

Draft 2026 Standard Plan Designs

*Proposed plan designs for 2026 Cascade and
Cascade Select plans*

*Instructions for submitting public comment
(Jan. 9 - Jan. 29, 2025)*

Standard plan design background

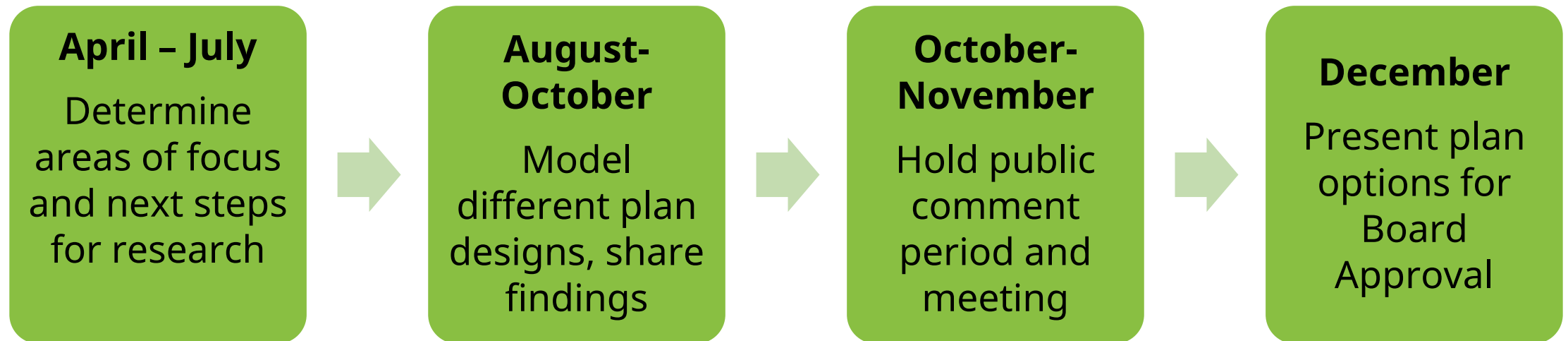
Exchange standard plan program

- ▶ Have designed five years of standard plans starting in 2021.
- ▶ Essential, high value services at co-pay before deductible in all metal levels (primary care, mental/behavioral health, urgent care, generic Rx).

Goals for standard plans from [Cascade Care Legislation](#)

- ▶ Lower deductibles and access to services before the deductible.
- ▶ Prioritize copays, where possible, to provide predictability for consumers when seeking services.
- ▶ Limit premium impacts.
- ▶ Maximize tax credits with Silver plan design.

Typical timeline of stakeholder and Board engagement on standard plan design



Exchange Board approved three 2026 standard plans in December meeting

Benefits	2026 Standard Gold	2026 Standard Silver	2026 Standard Bronze
Deductible and Out-of-Pocket Maximum			
Medical/Pharmacy Integrated Deductible	Yes	Yes	Yes
Medical (or Integrated, if Applicable)/Pharmacy Deductibles (\$)	\$1,000	\$2,500	\$6,000
Medical/Pharmacy Integrated MOOP	Yes	Yes	Yes
Medical/Pharmacy Integrated MOOP (\$)	\$7,000	\$9,750	\$10,150
Office Visits			
Preventive Care/Screening/Immunization	\$0	\$0	\$0
Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)	\$15	\$20***	\$40***
Specialist Visit	\$40	\$65	\$100
Mental/Behavioral Health and Substance Use Disorder Outpatient Services-Office	\$15	\$20***	\$40***
Emergency/Urgent Care Services			
Emergency Care Services	\$450	\$800	40%
Urgent Care	\$35	\$65	\$100
Ambulance	\$375	\$375	40%
Outpatient Services			
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)	\$350	\$600	40%
Outpatient Surgery Physician/Surgical Services	\$75	\$200	40%
Mental/Behavioral Health and Substance Use Disorder Outpatient Services - Other	\$15	\$30	40%
Outpatient Diagnostic Tests			
Laboratory Outpatient and Professional Services	\$20	\$40	40%
X-rays and Diagnostic Imaging	\$30	\$65	40%
Advanced Imaging (CT/PET Scans, MRIs)	\$300	30%	40%
Inpatient Services			
All Inpatient Hospital Services (inc. MH/SUD, Maternity)	\$525*	\$800*	40%
Skilled Nursing Facility	\$350**	\$800**	40%
Pharmacy			
Generics	\$10	\$25	\$32
Preferred Brand Drugs	\$60	\$75	40%
Non-Preferred Brand Drugs	\$100	\$250	40%
Specialty Drugs (i.e. high-cost)	\$100	\$250	40%
All Other Benefits			
Speech Therapy	\$25	\$40	40%
Occupational and Physical Therapy	\$25	\$40	40%
Durable Medical Equipment (DME)	20%	30%	40%
Home Health	\$15**	\$30**	\$50**
Hospice	\$15**	\$30**	\$50**
All Other Benefits	20%	30%	40%
AV	81.81%	71.84%	64.97%

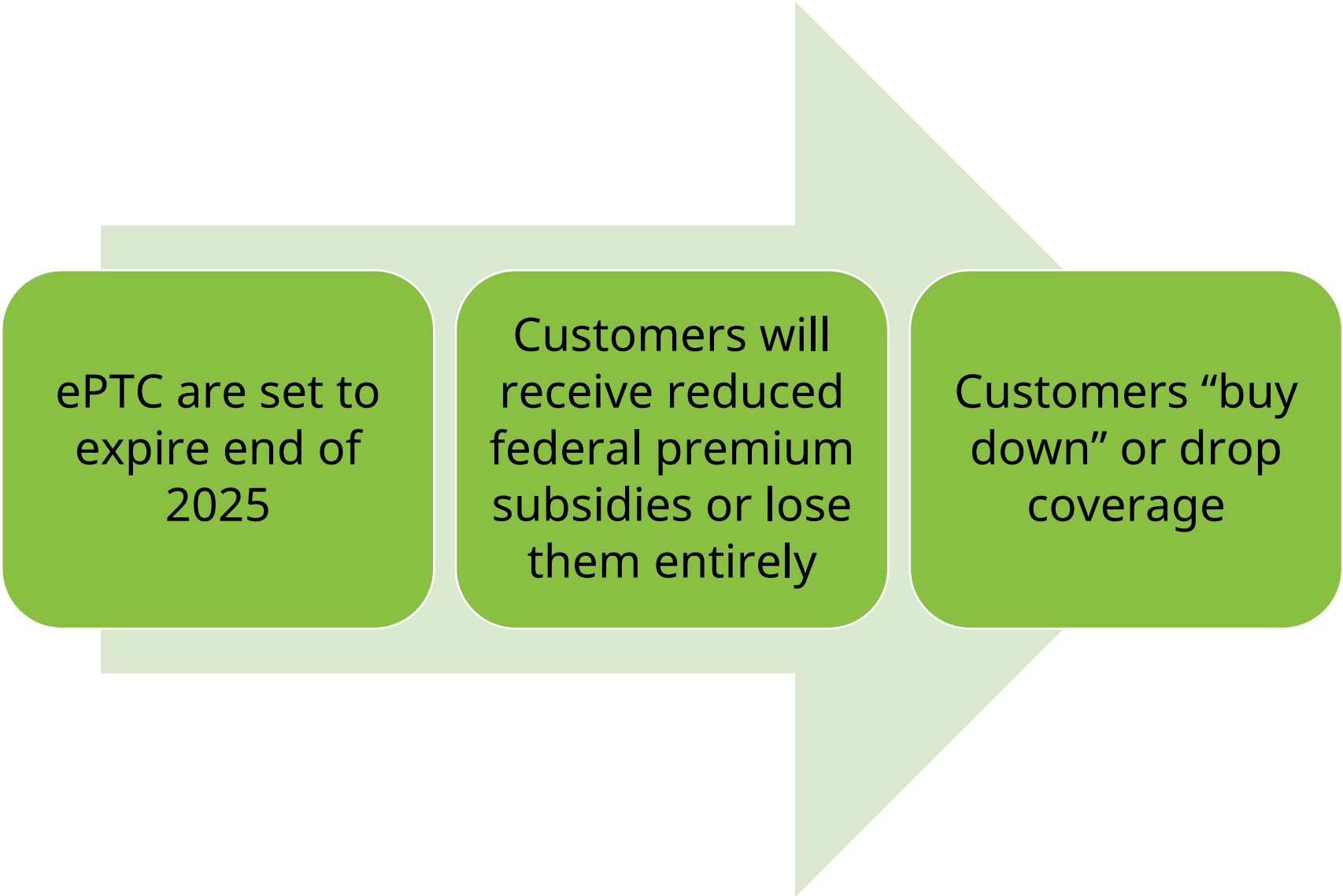
Blue shaded items are not subject to deductible. Board also approved Silver cost-sharing reduction (CSR) variants.

* Per day copay, maximum of five copays per stay.

** Per day copay.

*** Eligible for two visits at \$1 copay, after which stated cost-sharing applies.

Expiration of enhanced premium tax credits (ePTC) drives need for additional standard plans



ePTC are set to expire end of 2025

Customers will receive reduced federal premium subsidies or lose them entirely

Customers “buy down” or drop coverage

Proposing two additional 2026 standard plan designs to meet market needs

- ▶ The Exchange has legislative authority under [SB 5377](#) to design up to three standard plans per metal level.
- ▶ We are accepting public comment on:
 - ▶ A Bronze high-deductible health plan (HDHP) that is health savings account (HSA) compatible, with low actuarial value (AV).
 - ▶ A Low AV Gold plan close in AV to standard Silver.
- ▶ Goals are to promote affordability and keep people covered with plan options that work for customers across the spectrum.



Bronze HDHP HSA plan to help unsubsidized customers maintain coverage

- ▶ Potential customer:
 - ▶ Higher income (400%+ FPL)
 - ▶ Recognize that some customers with little disposable income may select plan because of premium
 - ▶ Was receiving tax credits prior to ePTC expiration
 - ▶ Would otherwise drop coverage if a very low premium plan is unavailable
- ▶ Plan key facts:
 - ▶ Meets IRS High Deductible Health Plan Requirements for 2026
 - ▶ Per HDHP rules, no services other than preventive before deductible
 - ▶ Plan type only available in 30 counties for 2025
 - ▶ Low AV intended to ensure low premium, minimal coverage option



Standard Bronze HSA options

All options have out-of-pocket maximum (MOOP) of \$10,150

- Option 1 – Deductible is increased by \$100
- Option 2 – Deductible is increased by an additional \$4,050 (same as MOOP)

Shaded items are not subject to Deductible

*Eligible for two visits at \$1 copay, after which stated cost-sharing applies

**Per day copay

Benefits	Bronze HSA		
	2026 Approved Bronze (reference)	Option 1	Option 2
Deductible and Out-of-Pocket Maximum			
Medical/Pharmacy Integrated Deductible	Yes	Yes	Yes
Medical (or Integrated, if Applicable)/Pharmacy Deductibles (\$)	\$6,000	\$6,100	\$10,150
Medical/Pharmacy Integrated MOOP	Yes	Yes	Yes
Medical/Pharmacy Integrated MOOP (\$)	\$10,150	\$10,150	\$10,150
Office Visits			
Preventive Care/Screening/Immunization	\$0	\$0	\$0
Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)	\$40*	40%	100%
Specialist Visit	\$100	40%	100%
Mental/Behavioral Health and Substance Use Disorder Outpatient Services-Office	\$40*	40%	100%
Emergency/Urgent Care Services			
Emergency Care Services	40%	40%	100%
Urgent Care	\$100	40%	100%
Ambulance	40%	40%	100%
Outpatient Services			
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)	40%	40%	100%
Outpatient Surgery Physician/Surgical Services	40%	40%	100%
Mental/Behavioral Health and Substance Use Disorder Outpatient Services - Other	40%	40%	100%
Outpatient Diagnostic Tests			
Laboratory Outpatient and Professional Services	40%	40%	100%
X-rays and Diagnostic Imaging	40%	40%	100%
Advanced Imaging (CT/PET Scans, MRIs)	40%	40%	100%
Inpatient Services			
All Inpatient Hospital Services (inc. MH/SUD, Maternity)	40%	40%	100%
Skilled Nursing Facility	40%	40%	100%
Pharmacy			
Generics	\$32	40%	100%
Preferred Brand Drugs	40%	40%	100%
Non-Preferred Brand Drugs	40%	40%	100%
Specialty Drugs (i.e. high-cost)	40%	40%	100%
All Other Benefits			
Speech Therapy	40%	40%	100%
Occupational and Physical Therapy	40%	40%	100%
Durable Medical Equipment (DME)	40%	40%	100%
Home Health	\$50**	40%	100%
Hospice	\$50**	40%	100%
All Other Benefits	40%	40%	100%
AV	64.97%	61.01%	59.20%

Low Gold AV plan for comprehensive coverage

- ▶ Potential customer:
 - ▶ Has average utilization
 - ▶ Unlikely to hit MOOP or have conditions requiring ER visits or high-cost drugs
 - ▶ Wants comprehensive coverage, but not eligible for cost-sharing reductions (CSRs) in Silver plan
- ▶ Plan facts:
 - ▶ Depending on carrier, low Gold plan premiums may be the same price or lower than Silver premium
 - ▶ May have higher premiums than non-standard Gold plans
 - ▶ Predictability of copays in standard plan benefit design encourages use of insurance, which increases plan pricing.



Standard low Gold AV options

- ▶ Compared to 2026 approved Gold
 - ▶ Option 1 raises the deductible by \$900 and MOOP by \$1,800; Keeps many cost shares the same
 - ▶ Option 2 raises the deductible by only \$500 MOOP by only \$550 but increases many cost shares

Shaded items are not subject to deductible.

* Per day copay, maximum of five copays per stay

** Per day copay

*** Eligible for two visits at \$1 copay, after which stated cost-sharing applies

Benefits	Low AV Gold		
	2026 Approved Gold	Option 1	Option 2
Deductible and Out-of-Pocket Maximum			
Medical/Pharmacy Integrated Deductible	Yes	Yes	Yes
Medical (or Integrated, if Applicable)/Pharmacy Deductibles (\$)	\$1,000	\$1,900	\$1,500
Medical/Pharmacy Integrated MOOP	Yes	Yes	Yes
Medical/Pharmacy Integrated MOOP (\$)	\$7,000	\$8,800	\$7,550
Office Visits			
Preventive Care/Screening/Immunization	\$0	\$0	\$0
Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)	\$15	\$15	\$20***
Specialist Visit	\$40	\$40	\$45
Mental/Behavioral Health and Substance Use Disorder Outpatient Services-Office	\$15	\$15	\$20***
Emergency/Urgent Care Services			
Emergency Care Services	\$450	\$800	\$800
Urgent Care	\$35	\$35	\$45
Ambulance	\$375	\$375	\$375
Outpatient Services			
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)	\$350	\$350	\$600
Outpatient Surgery Physician/Surgical Services	\$75	\$75	\$200
Mental/Behavioral Health and Substance Use Disorder Outpatient Services - Other	\$15	\$15	\$30
Outpatient Diagnostic Tests			
Laboratory Outpatient and Professional Services	\$20	\$30	\$35
X-rays and Diagnostic Imaging	\$30	\$30	\$40
Advanced Imaging (CT/PET Scans, MRIs)	\$300	\$300	\$300
Inpatient Services			
All Inpatient Hospital Services (inc. MH/SUD, Maternity)	\$525*	\$650*	\$800*
Skilled Nursing Facility	\$350**	\$350**	\$800**
Pharmacy			
Generics	\$10	\$10	\$20
Preferred Brand Drugs	\$60	\$75	\$75
Non-Preferred Brand Drugs	\$100	\$200	\$250
Specialty Drugs (i.e. high-cost)	\$100	\$200	\$250
All Other Benefits			
Speech Therapy	\$25	\$30	\$35
Occupational and Physical Therapy	\$25	\$30	\$35
Durable Medical Equipment (DME)	20%	20%	20%
Home Health	\$15**	\$15**	\$30**
Hospice	\$15**	\$15**	\$30**
All Other Benefits	20%	20%	20%
AV	81.81%	78.06%	78.02%

Comparison: 2026 Silver to low Gold options

- ▶ Compared to 2026 approved Silver
 - ▶ Option 1 lowers the deductible by \$600 and lowers many cost shares
 - ▶ Option 2 lowers the deductible by \$1,000; Keeps many cost shares the same

Shaded items are not subject to deductible.

* Per day copay, maximum of five copays per stay

** Per day copay

*** Eligible for two visits at \$1 copay, after which stated cost-sharing applies

Benefits	Low AV Gold		
	2026 Approved Silver (Reference)	Option 1	Option 2
Deductible and Out-of-Pocket Maximum			
Medical/Pharmacy Integrated Deductible	Yes	Yes	Yes
Medical (or Integrated, if Applicable)/Pharmacy Deductibles (\$)	\$2,500	\$1,900	\$1,500
Medical/Pharmacy Integrated MOOP	Yes	Yes	Yes
Medical/Pharmacy Integrated MOOP (\$)	\$9,750	\$8,800	\$7,550
Office Visits			
Preventive Care/Screening/Immunization	\$0	\$0	\$0
Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)	\$20***	\$15	\$20***
Specialist Visit	\$65	\$40	\$45
Mental/Behavioral Health and Substance Use Disorder Outpatient Services-Office	\$20***	\$15	\$20***
Emergency/Urgent Care Services			
Emergency Care Services	\$800	\$800	\$800
Urgent Care	\$65	\$35	\$45
Ambulance	\$375	\$375	\$375
Outpatient Services			
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)	\$600	\$350	\$600
Outpatient Surgery Physician/Surgical Services	\$200	\$75	\$200
Mental/Behavioral Health and Substance Use Disorder Outpatient Services - Other	\$30	\$15	\$30
Outpatient Diagnostic Tests			
Laboratory Outpatient and Professional Services	\$40	\$30	\$35
X-rays and Diagnostic Imaging	\$65	\$30	\$40
Advanced Imaging (CT/PET Scans, MRIs)	30%	\$300	\$300
Inpatient Services			
All Inpatient Hospital Services (inc. MH/SUD, Maternity)	\$800*	\$650*	\$800*
Skilled Nursing Facility	\$800**	\$350**	\$800**
Pharmacy			
Generics	\$25	\$10	\$20
Preferred Brand Drugs	\$75	\$75	\$75
Non-Preferred Brand Drugs	\$250	\$200	\$250
Specialty Drugs (i.e. high-cost)	\$250	\$200	\$250
All Other Benefits			
Speech Therapy	\$40	\$30	\$35
Occupational and Physical Therapy	\$40	\$30	\$35
Durable Medical Equipment (DME)	30%	20%	20%
Home Health	\$30**	\$15**	\$30**
Hospice	\$30**	\$15**	\$30**
All Other Benefits	30%	20%	20%
AV	71.84%	78.06%	78.02%

Seeking Comment – Draft 2026 Bronze HSA and Low Gold AV Standard Plans

- ▶ Public comment is particularly welcomed in these areas:
 - ▶ Which option for each metal level will best help Exchange customers that are potentially facing significant premium increases stay covered and why?
 - ▶ Which Bronze HSA plan design offers the best low-premium option to customers losing access to federal subsidies?
 - ▶ If adopted, how might the Exchange mitigate choice error of customers only considering lowest premium when they would be better off (financially) in a different plan?
 - ▶ Balancing market overcrowding concerns with the desire to address the potential affordability cliff and to offer additional meaningfully different choice, should either the low-AV gold and/or bronze HSA standard plans be required for carriers to offer?
 - ▶ Are there any variables that were not presented that you believe would better address the goals of these potential additional standard plans?
- ▶ All other feedback is welcome

Public comment period: Jan. 9 – Jan. 29, 2025

- ▶ To provide public comment on the draft 2026 standard plans, either:
 - ▶ Submit written public comment by 5 p.m., Jan. 29, 2025:
 - ▶ Send an email to cascadecare@wahbexchange.org
 - ▶ Please include “Public Comment” in the subject line of your email
 - ▶ Attend the virtual public meeting and provide comment in the meeting:
 - ▶ Attend the virtual public meeting scheduled for 11:30 p.m., Jan. 29, 2025.
 - ▶ This virtual meeting will provide an opportunity for the public to provide comments regarding the proposed 2026 standard plan design options.
 - ▶ This meeting will be conducted via Teams
 - ▶ [Meeting Link](#)
- ▶ To request additional information about this meeting, or to request accessibility services, please email cascadecare@wahbexchange.org.

Appendix

Allowed AV Ranges by Metal

CMS Allowable Variation in AV Ranges

Metal	AV Range
Bronze	58%-62%
Expanded Bronze (includes pre-deductible benefit other than Preventive Care)	58%-65%
Silver	70%-72%
Gold	78%-82%

Source: [Final 2026 Actuarial Value Calculator Methodology](#)



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