

Understanding 2026 Marketplace Changes

What Federal and State Policy Shifts Mean for Colorado

Anneliese Steel, Senior External Affairs Manager
Rachel Peters, Manager of Policy Research and Implementation



Where are these changes coming from?

Federal

1. Passage of H.R. 1, “The Big Beautiful Bill”, on July 4th
2. Issuance of the final CMS Marketplace Integrity and Affordability Rule on June 20th
3. Expiration of enhanced Premium Tax Credits enacted under the American Rescue Plan and renewed under the Inflation Reduction Act

State

1. Health Insurance Affordability Enterprise Updates

PY 2026 Open Enrollment Will Look Different—Here's What You Need to Know

Changes Are Coming to the Marketplace

1. Without Congressional action, the savings from enhanced Premium Tax Credits are going away
2. New State-Supported Premium Assistance, "Colorado Premium Assistance" will be available
3. Who can and can't get help paying for coverage is changing, will particularly impact low-income immigrants.
4. The low-income Special Enrollment Period will end
5. Fewer financially assisted spots through OmniSalud
6. No changes to the length of the Open Enrollment period

Enhanced Premium Tax Credits are Expiring

Increased savings that helped drive access to affordable health insurance are coming to an end

- ePTC established under the American Rescue Plan and renewed under the Inflation Reduction Act expire 12/31/25 without Congressional action
 - APTC will return to pre-Covid levels
 - Return of the “400% FPL Cliff”
- Over \$420 million in annual assistance at risk for Colorado consumers

What Has ePTC Meant for C4HCO Customers

Customers in Denver County

- Average Monthly Subsidy - \$406
- Average Monthly Premium After Subsidy - \$122
- Subsidies Covered **77%** of Premiums for the Average Customer
- Average Annual Premium Savings Per Enrollee **\$4,877**

Customers in Mesa County

- Average Monthly Subsidy - \$466
- Average Monthly Premium After Subsidy - \$152
- Subsidies Covered **75%** of Premiums for the Average Customer
- Average Annual Premium Savings Per Enrollee **\$5,592**

Real Impact: Larimer County Couple Without Enhanced Tax Credits:*

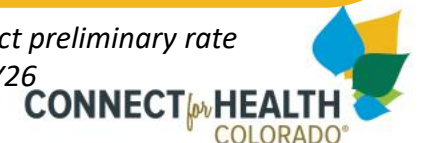
Couple earns \$81,761/year (just over the 400% FPL mark)

Monthly premium will jump from \$186 to \$1,641

Annual cost increases by \$18,460 (a 780% increase)

The cost of premiums are expected to rise from 8.5% of household income to 22.6% of household income.

**Does not reflect preliminary rate increases for PY26*



State Sponsored *Colorado Premium Assistance*

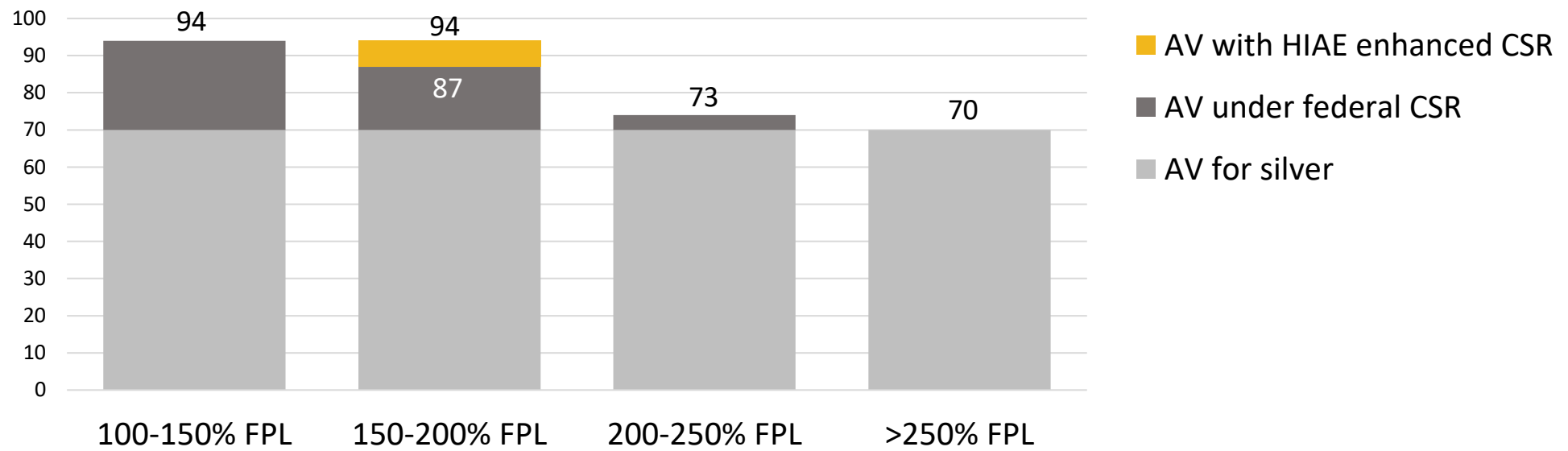
A new source of financial help to support Coloradans with incomes <200% FPL who are otherwise APTC eligible

- Funded by the Health Insurance Affordability Enterprise
- Flat rate =
 - \$50 per month for the first household member
 - \$18 per member per month for each subsequent household member
- Is not a tax credit, so does not need to be repaid or reconciled at tax time.
- *Could benefit approximately 57,000 current customers*

Cost Sharing Reductions (CSR) return to federal levels

To fund Colorado Premium Assistance (CPA), HIAE will no longer fund state-enhanced CSR, CSR will return to federal levels

Actuarial Value for silver plans with CSR



Who Can and Can't Get Help Paying for Coverage Is Changing

Starting August 25, 2025:

- Deferred Action for Childhood Arrivals (DACA) recipients will lose eligibility for Marketplace coverage and subsidies
 - *This impacts <100 current enrollees*
- Connect for Health Colorado will send communication and partner with Assisters and Brokers to provide support to impacted enrollees
- Colorado Connect remains an option. Will share other resources as well.

Additional Restrictions for Immigrant Populations

Lawfully present Coloradans who are ineligible for Medicaid due to immigration status will lose PTC eligibility **if they have an income under 100% FPL**

- This includes lawfully present Coloradans subject to the **five-year bar**
 - *This impacts approximately 1,800 current enrollees*

Fewer SES Spots on Colorado Connect

- OmniSalud spots are expected to reduce from 12,000 in 2025 to an estimated 3,000 spots in 2026
 - Expected that these spots will be available to a subset of existing customers
 - More specifics will be outlined at August 22 HIAE Board meeting
 - Full-price Colorado Connect plans are still an option. Connect for Health Colorado will share other resources as well to support transitions.

End of the Low-Income SEP

- Currently, APTC-eligible Coloradans with incomes <150% FPL are eligible for a special enrollment period allowing them to enroll *during any month*.
- Connect for Health Colorado will share updates on timing for removal of the SEP.

Additional Changes for 2026

1. Exchanges must create manual verification requests (MVRs) when tax data is unavailable
2. Exchanges must create MVRs if a customer has failed to reconcile taxes within 1 year (change from 2 years)
 - Regulation only applies to 2026 before sunseting
3. Income MVRs must be satisfied within 90 days (removal of an additional 60-day extension)

Changes for 2027 and Beyond

1. Additional Restrictions for Immigrant Populations
 - In **2027**, additional lawfully present immigrants—including refugees, asylees, and trafficking survivors—will be ineligible for financial assistance on-Exchange
2. Open Enrollment changes
 - Open enrollment dates may need to change in **2027**
3. Pre-enrollment verification for APTC
 - Beginning **2028**, customers will no longer be able to receive provisional financial help before satisfying all manual verification requests
 - Currently, customers can receive provisional APTC for up to 90 days while documents are requested and verified
4. Denials for Medicaid work requirements
 - Beginning **2027**, customers will not qualify for tax credits if they are denied Medicaid for failure to meet work requirements

What Are We Doing

1. Actively engaging with federal lawmakers who could still extend ePTC
2. Working closely with brokers, assisters, community partners, and customer service representatives to ensure customers are supported throughout these changes
 - Additional communications are in development
3. Shifted product and development approach to allow for more flexibility and narrowed focus

How to Support Customers

Open Enrollment is More Important Than Ever

Encourage Customers:

- File their taxes and reconcile past tax credits (Form 8962)
- Be ready to provide income and immigration documentation (on-Exchange only)
- Use assisters, brokers, and our Customer Service Center for help
- Shop plans to understand their options



Thank You

Questions? Let's work together to ensure every Coloradan understands their options and stays covered.