

# Exchange Response to Federal Changes

Exchange Advisory Committee

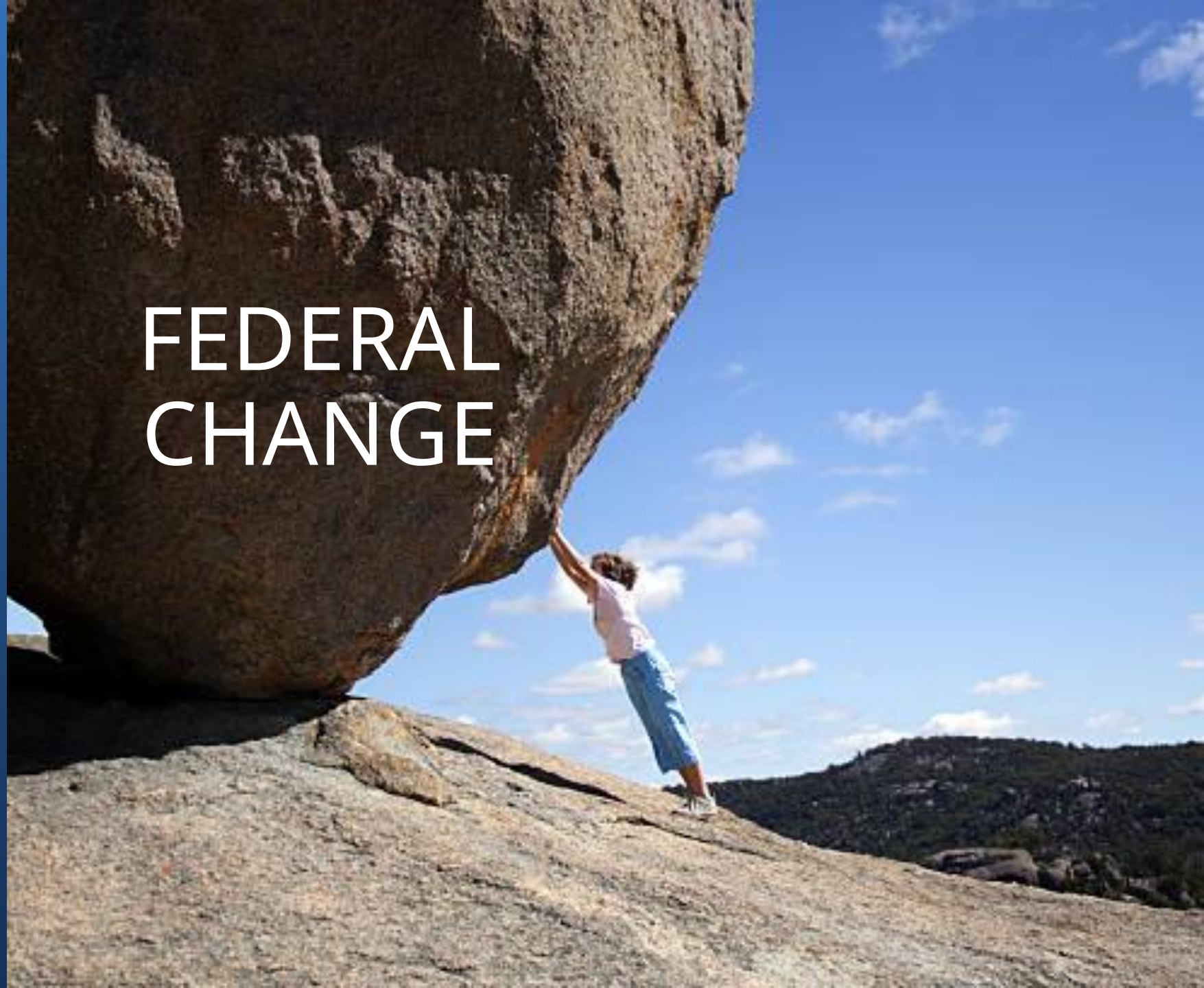
August 28, 2025

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- ▶ Changes impacting affordability of coverage
- ▶ Changes impacting Medicaid & Marketplace
- ▶ Changes impacting equitable access to coverage

# FEDERAL CHANGE



# 2026 Updates

Implementation of Federal Changes

# Exchange approach to implementing federal changes



- ▶ Strategic implementation of requirements, with focus on customer harm reduction
  - ▶ PY 2026 OE:
    - ▶ Some lawfully present populations losing federal savings



- ▶ Proactive mitigation to keep customers covered
  - ▶ PY 2026 mitigations:
    - ▶ Premium alignment
    - ▶ Cascade Care Savings
    - ▶ WA Health Path



# Mid-Range Response

Exchange Board Retreat Follow Up

# Federal changes present risks to market & customers



Plan year  
2025

- Eliminating tax credits for DACA population as of Oct. 1, 2025. Remain in QHP coverage through state's immigrant health coverage program.



Plan year  
2026

- Eliminating federal subsidies for lawfully present immigrants with incomes below 100% FPL.
- Removing APTC repayment caps.
- Enhanced premium tax credits expire.



Plan year  
2027

- Shortening open enrollment period.
- AV changes increasing out of pocket costs.
- Eliminating federal subsidies for many lawfully present immigrants.
- People denied Medicaid due to work requirements also denied QHP federal subsidies.



Plan year  
2028 & beyond

- Eliminating automatic re-enrollment and conditional eligibility for federal subsidies.
- Canceling APTCs for failure to reconcile after one year.

# Exchange Certification Role and Authority

- ▶ **Board Retreat direction:** Exchange Board needs authority to curate the market to address market failures and changes that present risk
  - ▶ Focus on premium affordability, access to coverage & care, and simplified plan choice



## Current state:

- ▶ Only plans certified by the Board may be offered in the Exchange
- ▶ Under WA law, the Exchange Board is required to certify any plan that meets the certification criteria
  - ▶ Criteria does not include premium factors, county coverage, or Bronze requirements
  - ▶ Added benefit design standards starting plan year 2021 with Cascade Care legislation
- ▶ The Board cannot add certification criteria

# Exchange Certification Requirements



## Customer shopping experience criteria

Use *Healthplanfinder* application, meet benefit display standards, participate in Exchange-wide provider directory, follow Exchange marketing guidelines

## Quality criteria

Report quality metrics to Exchange, engage in quality improvement efforts

## Cascade Care criteria

Meet standard plan design requirements, participate in premium assistance program

## Administrative criteria

Pay Exchange user fees, maintain accreditation with national accrediting body, provide plan benefit and rate data

# Exchange Options to Address Market Risks

What do you want to address?

Keep Premiums Affordable

- + Public option active purchasing\* (HCA)
- + Premium alignment (OIC)
- Active selection of low-premium plans\*
- + Sustained public subsidy funding
- Plan meaningful difference standards protecting APTC benchmark\*
- Target application of state subsidy to most affordable plans

Mitigate Bare Counties (Carriers & Plans)

- + Public option participation enforcement & strengthening\* (HCA)
- Plan meaningful difference standards that define & incentivize market needs by geography\*

Protect Against Skippy Coverage

- + Limit or eliminate\* non-standard plans
- Active selection of high-quality carriers\*
- Plan meaningful difference standards prioritizing high-value care access\*
- Target application of state subsidy to highest-quality plans or carriers

Help Customers Through Complicated Eligibility/Enrollment

- + Curated plan shelf\* & decision support
- + Facilitated enrollment
- Eliminate non-standard plans\*
- Targeted state subsidy for populations most vulnerable to uninsurance
- Plan meaningful difference standards to simplify choices\*

+ Some progress in WA w/ opportunities to advance  
\*Requires additional authority

○ Not in progress in WA  
\*Requires additional authority

# Discussion and Next Steps

## Continued Policy Development

### Engagement with:

- Board
- Stakeholders
- Partners
- Cascade Care Workgroup
- Other Exchanges



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