

ACA MARKETPLACE

Substantive changes in the ACA Marketplace during the 2025-2026 Open Enrollment Period (OEP)



- ▶ Expect higher limits on total out-of-pocket costs, including for those who are enrolled in employer-sponsored plans and those with cost-sharing reductions.
- ▶ Expect increases in premiums due to changes to payment formulas and plans. *Costs will rise even if enhanced Premium Tax Credits do not expire.*
- ▶ Enrollees at or below 150% of the federal poverty level (FPL) may only receive premium tax credits or cost sharing reductions if they apply during the normal OEP (Nov 1, 2025 - Jan 15, 2026) unless they have a qualifying life event. Check your state's requirements to qualify for a special enrollment period (SEP).
- ▶ Gender-affirming care will no longer be an essential health benefit.

Immigration-related changes

Deferred Action for Childhood Arrivals (DACA) recipients are now ineligible for discounted ACA Marketplace coverage. DACA recipients may still enroll in an ACA Marketplace plan (without assistance) or may be eligible for other low/no-cost state insurance options.

Lawfully present immigrants with income below 100% FPL are ineligible for premium tax credits (PTCs) beginning January 1, 2026.

Open Enrollment for 2026 coverage begins on November 1, 2025 and ends on January 15, 2026. Individuals interested in enrolling in ACA Marketplace coverage should apply during this period. *Note that some states may have longer OEPs.*

Stay vigilant. New federal policies make it easier for people to lose their tax credits due to data matching issues.

Ensure information you provide, such as family size or income, is **accurate** and **matches** information provided to the IRS and Social Security Administration, especially for those with multiple sources of income or engage in gig work, seasonal work, or self-employment.

Although **automatic re-enrollment is still available**, there is now less time to resolve data matching issues. Enrollees should return to the Marketplace to update their household and income information and actively select a plan.



Visit APIAHF's ACA Marketplace Open Enrollment Webpage for key dates, updates, links, and a list of required documents.