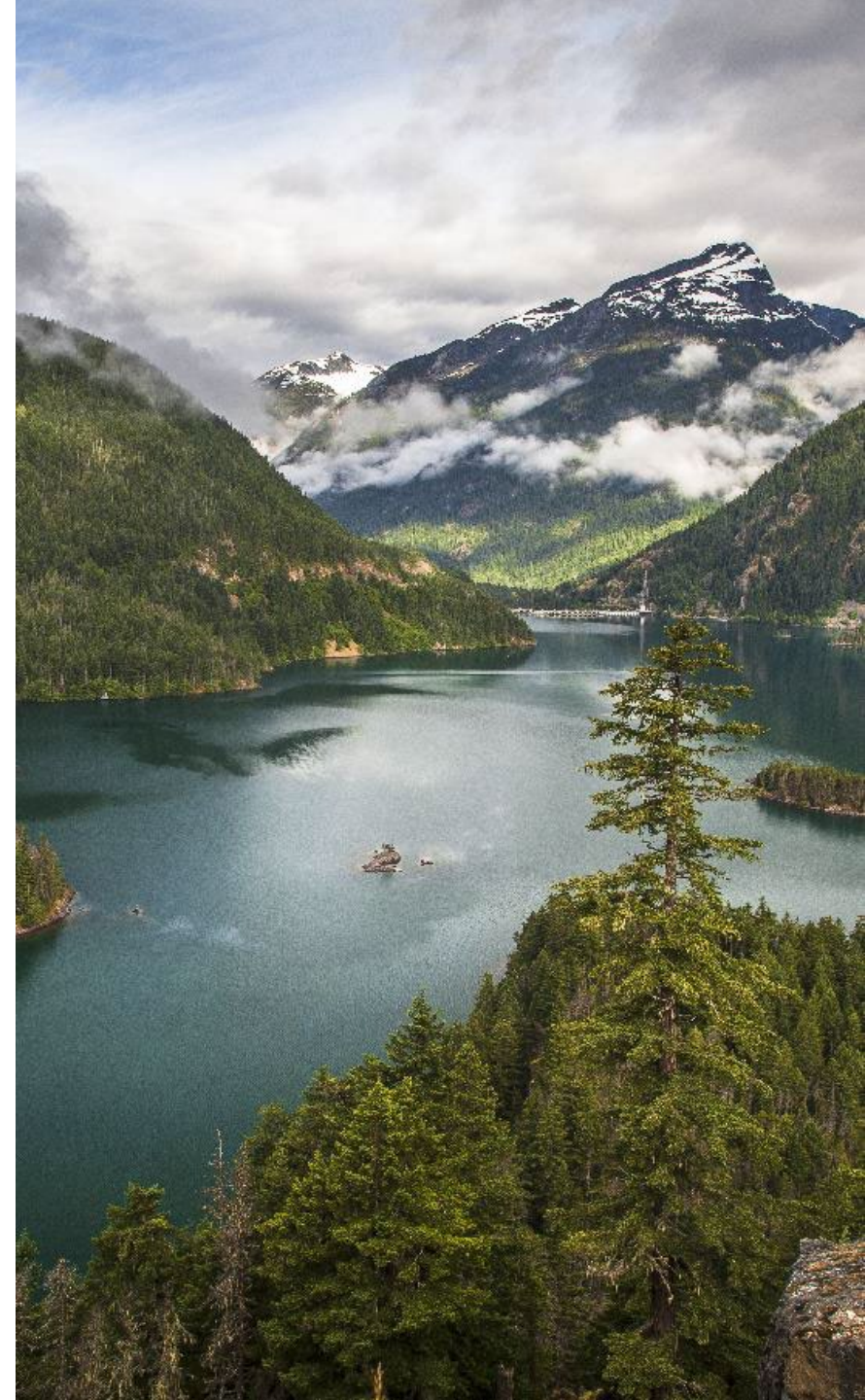


Federal Transition Planning

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Potential Federal Changes in 2025

1. Changes to reduce federal costs
2. Changes impacting equity
3. Changes impacting Exchange operations/market
4. Increased focus on program integrity



1. Potential Changes that Reduce Federal Expenditure

▶ Reduce Exchange tax credits

- ▶ Allow Enhanced APTC to Expire
- ▶ Lower APTC

▶ Reduce Exchange Enrollment

- ▶ Verification requirements
- ▶ FTR, PDM, or other/new checks added or frequency
- ▶ Special Enrollment Period limits – low income, other
- ▶ Open Enrollment timeframe shortened
- ▶ End silver loading
- ▶ Suspend risk adjustment payments

▶ Reduce Medicaid enrollment

- ▶ Work requirements
- ▶ Administrative barriers (rescind MAGI/Non-MAGI alignment rule)

2. Potential changes impacting equity

Challenges to WHABE's Equity Goals:

- ▶ **Immigrant Health Expansion changes**
 - ▶ Data protections
 - ▶ DACA+ Recipients receiving APTC - continuing to monitor active lawsuit
 - ▶ Waiver alternatives
- ▶ **Changes impacting equity initiatives**
 - ▶ Data collection and reporting changes in quality or other reporting
 - ▶ DEI limitations
 - ▶ 1557 Nondiscrimination (language access; nondiscrimination policies)
- ▶ **Changes to health services coverage**
 - ▶ Essential Health Benefit changes for reproductive care; end of life care; transgender care
 - ▶ 1557 Nondiscrimination protections

3. Potential Changes to Exchange Operations/Market

- ▶ Restrict administrative fees
- ▶ Restrict marketing
- ▶ Apply tax credits off exchange/Direct Enrollment
- ▶ Limit employer penalty or changes to employer incentives

4. Potential increased focus on program integrity

- ▶ **Increase focus on program integrity and audits**
 - ▶ Review for improper payments;
 - ▶ Additional data requests or Audits
 - ▶ Potential Corrective Action Plans
- ▶ **Duplicate Coverage**
 - ▶ Awaiting GAO report
 - ▶ Fraudulent enrollment in \$0 plans
- ▶ **Review of spending**
 - ▶ Allocation; appropriateness; changes to system funding