



Upcoming Marketplace Changes 2025-2026

Covering Wisconsin

October 8, 2025

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covering
Wisconsin
Connect to Care, Engage in Health

Introductions



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Agenda

1. Covering Wisconsin Refresher
2. Navigator Program Updates
3. Policy Topics
 1. Final Rule Updates
 2. Enhanced Premium Tax Credits
 3. OBBBA (Budget Reconciliation Bill)
4. Question and Answer

What We Do

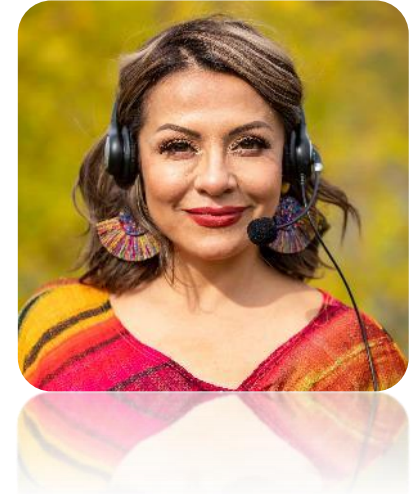


Covering Wisconsin:

Covering Wisconsin (CWI) is a grant and contract-funded program of UW-Extension that helps people in Wisconsin **find and use health insurance**.

Health Insurance Navigators:

A Navigator entity since 2014, our expert health insurance Navigators are federally-licensed to provide free help statewide.



Education, Outreach and Promotions

Our team creates consumer-tested materials and offers training for professionals and partners on health insurance topics.

Covering Wisconsin Health Insurance Navigators

Health Insurance Navigators provide free help anytime to:

- Understand your health insurance questions, big or small.
- Find plans and financial help on HealthCare.gov.
- Sign up for HealthCare.gov, BadgerCare Plus, or other Medicaid programs.
- Find community programs to help pay for insurance or medical care.



Preparing for HealthCare.gov Open Enrollment

- HealthCare.gov Open Enrollment this year will be **November 1, 2025 – January 15, 2026**.
- Starting next year, Open Enrollment will be shortened to November 1, 2026 – December 15, 2026.
- You can sign up during special circumstances throughout the year, but many people need to enroll during Open Enrollment to gain coverage.



Navigator Program Updates

Funding Transitions after August 26, 2025

Effective August 26, 2025, a significant federal funding reduction affected the Navigator program.

There has been or will be:

- A 90% decrease in federal funding
- Fewer Navigators across Wisconsin (from 41 Navigators to 17 Navigators)
- A need to focus on HealthCare.gov enrollments during Open Enrollment (above Medicaid applications or renewals)

Navigator Appointment Availability

Due to the changes with subaward agencies, here is what to know about Navigator appointment availability:

- Covering Wisconsin will still serve statewide through phone and video appointments.
- Dane County will have in-person appointments available during Open Enrollment. Please contact us for in-person requests.
- There may be longer wait times for appointments, especially during Open Enrollment. We encourage people to schedule early!

Plans for 2025-26 Open Enrollment Period

From November 1, 2025, to January 15, 2026, Covering Wisconsin will prioritize Marketplace enrollments over Medicaid, due to reduced capacity.

To accomplish this while best supporting Wisconsin residents, we will:

- Assist mixed-eligibility families (e.g., if children qualify for Medicaid while parents do not).
- Leverage partnerships across the state to assist with Medicaid applications.
- Direct consumers to access.wi.gov or the consortium when appropriate.
- Schedule Medicaid enrollments after Open Enrollment, as long as no gap in coverage.

Policy Topics: Final Rule Updates

Marketplace (HealthCare.gov) Policy Updates

Three reasons for noteworthy changes this Open Enrollment:

- The 2025 Marketplace Integrity & Affordability Final Rule
- The Budget Reconciliation Bill (OBBBA)
- Whether Congress extends enhanced premium tax credit subsidies

The Final Rule Updates

The Centers for Medicare & Medicaid Services (CMS) released [a final rule](#) on June 20, 2025—the Marketplace Integrity and Affordability Final Rule.

- Most of the policies were meant to go into effect on August 25, 2025.
- The final rule has been challenged in *City of Columbus v. Kennedy*, leading to a stay (“pause”) on **some** provisions in the final rule.
- Some changes had an expiration date of December 31, 2026, because a similar or related policy was included in the Budget Reconciliation Bill in Congress which will start to be implemented in 2027.

Final Rule Changes in Effect: Part One

These provisions in the final rule continued as planned:

- DACA recipients do not qualify for Marketplace coverage.
- The Low-Income Special Enrollment Period (SEP) was eliminated. Those 100-150% FPL need to qualify for another SEP to enroll outside of Open Enrollment.
- Starting 2026-27, Open Enrollment will be November 1 – December 15.
- States cannot include sex-trait modification services (gender-affirming care) as an Essential Health Benefit (EHB). Remember: Gender-affirming care was not an EHB in Wisconsin.

Final Rule Changes in Effect: Part Two

These provisions in the final rule continued as planned:

- Consumers have 90 days to submit income verification documents, instead of 150 days.
- The standard of proof was adjusted for terminating Marketplace agreements with agents, brokers, and web brokers.
- A consumer enrolled in a Bronze plan cannot be automatically reenrolled into a Silver plan.

Paused Final Rule Provisions: Part One

These provisions in the final rule were **paused**:

- Those automatically reenrolled into \$0 premium plans have a \$5 fee.
 - Because automatic reenrollments end in 2027 due to OBBBA, the \$5 fee may never happen.
- Plans can require payment of past-due premiums as a condition for enrollment.
- Additional documentation requirements for income and some Special Enrollment Periods (SEPs).
 - The loss of coverage SEP still requires verification documents.

Paused Final Rule Provisions: Part Two

These provisions in the final rule were **paused**:

- Loss of premium tax credits after failure to reconcile after 1 year. The current rule is 2 consecutive years.
- Changes to actuarial value standards (allows less generous plans).

Policy Topics: Enhanced Subsidies

Enhanced Premium Tax Credits

Premium tax credits help you pay for some or all of your monthly premiums for health insurance. The less you make, the more credits you can get.

- *Enhanced* premium tax credits refers to the additional subsidies to the Marketplace that occurred during the pandemic, which are set to expire at the end of 2025.
- Even if enhanced premium tax credits are not extended in 2026, **premium tax credits still exist.**

Enhanced Premium Tax Credit (PTC) Subsidies

- Enhanced premium tax credits for the Marketplace have not been extended past 2025.
- If they are not extended, then households above 400% FPL won't qualify for premium tax credits in 2026.
- Congress will have to expand the enhanced Marketplace subsidies for households over 400% FPL to qualify for PTCs in 2026.
- PTC eligibility could decrease—increasing costs—for anyone, not only for those over 400% FPL.

Comparing Costs

The Kaiser Family Foundation has a [calculator](#) to compare estimated costs based on whether enhanced premium tax credits are extended.

Example – Household at 200% FPL in Dane County:

	With enhanced premium tax credits	Without enhanced premium tax credits
Estimated financial help	\$926 per month (\$11,117 per year) as a premium tax credit. This covers 93% of the monthly costs for a silver plan.	\$764 per month (\$9,171 per year) as a premium tax credit. This covers 77% of the monthly costs for a silver plan.
The most you have to pay for a silver plan	2% of income for the second-lowest cost silver plan	6.6% of income for the second-lowest cost silver plan
Your cost for a silver plan	\$71 per month (\$846 per year) in premiums (which equals 2% of your household income)	\$233 per month (\$2,792 per year) in premiums (which equals 6.6% of your household income)
Your cost for a bronze plan	\$0 per month (\$0 per year) in premiums (which equals 0% of your household income)	\$0 per month (\$0 per year) in premiums (which equals 0% of your household income)

Reasons for Possible Cost Increases

The Kaiser Family Foundation shared [a new analysis](#) of why ACA Marketplace premiums could increase in 2026:

- Potential end to enhanced subsidies
- Increasing cost of care and use of care
- Inflation
- Labor costs amid a health care labor shortage
- Tariffs
- Final rule's changes to actuarial values (currently paused)
- Potentially reduced funding for Cost-Sharing Reductions (for low-income populations)
- Limited competition for certain insurers due to mergers and provider consolidation
- Growing demand for GLP-1 and specialty drugs

Policy Topics: OBBBA

2026 HealthCare.gov Immigrant Eligibility Changes

- Currently, this population qualifies for coverage on HealthCare.gov with financial help:
 - Lawfully present
 - Within 5-year waiting period for Medicaid
 - Denied Medicaid based on immigration status
 - Under 100% FPL
- Starting in 2026 (i.e., this Open Enrollment), anyone under 100% FPL will not qualify for financial help on HealthCare.gov, even if they are denied Medicaid based on immigration status.
- This population will have to pay full price for HealthCare.gov coverage.

Tax Year 2026: End to Repayment Caps

Starting Tax Year 2026, people whose actual income is higher than their projected income will owe back **all** the excess premium tax credits that they received.

- It will be especially important to accurately estimate income this Open Enrollment.
- Consumers will feel the effect of this in 2027, when filing taxes for 2026.

PREVIOUS REPAYMENT LIMITS (TY 2025)		
Income (as % of FPL)	SINGLE taxpayers will pay back no more than ...	OTHER taxpayers will pay back no more than....
Under 200%	\$375	\$750
At least 200% but less than 300%	\$975	\$1,950
At least 300% but less than 400%	\$1,625	\$3,250
400% and above	None: Full repayment	None: Full repayment

Source: Center on Budget and Policy Priorities

Visit:
<https://coveringwi.org/conference25>
to watch the session recordings,
including the HealthCare.gov Policy
Deep Dives, featuring Jenny Sullivan
from the Centers on Budget and Policy
Priorities.



How to Find Free, Local Help



Find & Schedule Online

www.CoveringWI.org/enroll (Spanish:
www.coveringwi.org/salud)



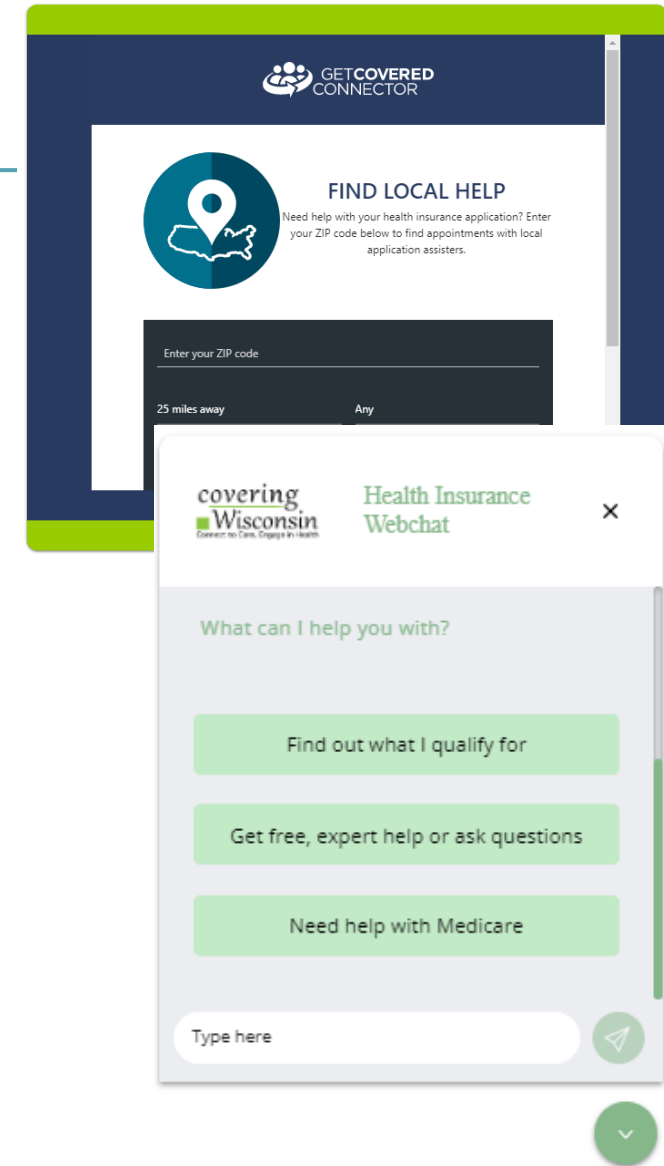
Call

- Covering Wisconsin: 877-947-2211
- 211 Helpline or to find a local enrollment assister



Webchat

- Online at www.CoveringWI.org from 9am-4pm Monday-Friday





Question and Answer

Contact Us

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