

## Draft New Exchange Certification Criteria – December 2025

### 2.2.20<sup>1</sup> Access and Affordability Standards

Each year, the Exchange, in consultation with OIC and HCA, considers access and affordability standards that carriers will be required to meet for their plans to be certified and offered as Qualified Health Plans (QHPs) in the Exchange. These standards are developed annually through a stakeholder feedback process articulated in RCW XX.XX.XXX.

Each year when draft access and affordability standards for an upcoming plan year are published, the Exchange will begin discussions with carriers to understand any concerns they have regarding their ability to meet the applicable criteria. Following initial submission of plan filings in the spring each year, the Exchange will evaluate each carrier's ability to meet the access and affordability standards applicable to the upcoming plan year and, if the Exchange identifies any concern, it will provide direction to the carrier as to how the deficiency may be cured or the carrier may request a waiver. In considering whether to grant a waiver of access and affordability standards for a plan year, the Exchange will consider if granting such a waiver would be in the interest of residents of Washington state and may require carriers to provide documentation of inability to comply with applicable plan certification criteria.

For Plan Year (PY) 2027, the below standards will apply.

#### Access and Affordability Standards for PY 2027

**Preventing underserved counties.** Carriers filing plans for PY 2027 in a rating area that includes an underserved county are generally required to file an Exchange coverage area for PY 2027 that includes coverage of the underserved county. Underserved counties are defined to include counties with one carrier offering on-Exchange coverage and counties that do not offer a fully insured PEBB or SEBB product in the prior plan year. For PY 2027, the Exchange considers San Juan County underserved. In addition, carriers proposing to expand their PY 2027 Exchange service area into (or their plan offerings in) saturated counties, defined for PY 2027 as counties with more than six carriers in PY 2026, are generally required to include any underserved county in their proposed service area for PY 2027. All proposals for 2027 coverage in an underserved county must include a plan at the bronze, silver, and gold metal levels.

**Waiver process.** A carrier may request a waiver of the access and affordability standards for PY 2027. Waivers will be granted at the discretion of the Exchange, in consultation with OIC and HCA. When making a determination regarding the granting of a waiver from these requirements, the Exchange will consider such factors as evidence of good faith efforts to contract with providers sufficient to form an adequate network in underserved counties, exhibited breadth and cost of potential network, impact on premiums, legal prohibitions on or other barriers to a carrier's ability to offer coverage in certain service areas, and justification of the necessity of changing other aspects of service area. In considering any waiver request, the Exchange will consider the totality of coverage options proposed in the underserved county for PY 2027 and the impacts of granting and not granting a waiver of these requirements on the interests of the residents of Washington State. A carrier requesting a waiver may be required to submit data on service area and rates that would be in place under these requirements as well as if the waiver were to be granted, in the form required by the Exchange. In considering any waiver request, the Exchange will consider the carrier's active participation in the waiver request process during the time period after publication of the draft certification requirements and before the initial OIC plan filing deadline.

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<sup>1</sup> This is a proposed 20<sup>th</sup> certification criterion that would be added to the Exchange's 2027 QHP Guidance for Participation ([2026 version linked here](#)).