



HC4ME 2025 – Updates from CoverME.gov

October 7, 2025

The background of the slide is a solid olive green. It is decorated with a series of wavy, horizontal lines in various shades of green, ranging from light lime to dark forest green. Interspersed among these lines are small, semi-transparent dots in similar shades, creating a textured, organic feel.

Policy Updates

Federal Changes to Health Insurance Marketplaces

June 25, 2025

The Center for Medicare and Medicaid Services (CMS) issued the Marketplace Integrity and Affordability Rule, setting new requirements for federal and state Health Insurance Marketplaces.

August 22, 2025 Stay on provisions of the CMS rule due to ruling in City of Columbus v. Kennedy

July 4, 2025

Congress passed the “One Big Beautiful Bill Act” (H.R. 1). Like the CMS Final Rule, H.R. 1 includes provisions to tighten eligibility and marketplace enrollment requirements.

December 31, 2025

Enhanced Premium Tax Credits are set to expire without congressional action.

Recent Federal Changes to Maine's Health Insurance Marketplace

Key:



2025 Implementation

CMS.gov

Provision in CMS Marketplace
Integrity and Affordability Final Rule



2026 Implementation



Provision in HR 1 (2025
Federal Budget Reconciliation Act)



2027 Implementation



Provision sunsets December 31, 2026



2028 Implementation



Enhanced Premium Tax Credits Expire

August 25, 2025



Deferred Action for
Childhood Arrivals (DACA)
recipients are no longer
eligible to enroll in
marketplace coverage

October 24, 2025



Special Enrollment Period (SEP) no
longer available for individuals with
household income less than or
equal to 150% of Federal Poverty
Level (FPL)

December 31, 2025
Enhanced Premium
Tax Credits Expire

January 1, 2026

CMS.gov



Individuals must have filed
federal income taxes with
the IRS within the last year
to receive future advanced
premium tax credits*



Those who have income below
100% FPL and are in the five-year
Medicaid waiting period (due to
immigration status) no longer
eligible for premium tax credits



Premium tax credits no longer
available for individuals
enrolled in an SEP based on
income and events not
specified by HealthCare.gov



Individuals must pay back the
full amount of excess premium
tax credits received in the prior
year (likely beginning in 2027
with credits received in 2026)



All bronze and
catastrophic plans sold
through the marketplace
are HSA eligible.

November 1, 2026



Open enrollment shortened
(reduces open enrollment to a
maximum of 9-weeks)

January 1, 2027



Individuals who are otherwise
eligible for Medicaid, but do not
meet the community engagement
requirements, are not eligible for
premium tax credits for
Marketplace coverage



Many lawfully present
immigrants no longer
eligible for premium tax
credits

January 1, 2028



Individuals who receive APTC must
actively verify household income and
family size, immigration status,
eligibility for coverage, and place of
residence; eliminates annual auto-
reenrollment and conditional eligibility

* = Provision is stayed pending resolution of City of Columbus v Kennedy

Plan Year 2026 – Implementation Plans

Implemented for PY 2026

DACA Recipients are no longer eligible for QHPs through CoverME.gov.

Income-based SEPs are no longer available.

Under 100% FPL with lawfully present status no longer eligible for financial savings.

APTC repayment cap is removed.

All Bronze and Catastrophic plans are eligible for HSAs.

Implementation Stayed or Delayed

One-Year Failure to Reconcile status resulting in APTC loss (all FTR action stayed by City of Columbus v Kennedy case).

Removal of self-attestation for income DMIs (stayed by City of Columbus v Kennedy).

Elimination of additional 60-day verification window for income DMIs (OHIM has informed CMS August 25 implementation is not feasible).

EXPIRATION OF EPTC - CASE STUDIES

Case Study: Kittery



Family of four in Kittery with annual household income of \$100,000 enrolled in a Silver plan

- Full cost: **\$1,835/month**
- Premium(with EPTC): **\$523/month**
- Premium (without EPTC): **\$830/month**
- Premium Difference: **\$307 / month (58% increase)**

Case Study: Lisbon



Family of five in Lisbon with annual household income of \$120,000 enrolled in a Silver plan

- Full cost: **\$2,344/month**
- Premium (with EPTC): **\$647/month**
- Premium(without EPTC): **\$996**
- Premium Difference: **\$349 / month (54% increase)**

Case Study: Bangor



Family of two in Bangor with annual household income of \$50,000 enrolled in a Silver plan

- Full cost: **\$1,256/month**
- Premium (with EPTC): **\$144/month**
- Premium (without EPTC): **\$331**
- Premium difference: **\$187 / month (130% increase)**

EPTC – EXPIRATION V EXTENSION

- *EPTC is set to expire after December 31, 2025*
 - Without Congressional action to extend EPTC, more than 20% of the average CoverME.gov consumer's savings will be eliminated for Plan Year 2026, resulting in a **more than doubling of average premiums year-over-year** for households that receive tax credits.
- *If Congress Extends EPTC...*
 - If EPTC is extended but the formula for eligibility is updated, CoverME.gov may not be able to make necessary system updates ahead of the Open Enrollment Period
 - If Congress acts to extend EPTC in October, CoverME.gov can make necessary updates ahead of the Open Enrollment Period, but will need to forgo typical comprehensive system testing – creating additional risk for consumer experience and communications
 - If EPTC is extended after November 1, CoverME.gov will implement as quickly as possible. However, there will be risk of system bugs due to inadequate testing time, as well as consumer confusion. Notices will be reissued.
 - CoverME.gov is considering extending the Open Enrollment Period, or offering consumers special enrollment periods if Congress extends EPTC once Open Enrollment has already kicked off

Updates for Catastrophic and Bronze Plans

For PY 2026, hardship waivers for catastrophic plans will be newly available to those earning less than 100% FPL or over 250% FPL.

- Those under 30 will still be eligible, as well as those who qualify for hardship waivers due to life circumstances
- Applications for hardship waivers will still be processed through the FFM
- Anthem and CHO are the carriers offering catastrophic plans for PY 2026, HPHC will no longer have these plans available
- With an expanded risk pool, premiums for catastrophic plans are rising significantly in 2026

For PY 2026, all bronze and catastrophic plans are HSA eligible

- Bronze plans with pre-deductible coverage are now HSA-eligible
- Catastrophic plans now HSA-eligible

SIGNIFICANT TAX IMPLICATIONS FOR CONSUMERS

- Starting in 2026, it is more important than EVER that consumers **update income with CoverME.gov at least quarterly** *especially if their household income is variable, unpredictable, or has changed*, to avoid large, possibly unexpected federal tax bills

Elimination of repayment limits

- Starting in Plan Year 2026, households with incomes higher than anticipated will have to repay the entire amount of any excess APTC they received, rather than a capped portion.
 - Likely impacts consumers in Q1 2027 when file federal income taxes for 2026
 - If a person's actual income falls below 138 percent FPL, they remain protected from repaying APTCs

Expiration of EPTC

- Largest tax implications are on those just under 400% FPL
- If receive APTC and actual income is above 400% FPL, the household will need to repay the entire amount of APTC they received during the plan year

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COMMUNICATIONS UPDATES

Communication to Consumers for OE 2026

- **CoverME.gov Email/Outbound Call/Postcard Communication (August - October)**
 - Income End Dates of December 31st will impact Auto-Renewals and APTC
 - Prepare for Rate Changes and Account Updates
 - Account updates needed to re-enroll
 - IRS consent needed
 - Financial application missing information
 - Transfer to MaineCare for eligibility determination
 - Encourage active shopping; age outs; silver CSR eligibility
 - Cancels; EPTC eligible, as appropriate

Communication to Consumers for OE 2026 (cont.)

Carrier Communication (Mid-Late October)

- CMS required Plan Renewal Letter informing consumers of prices if current plan was renewed

CoverME.gov Auto-Renewal Notice (October 21st-23rd)

- Notice they are eligible for auto-reenrollment if they make no changes before December 15th

CoverME.gov Redetermination Notice with Cost Estimates (November 1st)

- Notice of Plan Year 2026 plan cost estimates, monthly premiums and APTC, based on current enrollment

Consumer Messaging

"A Plan that fits. Support you can count on."

- Prioritizing trust in CoverME.gov and partners.
 - ❖ Frequent pre-OE communications encouraging consumers to read updates from CoverME.gov – fighting confusion and misinformation
- Leaning into assister, broker, and navigator networks to help consumers through an uncertain open enrollment period.
- Moving away from price-centered messaging
- Increased focus on health insurance literacy



A screenshot of the CoverME.gov website. The top navigation bar includes links for HOME, LEARN, SHOP, SUPPORT, and SIGN IN. The main content area is titled "OPEN ENROLLMENT IS COMING SOON" and includes a video player for "YOUR ROADMAP FOR 2026". The roadmap shows a timeline from October 15 to January 15, with key events like "Preview 2026 health and dental insurance plans online", "Renewal notices sent", "Open Enrollment begins", and "Deadline for 1/1/26 coverage". A sidebar on the right features a video titled "OPEN ENROLLMENT IS COMING" and a section for "Price Changes Expected".

Audience-Specific Messaging

- Different messaging for member retention and new consumer recruitment
- Healthcare providers are #1 trusted resource for consumers and members

	UNINSURED	MAINECARE	COVERME.GOV
UNMET WOMEN'S HEALTH NEEDS	83%	37%	29%
MESSAGING	Life trigger events	Tangible value and security	Balancing cost and coverage

- Plain language – “Words that us normal people can understand”
- Provide information where they already are – e.g., provider offices, grocery store, schools, libraries, etc.

OE 2026 PARTNER TOOL KIT

- Resources include flyers, posters, social media posts, newsletter copy, and digital signage with several pieces translated into multiple non-English languages (Arabic, French, Lingala, Portuguese, Somali, Spanish)
 - English version available now
 - Translated version coming soon
- Includes Frequently Asked Questions to help answer consumer questions



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QUESTIONS & DISCUSSION