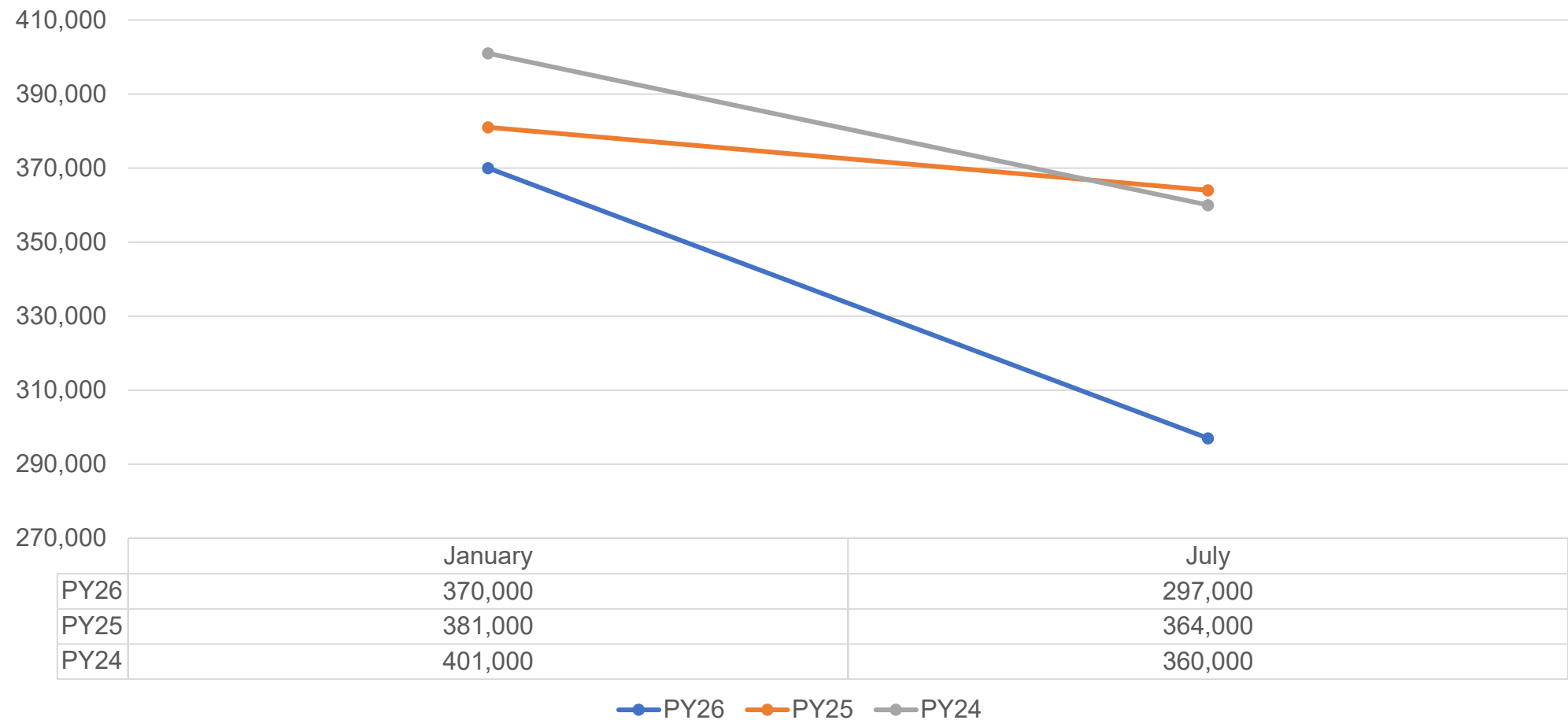
- Plan Year 2026
 - Expiration of Enhanced Premium Tax Credits
 - Loss of APTC for legal immigrants under 100% FPL (H.R. 1)
 - CMS Marketplace and Program Integrity Rule; Legal challenges
- Plan Year 2027+
 - PY 27 Premium Pressures
 - H.R. 1 – Marketplace & Medicaid Changes
 - CMS 2027 Notice of Benefit and Payment Parameters; Legal challenges
 - Other CMS initiatives
 - Virginia Premium Savings Program

Weekly OE Total Enrollment Data, PY25 & PY26



Note: Weekly enrollment data through 1/22/2025 (PY25) and 1/30/26 (PY26); rounded up to the nearest thousand.

Enrollment Changes for Plan Years 2024 - 2026



Enrollment Changes:

Plan Years 2024-2026

	Enrollment at the end of OEP	Enrollment as of early July	% Change
2026	370,000	297,000	-19.73%
2025	387,000	364,000	-5.94%
2024	401,000	360,000	-10.22%

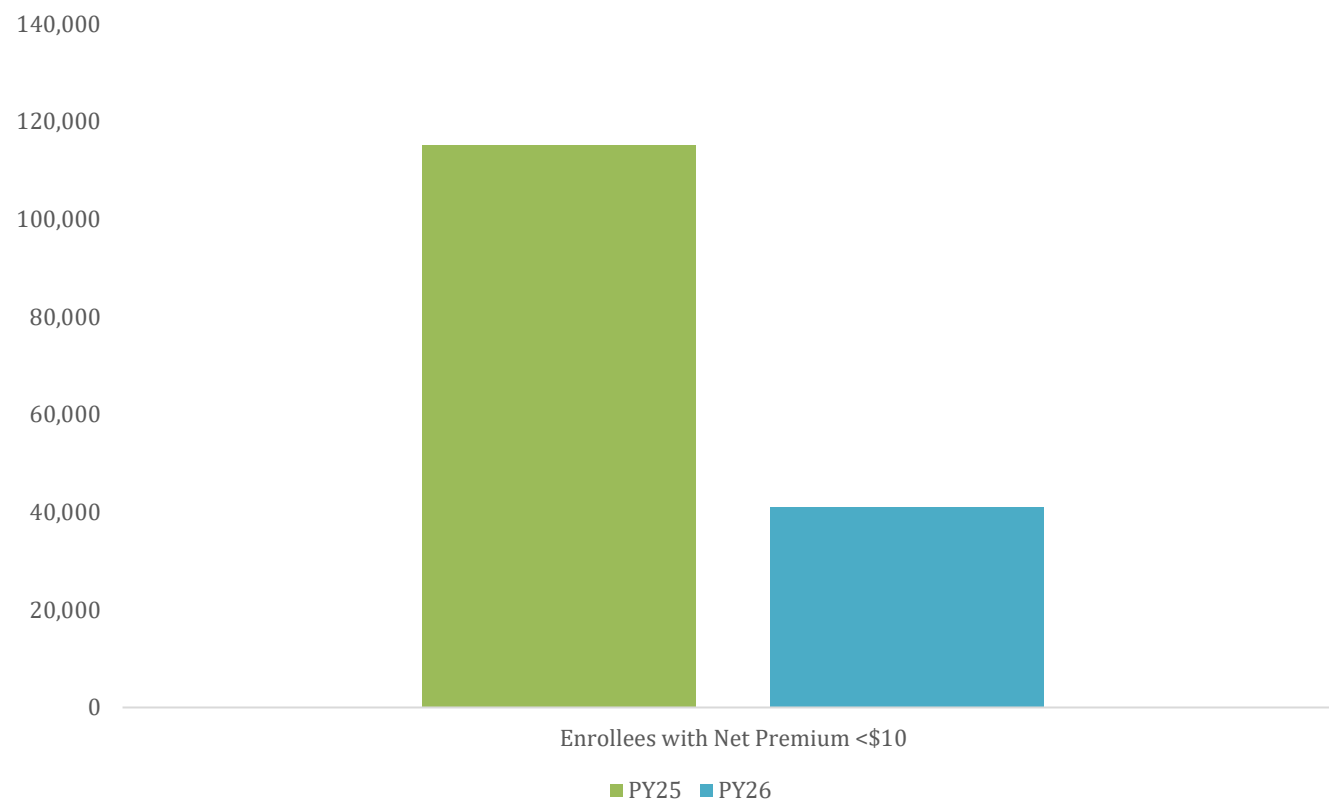
Metal Level Enrollment

PY25, PY26 OE, PY26 July 2026

	Catastrophic	Bronze	Silver	Gold	Platinum	Total
PY25 End of OE	1,700	147,900	133,900	101,500	3,800	388,800
% of Total	<1%	38%	34%	26%	1%	
PY26 End of OE	3,200	156,700	115,300	9,3500	1,400	370,100
% of Total	1%	42%	31%	25%	<1%	
PY26 As of July 2026	1,200	112,900	93,800	86,500	3,000	297,600
% of Total	<1%	38%	32%	29%	1%	

Plan Selections with Net Premiums <\$10 PY25-PY26

11% of enrollments with a net premium of \$10 or less for PY 26, compared to 30% in PY25.



Launching Virginia Premium Savings: PY2027

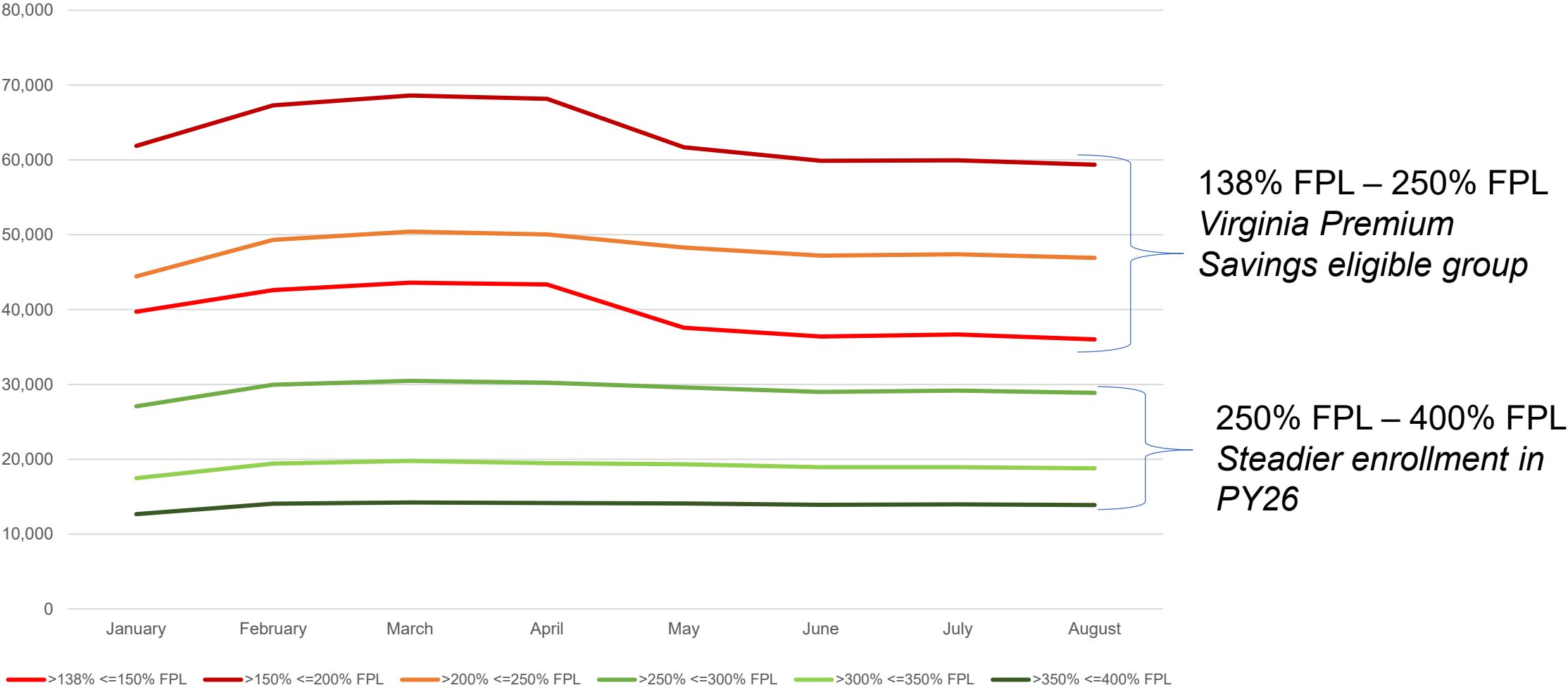
Virginia Biennial Budget signed by Gov. Spanberger- June 29

- Creates Health Care Affordability Fund
- Provides \$150M in state funding for premium assistance
- Applies to households earning between 138%-250% FPL
- Targets 70% reduction in premium - after federal APTC
- Benefits as many as ~200,000 Virginians

Terminations By Income

Income as % of Federal Poverty Level	November 2025 – June 2026	2026 % of total
< 100	14,500	12%
100 - 138	25,300	20%
138 - 150	15,700	13%
150 - 200	22,900	18%
200 - 250	13,300	11%
250 - 300	7,500	6%
300 - 350	4,400	4%
350 - 400	2,600	2%
> 400	7,300	6%
Unknown	9,400	8%
Total	122,900	100%

PY26 Enrollment Trends by FPL



Virginia Premium Savings Parameters PY 2027

- Goal: Promote affordability; Recapture and stabilize enrollment
- Parameters:
 - QHP-eligible consumers, some without APTC may qualify
 - Covers remaining premium after APTC
 - Fixed per-member, per month carrier payment
 - Applied at household level
 - Available to applicant plus ratable dependents

FPL Category	Monthly Subsidy (PMPM)	Expected Percent Enrollment Increase	Expected VaPS Enrollment
138 - <150	\$65	30%	44700
150 - <200	\$90	24%	65900
200 - <250	\$90	15%	48600
			159200

Virginia Premium Savings: Modeling Results

FPL	Subsidy Offered	Effective Subsidy PMPM	Net Premium Decrease
200-250	\$90	\$84	-47%
150-200	\$90	\$86	-70%
138 – 150	\$65	\$60	-69%
Average		\$78	-62%

Virginia Premium Savings: Consumer Experience

Sample Case: Single, 30-year-old consumer, Henrico County, \$22,500 MAGI (138%-150% FPL)

2027 Eligibility Summary

Based on your application, members of your household are eligible for:

- ✓ Qualified Health and Dental Plans
- ✓ Advanced Premium Tax Credit of up to \$399.50 for your household to lower your monthly i
- ✓ Virginia Premium Savings of up to \$65.00 for your household.
- ✓ Cost Sharing Reductions to lower copayments, coinsurance and deductibles.

Your eligibility is based on your income of \$22500 and a household of 1, as well as other factors. L application if this information has changed.

SILVER HMO CSR Eligible \$4.19/month After \$464.50 monthly savings PRIMA GE Federal = \$399.50 Virginia = \$65.00 Total Savings = \$464.50 OOP MAX \$2350 Sentara Individual NETWORK & Family Health Plans OVERALL QUALITY Currently RATING unavailable My Facilities Search My Doctors Search	SILVER HMO CSR Eligible \$4.92/month After \$464.50 monthly savings PRIMARY CARE VISIT \$10 Copay GENERIC DRUGS \$5 Copay DEDUCTIBLE \$0 OOP MAX \$2800 Sentara Individual NETWORK & Family Health Plans OVERALL QUALITY Currently RATING unavailable My Facilities Search My Doctors Search	SILVER HMO CSR Eligible \$19.04/month After \$464.50 monthly savings PRIMARY CARE VISIT \$0 Copay GENERIC DRUGS \$0 Copay DEDUCTIBLE \$0 OOP MAX \$2600 Sentara Individual NETWORK & Family Health Plans OVERALL QUALITY Currently RATING unavailable My Facilities Search My Doctors Search
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Virginia Premium Savings Implementation Roadmap

❖ June:

- Virginia Biennial Budget adopted. (6/29)
- Included **\$150,000,000** for the Virginia Health Insurance Affordability Fund.
- Carrier pre-testing.

❖ July-August:

- Exchange process development.
- Actuarial modeling.
- System updates development.

❖ September:

- Statewide outreach and marketing campaign begins
- System updates

❖ October:

- Expected- VaPS information live for window shopping 10/1.
- Marketplace systems and notices will display VaPS eligibility.

❖ November+

- VaPS available for PY 27 coverage.
- Ongoing consumer outreach and marketing



Commonwealth of Virginia

Notice of Benefit and Payment Parameters

NBPP and PY27 Legal Landscape

- May 15: 2027 NBPP finalized
- June 3: City of Columbus v. Kennedy (2026) filed; challenges several provisions of 2027 NBPP
- June 12: City of Columbus v. Kennedy (2025) decision; vacates several provisions from Marketplace Integrity Rule impacting PY26
- July 16: City of Columbus v. Kennedy (2026) initial ruling; blocks several provisions of 2027 NBPP
- The 2025 and 2026 filings challenge overlapping provisions across plan years

HBE is closely monitoring legal updates and making PY27 policy decisions within this context

Provisions Stayed or Overturned by Federal Court

	Shortened open enrollment (overturned)	
	Increased verifications for Special Enrollment Periods (stayed)	
	Elimination of standardized plan designs and limits (stayed)	
	Additional income verifications (stayed)	
	Option for Bronze plans to increase max out of pocket (stayed)	
	Failure to reconcile tax credits PY27 (stayed)	
	Expanded eligibility for catastrophic plans (stayed)	
	Loosened network adequacy rules (stayed)	

Provisions Required for State-based Marketplaces

Increased maximum out of pocket for catastrophic plans (PY28).*

State requirement to defray state mandated benefits since 2011 (PY2028).

State Exchange Improper Payment Measurement- increased federal oversight.

Areas of Discretion for State-based Marketplaces

Multi-year catastrophic plan design*

Permitting non-network plans*

Looking Ahead

- **Looking Ahead: Future Federal Regulatory Actions**
 - Pre-enrollment Verification NPRM
 - Expanding access to ICHRA's and STLDI NPRMs
 - Improper Payments/"CRUSH" NPRM

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