

2025 Program Integrity Rule Overview, Part I



August 2025

This information is intended only for the use of entities and individuals certified to serve as Navigators, certified application counselors, or non-Navigator assistance personnel in a Federally-facilitated Marketplace. The terms “Federally-facilitated Marketplace” and “FFM,” as used in this document, include FFMs where the state performs plan management functions. Some information in this presentation may also be of interest to individuals helping consumers in State-based Marketplaces and State-based Marketplaces using the Federal Platform. This material was produced and disseminated at U.S. tax filer expense.

Agenda

- 2025 Program Integrity Rule Overview
- Open Enrollment Updates
- Removal of the 150% FPL SEP
- Reverse DACA Eligibility



2025 Program Integrity Rule Overview

- The “Patient Protection and Affordable Care Act; Marketplace Integrity and Affordability Final Rule” (2025 Program Integrity Rule) is a federal regulation designed to prevent improper enrollments and strengthen Exchange integrity.
- The 2025 Program Integrity Rule creates stronger protections for consumers by:
 - Preventing unauthorized enrollment changes
 - Adding verification safeguards
 - Strengthening Marketplace standards
- Primary rule provisions become effective August 25, 2025.



*This presentation focuses exclusively on Program Integrity Rule policies. The recently enacted P.L. 119-21 contains additional provisions that may interact with these policies but will not be covered in this presentation. Please refer to separate P.L. 119-21 guidance materials when they are made available.

Open Enrollment Updates

- Open Enrollment for PY 2026 will run from November 1, 2025, through January 15, 2026.
- Starting with PY 2027, the Open Enrollment Period (OEP) for Exchanges on the Federal platform will run from November 1, 2026, through December 15, 2026.
 - Exchanges on the Federal platform can adjust OEP dates within the rule's outlined parameters in future years as operational processes evolve.
- All Exchanges can set dates within set parameters:
 - All Exchanges must begin the OEP no later than November 1
 - All Exchanges must end the OEP no later than December 31
 - Not exceed nine (9) calendar weeks
 - All enrollments will start January 1



Open Enrollment Updates (Cont.)

Open Enrollment for Exchanges on the Federal Platform		
Plan Year	OE PY 2026	OE PY 2027
Dates	November 1, 2025 – January 15, 2026	November 1, 2026 – December 15, 2026
Duration	10.5 weeks	6.5 weeks

Removal of 150% FPL SEP

- Effective August 25, 2025, consumers with projected household incomes up to 150 percent of the Federal Poverty Level (FPL) will no longer be able to enroll in or change their health plans outside of Open Enrollment, except if eligible for a special enrollment period (SEP) due to qualifying life events.
 - A change in income is not considered “exceptional circumstances” and State-based Marketplaces may not offer income-based special enrollment periods to work around this rule.
- This change will be effective only for PY 2026.



Removal of 150% FPL SEP (Cont.)

150% FPL Special Enrollment Period REMOVAL EFFECTIVE AUGUST 25,2025 Will sunset at the end of PY 2026	
BEFORE August 25, 2025	AFTER August 25, 2025
<input checked="" type="checkbox"/> 150% FPL SEP-eligible consumers could enroll anytime	<input checked="" type="checkbox"/> 150% FPL SEP is not granted
<input checked="" type="checkbox"/> Income changes allowed plan switching	<input checked="" type="checkbox"/> Income changes NOT qualifying events

Reverse DACA Eligibility (Slide 1 of 3)

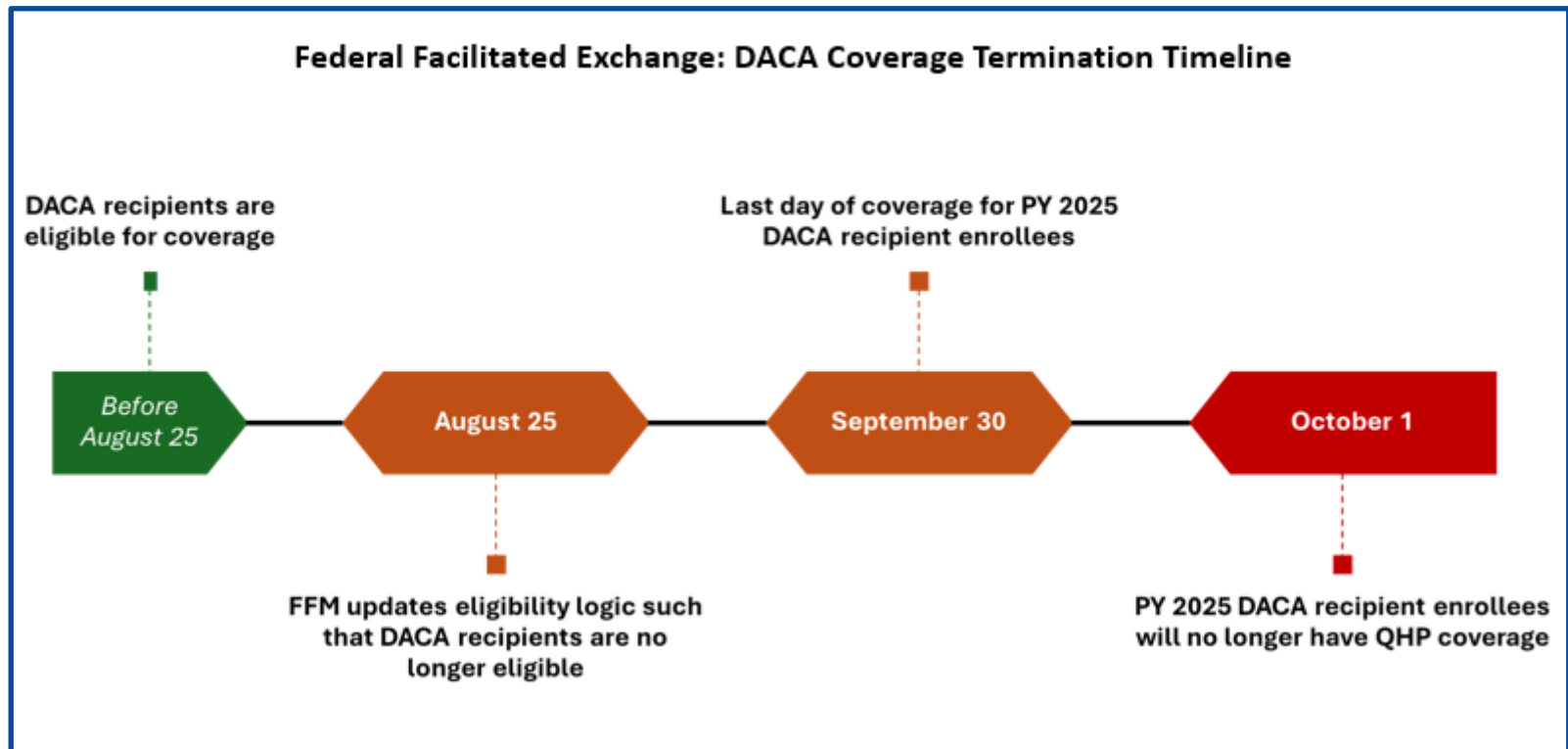
- As of August 25, 2025, DACA recipients will no longer be considered “lawfully present” for Marketplace purposes and cannot:
 - Enroll in Qualified Health Plans (QHPs) through the Marketplace
 - Receive premium tax credits or advance payments of the premium tax credit (APTC)
 - Get cost sharing reductions (CSRs) to lower out-of-pocket costs
 - Participate in Basic Health Programs (BHPs) in states that offer them
- The 2025 Program Integrity Rule retains the technical and clarifying changes made to the definition of “lawfully present” at § 155.20 in the 2024 DACA rule (89 FR 39392).

Reverse DACA Eligibility (Slide 2 of 3)

- DACA recipients will no longer be eligible to enroll starting August 25, 2025.
- For Marketplaces on the Federal platform, DACA recipients who are currently enrolled in plan year 2025 coverage will be terminated by October 1, 2025.
 - Impacted consumers will receive notices from the Marketplace informing them of cancelled coverage, their appeal rights, and alternate coverage options.
- State-based Marketplaces that do not use the Federal platform and BHP agencies will be responsible for terminating coverage for any DACA recipients currently enrolled in coverage (after the effective date of the rule) and conducting outreach to impacted consumers.



Reverse DACA Eligibility (Slide 3 of 3)



Resources

- 2025 Marketplace Integrity and Affordability Proposed Rule (CMS-9884-P): [CMS.gov/files/document/MarketplacePIRule2025.pdf](https://www.cms.gov/files/document/MarketplacePIRule2025.pdf)
- 2025 Marketplace Integrity and Affordability Proposed Rule Press release: [CMS.gov/newsroom/press-releases/cms-takes-aim-reduce-improper-enrollments-and-promote-more-affordable-health-insurance-marketplaces](https://www.cms.gov/newsroom/press-releases/cms-takes-aim-reduce-improper-enrollments-and-promote-more-affordable-health-insurance-marketplaces)
- 2025 Marketplace Integrity and Affordability Proposed Rule fact sheet: [CMS.gov/newsroom/fact-sheets/2025-marketplace-integrity-and-affordability-proposed-rule](https://www.cms.gov/newsroom/fact-sheets/2025-marketplace-integrity-and-affordability-proposed-rule)
- 2025 Program Integrity Rule Stakeholder Presentation: [Regtap.cms.gov/reg_librarye.php?i=5943](https://regtap.cms.gov/reg_librarye.php?i=5943)

Q&A

