

Agents and Broker Technical Advisory Committee

January 21, 2026

Agenda

Welcome

Exchange Access & Affordability/ePTC Update

Open Enrollment 13 Data Preview

Open Enrollment Feedback: Premium Alignment

Producer Program Event Reminders

Questions & Public Comment

Next Meeting & Adjourn

Exchange Access and Affordability

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The problem for 2027 and beyond



Unprecedented federal changes in health care is impacting ability to:

- Get Coverage
- Keep Coverage
- Afford Coverage

Uncertainty is driving market changes:

- 26% average increase in the Exchange market in 2026

Not every county has carrier, metal level, or network choice

Exchange has limited authority to:

- Stabilize the market
- Drive affordability
- Simplify the customer experience

Problem – Market Dynamics in 2026



On the path to bare counties – San Juan County

- Customers choose from only **one** carrier
- Customers do not have a Bronze plan available



Oversaturated counties – King County

- Customers choose from 63 health plans from 10 carriers

18 Bronze Plans

16 Silver Plans

28 Gold Plans

1 Catastrophic Plan

Customers in San Juan County limited to one carrier, no Bronze plans

Limited choice and high premium for least expensive plan — especially challenging for unsubsidized customers

Scenario: Early retirees 60 and 63 in Friday Harbor; not eligible for tax credits **now paying \$1,000** more per month for coverage in lowest cost plan

	2025	2026
Offerings	3 carriers; 20 plans	1 carrier; 5 plans
Lowest Cost Plan	Ambetter Essential Care 1 Bronze	Ambetter Secure Care 5 Gold
Premium for Couple	\$1,353	\$ 2,394



Board's ability to respond is limited

Washington is the only state-based exchange prohibited by state law from adding certification requirements if needed to safeguard consumer interests



The Exchange Board **must** approve all health plans that meet the certification criteria*
(RCW 43.71.065)

- Ensure customer shopping experience
- Review quality metrics
- Meet Cascade Care requirements
- Meet Administrative measures

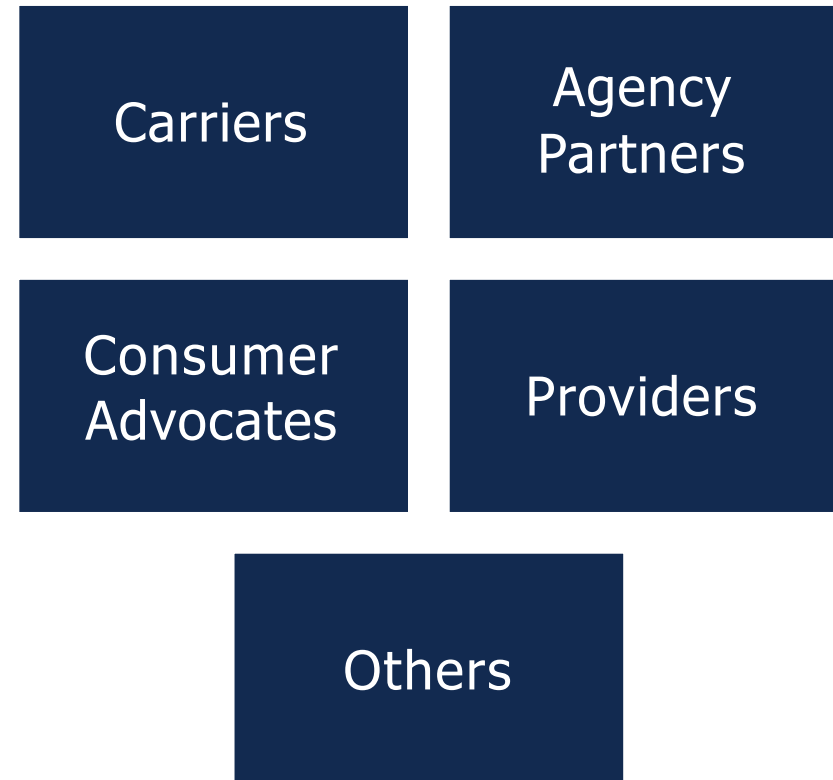
- Adapt to market shifts and ensure stability
- Use of tools to drive affordability are maximized
- Customers have a simpler shopping experience

State law does **not allow** the Exchange Board to add other certification criteria

*See appendix for full list of criteria used by the Exchange and OIC in health plan review process

Stakeholder Engagement and Feedback

- ▶ Ongoing discussions through committees, workgroups, and one-on-one discussions
- ▶ Draft bill language shared late-Nov
- ▶ Ongoing legislator discussions



Legislative Proposal

Allow the Exchange to add certification criteria each year to address access and affordability.

Access to health plans

- Be meaningfully different (benefits, premiums, network, quality)
- Available from more than one carrier in each county

Affordability of health plans

- Maximize federal tax credits
- Efficiently use state funds
- Available at each metal level

Proposed: Address underserved counties in 2027

Draft PY 2027 access & affordability standard

- ▶ Carriers filing plans in rating area 8 must file plan in San Juan County
- ▶ Carriers proposing to expand into counties with more than 6 carriers in 2026 must file plan in San Juan County

Why this is a priority for PY 2027

- ▶ San Juan County has one carrier option in 2026
- ▶ As an underserved county, San Juan customers are at risk of having no QHP access in 2027

Intended Exchange customer outcome

- ▶ Exchange customers in every county have access to QHPs from at least two carriers



Proposed: Ensure range of premium options in 2027

Draft PY 2027 access & affordability standard

- ▶ Coverage proposed in underserved counties must include Bronze, Silver and Gold metal levels

Why this is a priority for PY 2027

- ▶ As an underserved county, San Juan customers don't have access to Bronze plans in 2026
- ▶ More carriers at risk of not offering Bronze in future plan years
- ▶ Gaps in current law: ACA requires Gold & Silver; public option requires Bronze

Intended Exchange customer outcome

- ▶ Exchange customers in every county have access to a Bronze plan
- ▶ Access to lower-premium Bronze plans help keep customers enrolled who may otherwise drop coverage



Proposed access & affordability Exchange Board milestones

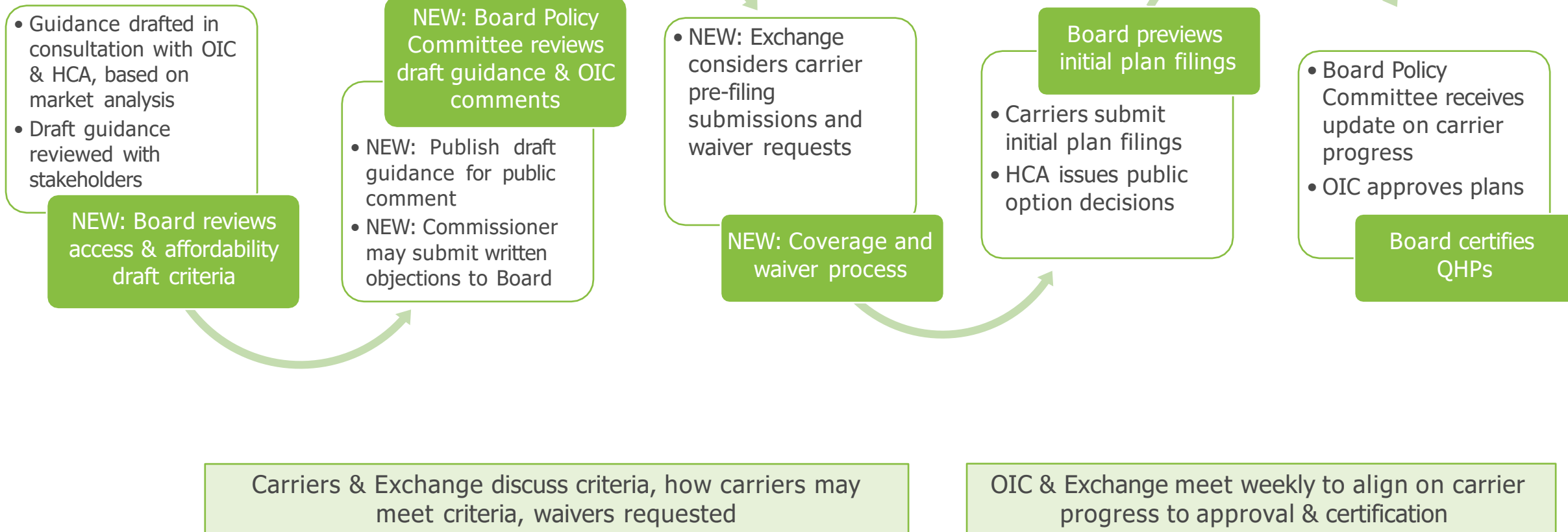
November-December

January

February-May

May-July

August-September



Waiver process for proposed access & affordability standards

- ▶ Exchange will work with carriers to understand barriers to meeting requirements and consider waivers
- ▶ PY 2027 scenario:



Carriers planning to file in rating area 8 required to file Bronze, Silver, Gold plans in San Juan County



From Dec-May, Exchange & carriers actively discuss certification requirements and factors that may be barriers

For example, provider network or impact on premiums



Prior to May filing deadline, Exchange considers totality of coverage options proposed, and the impacts on customers of waiving requirements

Next Steps – Moving Forward with Bill and New Criteria

- ▶ Identified legislative sponsors and filing bill
- ▶ Developing waiver requirements and starting new certification process with carriers
 - ▶ Guidance for Participation released for public comment Jan 13th
- ▶ Recognize new criteria dependent upon session law



Appendix

Shaping the Exchange Marketplace Together



- ▶ **Step 1:** OIC approves plans that meet regulatory standards (e.g., actuarially sound rates and adequate networks)

- ▶ **Step 2:** Exchange evaluates if carriers have met additional certification criteria to be offered on Exchange (e.g., standard plan design, quality reporting)



- ▶ **Step 3:** After OIC approval and Exchange certification, HCA contracts with select carriers to offer Public Option plans (e.g., additional contracting and provider reimbursement requirements)

Current Plan Certification Criteria

Exchange authority

- ▶ Pay assessed user fees
- ▶ Comply with Cascade Care requirements**
- ▶ Achieve accreditation with a national organization
- ▶ Use the Exchange enrollment application
- ▶ Meet marketing requirements
- ▶ Submit provider directory data
- ▶ Implement a quality improvement strategy
- ▶ Submit health plan data in standard format for presenting health benefit plan options to consumers
- ▶ Report quality and health performance data
- ▶ Comply with benefit design standards (cost sharing limits, metal level, essential health benefits, standard plan design)**
- ▶ Submit health plan benefit, cost-sharing, and premium rate data to display on web pages for consumer shopping**

OIC authority

- ▶ Be licensed and good standing
- ▶ Comply with risk adjustment program
- ▶ Comply with Cascade Care requirements**
- ▶ Comply with non-discrimination rules
- ▶ Meet network access requirements
- ▶ Use hospital patient safety contracts
- ▶ If offered, integrate direct primary care medical home into QHP
- ▶ Comply with benefit design standards (essential health benefits, limits on cost sharing, metal levels, standard benefit design)**
- ▶ Comply with service area standards for a QHP (county, zip code) and submit rates for a plan year
- ▶ Must post justifications for premium increases
- ▶ Must submit QHP benefit and rate data for public disclosure**

**Under the authority of both the Exchange and OIC

Safeguarding Consumers

▶ **Affordable Care Act**

- ▶ In general, an exchange may certify a health plan as a qualified health plan if –
 - ▶ Such health plan meets the requirements for certification as promulgated by the Secretary under subsection (c)(1); and
 - ▶ The Exchange determines that making such health plan through the Exchange is in the **interest of qualified individuals** and qualified employers in the State or States in which such Exchange operates...

▶ **Other states**

- ▶ ACA language included in state statutes in **CA, CT, DC, IL, MD, MN, NY, VA**
- ▶ “meaningfully different” criteria in **CA, CO, DC, ID, MA, NM, NY, PA, RI, VT**

Questions?

Open Enrollment 13 Data Preview

OE 13 by the Numbers

Here is an initial look at OE numbers as of Jan. 20th*:

We closed open enrollment with more than 290,000 plan selections, higher than expected.

- ▶ **Current data does not tell a full picture of this OE**, and we anticipate more consumers will drop coverage in the months to come.
 - ▶ We expect customers to drop coverage as they receive their first bills in January or February.
 - ▶ Early analyses include some trends and serve as warning signs of continued coverage losses, increased out-of-pocket consumer costs, and expected market disruption in the months ahead.
 - ▶ We know some customers are buying plans with lower levels of coverage and higher out-of-pocket costs.
 - ▶ In normal years, we expect a 5-10% drop from this high point as our customers decide whether to make their first payment.
 - ▶ Almost 41,000 new customers have selected a plan. (17% lower than this time last year)
 - ▶ 28,000 customers have actively dropped their coverage. (38% higher than this time last year)
- ▶ Almost 18,000 of our new enrollees were formerly in Apple Health plans last year - they account for almost half of our new enrollees for 2026.
- ▶ From Nov 1-Jan 9 - the customer support center took around 220K phone calls from Washingtonians with questions about open enrollment.
 - ▶ Call volume has been above average for eight of the 11 weeks recorded to date and exceeded last year's maximum last week.
- ▶ Those who are the hardest hit include 26,000+ customers above the "ACA subsidy cliff" and 10,000+ very low-income lawfully present immigrants. Both groups have lost access to federal tax credits altogether and are experiencing sticker shock.
- ▶ For the first time ever, most new customers chose Gold plans (26K vs 15K in Bronze and Silver). We closed OE with 53% of customers on Gold plans and 23.5% on the new, lower-cost Vital Gold standard plan.

***Please note that this data will change in the coming months depending on effectuation.**

Open Enrollment Feedback: Premium Alignment

Committee Members – THANK YOU!

Brisa Guajardo | Community Health Plan of Washington

Rosemary Garden | Rosemary Garden Finance and Wellness

David Cross | Acrisure Northwest Region

Nicole Rayl | Office of the Insurance Commissioner

Neil Angst | Health Insurance Solutions NW 4

Erica T. C. Kuo | Insurance Producer

Karol Munsinger | Financial Designs, Inc.

Julie Shepard | Integrity Insurance Solutions

Stacie Tennyson | Washington Health Insurance Professionals, LLC



LifePlan Financial Inc





Upcoming Events & Reminders



**New Producer
Certification
February 17, 2026**



**Wednesday, February 18th
12 PM-1 PM**

- ▶ **Topics: 1095-As, SEPS, CEV, and Appeals**
 - ▶ **Q&A Session**

Public Comment

Please unmute yourself
to make a public
comment.

Questions

producer@wahbexchange.org

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Next Meeting

April 15, 2026

9:30 am-11:00 am



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