

HighRoads Flash Briefing

Proposed Major Changes to ACA



Executive Summary

The administration proposed the reversal of several Affordable Care Act (ACA) provisions, aiming to reduce federal spending by \$11 billion. These changes may result in substantial drops in enrolled ACA membership in 2026, premium increases, and confusion about eligibility and enrollment timing and processes. Health plan leaders will need to assess how these shifts impact their ACA products, go-to-market, and operations to sustain this line of business.

High-level facts: What was proposed?

- Ending the monthly enrollment opportunity for low-income individuals.
- Shortening the annual open enrollment period by a month.
- Allowing insurers to require payment of overdue premiums before granting new coverage.
- Provisions about brokers, DACA recipients, eligibility, automatic enrollment, actuarial values premium adjustments. [Here is a link to the CMS draft.](#)
- Starting in 2026, the administration intends to remove mandatory coverage of gender-affirming care as an essential health benefit.

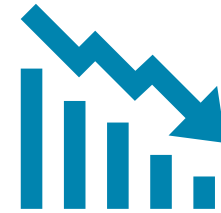
What does this mean for members?

- Potentially higher premiums
- A shorter and perhaps confusing enrollment window
- New questions about eligibility

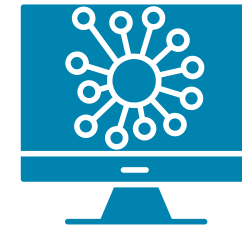
All the above could mean high call volume and long hold times for agents.

What Does This Mean for Leaders at Health Plans?

Lower than expected enrollment across the board. KFF estimates potentially a 25-30% decrease associated with subsidy reductions. Based on the substantial regulatory requirements of ACA and the associated cost structure, this drop would create disproportionate strains on financial results.



Scrambling. Leaders must assess their entire go-to-market and support strategies and evaluate whether their systems are ready for all this change.



Last minute changes to their products. Now is the time to have a firm foundation, a single source of truth, to power these last-minute updates.



What Does This Mean Short Term for Product Leaders at Health Plans?

- ✔ **Review Enrollment Strategies:** Assess and adjust enrollment processes to align with the proposed changes, including the potential reduction in enrollment periods and new premium payment requirements.
- ✔ **Evaluate Member Eligibility:** Reexamine eligibility criteria and member communications considering the proposed exclusion of DACA recipients from Marketplace coverage.
- ✔ **Monitor Regulatory Developments:** Stay informed about the finalization of these proposed rules and prepare for implementation to ensure compliance and minimize operational disruptions.
- ✔ **Focus on Efficiency:** Identify efficiency strains to mitigate potential financial impact of membership declines.
- ✔ **Prepare for Innovation:** Develop differentiated and target products to maintain market competitiveness and provide the best coverage members.
- ✔ **Ensure Compliance:** Modify plan designs and ensure the flexibility to adjust and align with the regulatory changes to avoid the risk of non-compliance.

What's your product team doing to prepare?

Schedule time with our strategy team to discuss scenario planning.



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