



**Washington Health Benefit Exchange  
Navigator & Certified Application Counselors Technical Advisory Committee  
Meeting Minutes  
Wednesday, October 16, 2025  
2:30 p.m. – 3:30 p.m.  
Teleconference and Webinar**

**NAV CAC TAC Members Present:**

Alex Cordova  
Bishaw Gezie  
Brian Mwesigwa  
Noreen Brisson

Molly Morris  
Yuvi Arciniega  
Sara Abbott

**Washington Health Benefit Exchange (WAHBE) Staff Present:**

Alex Jonson  
Kristin Villas  
Joan Altman

Kristin Phillips  
Kelly Aaron

**Meeting notes:**

**Market Changes and Carrier Adjustments**

The expiration of enhanced premium tax credits is a central issue leading to widespread premium increases and changes in plan offerings by carriers. The introduction of a new Cascade Vital Gold plan and the reduction in non-standard plan options by carriers such as Molina and Wellpoint have contributed to an average premium increase of 26%. This increase is partly due to a premium alignment strategy that raises silver plan rates to maximize federal tax credits, offsetting subsidy losses from the expiration of enhanced tax credits. However, this strategy results in silver premiums being higher than gold premiums, changing the traditional metal tier cost structure. Service areas have also shifted, with some counties like San Juan losing carriers and plan options, notably losing bronze plans, while others like King County have an abundance of plans, complicating consumer choice.

**Geographic Disparities in Coverage**

- San Juan County faces coverage challenges with only one carrier remaining, no bronze plans, and significant premium increases for customers without tax credits.



- King County offers 63 plans, creating complexity for consumers in plan selection compared to employer coverage options.
- The public option (Cascade Select plans) remains the lowest premium choice in many counties but is unavailable statewide, notably absent in San Juan County.

## **Customer Impact and Support Strategies**

Approximately 80,000 individuals are projected to drop coverage due to premium increases if no action is taken. To mitigate this, the Office of Insurance Commissioner (OIC) and partners have implemented measures including removing tobacco rating, reserving cascade care savings for those without affordable minimum essential coverage, and using premium alignment to increase federal tax credit capture. Cross mapping policies will help transition customers to plans with better coverage or lower costs, such as moving many from silver to the new Cascade Vital Gold plan. The Smart Plan Finder tool has been updated to recommend cascade plans primarily and adjust plan visibility based on subsidy eligibility, aiming to simplify consumer decision-making.

## **Premium Alignment Effects**

- Silver plan premiums increased by about 40%, making some silver plans more expensive than gold plans.
- Federally subsidized customers under 200% FPL may benefit from silver plans due to richer benefits, while others may find gold plans more cost-effective.
- Customers over 400% FPL and those losing federal tax credits face full premium increases without offset.

## **Immigrant Community Impacts and Federal Policy Changes**

The document highlights profound federal policy changes affecting immigrant populations, including Deferred Action for Childhood Arrivals (DACA) recipients and lawfully present immigrants. Key points include:

- DACA recipients in Washington retain access to qualified health plans (QHPs) through a state 1332 waiver, unlike in other states, but lost federal subsidies as of October 1, 2025, leading to premium increases.
- Lawfully present immigrants under 100% of the federal poverty level (FPL) lose eligibility for federal subsidies starting in 2026, creating significant affordability barriers with average subsidy losses of about \$600 per member per month.



- Starting January 2027, most lawfully present immigrants outside three specific categories (lawful permanent residents, COFA citizens, and Cuban/Haitian entrants) will lose federal subsidies and Medicaid eligibility, with similar restrictions applying to Medicare eligibility from mid-2024 onwards.
- These changes create coverage and affordability challenges, especially for low-income and senior immigrant populations.

## **State and Community Response**

- The Washington Exchange collaborates with multiple stakeholders, including immigrant advocacy groups and health equity committees, to communicate changes and provide support.
- State premium subsidies (Cascade Care Savings) are available through 2026 for those up to 250% FPL but are insufficient to fully replace lost federal subsidies.
- Sponsorship programs and community-based organizations play a vital role in assisting coverage affordability and outreach.
- Privacy protections remain in place for undocumented individuals applying through Health Plan Finder, although some data sharing occurs for Medicaid and emergency medical services, raising privacy considerations.

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## **Washington Health Pathways Program and Waiver Contingency Planning**

In anticipation of possible federal withdrawal of the waiver allowing undocumented individuals to purchase QHPs, Washington is establishing the Washington Health Pathways program for 2026. This program will provide a separate coverage pathway with navigators assisting enrollment, maintaining privacy protections similar to those under the waiver. The program aims to ensure continuity of coverage and reduce disruption for waiver customers.

## **Future Directions and Challenges**

The document concludes by acknowledging the unprecedented scale of changes and the resulting affordability and coverage challenges. The Exchange is exploring additional tools and authorities to stabilize the market and improve affordability, including extending Cascade Care Savings beyond 2026, expanding sponsorship programs, enhancing facilitated enrollment, and improving customer support tools. The ongoing federal uncertainty requires continuous adaptation and collaboration among stakeholders to protect coverage access for vulnerable populations.