

HealthCare.gov Marketplace Updates

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AI/ANs with a Marketplace plan for 2025

	<u>Oklahoma</u>	<u>Texas</u>
AI/AN plans	35,506	7,968

For all consumers		
Average APTCs	\$558/mo	\$592/mo
Avg premium	\$46/mo	\$58/mo
Rural zip code	43%	14%

Marketplace Premiums for PY2026

Current “enhanced APTCs” expire 12/31/25.....Congressional action needed

Consumer’s “required contribution percentage” goes back up

...Fewer \$0 premium plans...

No APTCs if income over 400%FPL

Renewal letters from plan will not mention a premium price

Encourage shopping and active re-enrollment (not auto-renewal)

Plans can change features, but keep same name & price

Watch for \$5 bill in Jan. on \$0 premium plans...must be paid to keep plan

.....avoid this with active re-enrollment and update of application

Marketplace Plans for PY2026

How many insurance companies for PY2026?

Insurers can choose which counties they offer plans in...

When just 2 insurers in a county...then maximum APTCs

Premiums can be different in 5 pricing (“rating”) areas in Oklahoma

When shopping for plans, enter the name of preferred providers, hospitals

Consumers can see the premium cost differences for plans are often related to which hospitals are “in-network”

A \$0 premium plan may not have local or preferred providers, specialists

Open Enrollment Period and Plan Changes

For PY 2026

Nov 1, 2025—Jan 15, 2026

For PY 2027

Nov 1, 2026—Dec 15, 2026

Encourage shopping and active choice of plan each year

Update MP application to confirm income and tax filing

Avoid mid-year plan changes that re-start deductible, MOOP, etc

Tribal Member SEP Continues

New rules do apply to Tribal Member

Insurers can require payment of past-due premiums before starting a 2026 plan...insurers can “look-back” many years

Tax return “failure to reconcile” (FTR) APTCs applies each year

Tax form 8962 must have been filed for tax years 2023 and 2024,

...or no eligibility for APTCs for PY2026

Be ready to upload tax returns; encourage on-time tax filing

New rules apply to Tribal Members

.....More about Tax Returns.....

APTC Repayment Limits Eliminated

Current: APTC repayment limit based on final FPL%...(\$375/\$750,etc.)

New: Full APTC Repayment of excess amount when actual income is higher than income on MP application

.....unless actual income is under 138%FPL (Okla.) or 100% FPL (TX)

New rules apply to Tribal Members

When SEP Verification documents required (SEP-V)

MP does not send info to insurer until after SEP-V completed

Only 30 days to send SEP-V docs to MP

Data Matching Issues (DMI)

Watch for more requests to verify income, household size, etc.

.....and shorter deadlines to upload documents

When no documents uploaded in-time

Watch for loss of APTCs.....but plan continues at full premium

.....leading to insurer “look-back” at unpaid premiums when re-starting a new plan

SEP Verification

<https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/#indian-status>

Documents to confirm American Indian or Alaska Native status

- Tribal Enrollment/Membership card from a federally recognized tribe
- Document issued by Bureau of Indian Affairs (BIA) recognizing you as American Indian/Alaska Native
- Authentic document from a federally recognized tribe declaring your membership
- Certificate of Degree of Indian Blood
- Certificate of Indian status card
- I-872 American Indian Card (Texas and Oklahoma Kickapoo American and Mexican members)
- Document issued by Indian Health Service (IHS) showing that you were/are eligible for IHS services as an American Indian/Alaska Native
- U.S. American Indian/Alaska Native tribal enrollment or shareholder documentation
- Letter from the Marketplace granting a tribal exemption based on tribal membership or Alaska Native shareholder status

DMI Verification -- Income

<https://www.healthcare.gov/help/how-do-i-resolve-an-inconsistency/>

Documents to show:

Income.....Self-employment income.....Other income

Or, complete a written explanation form

Filing taxes important for income proof, and eligibility for APTCs for the next year

<https://www.cms.gov/marketplace/outreach-and-education/household-income-data-matching-issues.pdf>

<https://www.healthcare.gov/downloads/annual-income-letter-explanation.pdf>

Marketplace checks for Medicaid enrollment

Marketplace Periodic Data Match (PDM)

Marketplace checks list of Medicaid recipients (semi-annual)

If someone is on Medicaid, also.....Marketplace sends letter

30 days to resolve issue

...or Marketplace APTCs end (plan is not ended)

Marketplace AI/AN Special Protections

**Marketplace “anytime” SEP applies to whole household,
including non-AI/AN members of that tax household**

**Marketplace Zero Cost-Share (ZCS) and Limited Cost-Share (LCS) plans
apply only to AI/AN members (not non-AI/AN consumers in the household)**

**ZCS available up to 300%FPL based on total household income
(not just income for AI/AN members in household)**

.....300%FPL dollar amount will update Nov. 1, 2025 for Marketplace

Transitions *to or from* Marketplace

From SoonerCare (Medicaid) to Marketplace

From Employer Plan to Marketplace

From COBRA to Marketplace

Changing residency state in Marketplace

From Marketplace to Medicare

Consumers may need clarification.....

When do AI/AN special protections apply to

...the whole household? (both AI/AN and non-AI/AN members)

or

...to individual AI/AN members? (and not to non-AI/ANs)

Examples from Marketplace.....different than Medicaid?

What's helpful for what's coming next?

Questions you have to better assist people in the next few months?

Questions consumers will likely ask in the next few months?

Thanks! Keep in touch.....
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Knowledge Check #1

The Marketplace Open Enrollment period will be.....

Nov 1—Dec 15 for 2026 plans

Nov 1—Jan 15 for 2027 plans

True or False?

Knowledge Check #1

The Marketplace Open Enrollment period will be.....

Nov 1—Dec 15 for 2026 plans

Nov 1—Jan 15 for 2027 plans

False....it's actually a longer period for 2026....shorter for 2027

Nov 1—Jan 15 for 2026 plans

Nov 1—Dec 15 for 2027 plans

Knowledge Check #2

Repayment limits on excess APTCs for plan year/tax year 2026 are.....

(A) \$375/\$750 (single/married)

(B) \$1000/\$2000

(C) No repayment limit—all excess APTCs must be re-paid

Knowledge Check #2

Repayment limits on excess APTCs for plan year/tax year 2026 are.....

(A) \$375/\$750 (single/married)

(B) \$1000/\$2000

(C) No repayment limit—all excess APTCs must be re-paid

Correct answer: (C) Everyone must re-pay all excess APTCs

This is not a “penalty” – it’s matching actual income vs. income on MP application

Keep updating income on MP application to re-calculate APTCs

Knowledge Check #3

Marketplace may require documents to prove AI/AN status.

What documents can be submitted?

(A) Only a Tribal ID plus CDIB card

(B) Only a Tribal ID plus IHS card

(C) Just one of 9 different documents is needed

Knowledge Check #3

Marketplace may require documents to prove AI/AN status. What documents can be submitted?

(C) Just one of 9 different documents is needed

Documents to confirm American Indian or Alaska Native status

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