

## Preliminary List of Key Dates in OBBBA Implementation

**Effective October 1, 2025:** Loss of funding to Planned Parenthood clinics for healthcare provided to Medicaid enrollee (healthcare not related to abortions).

**Effective January 1, 2026:**

### Marketplace

- Bans financial assistance (APTCs) for lawfully present immigrants who are ineligible for Medicaid due to their status with income less than 100% FPL.
- No financial assistance allowed for people who enroll via an income-based SEP.
- Ends protections from paying back large amounts of financial assistance at tax time for working families if their estimated income or household size changed during the year; won't show up until tax filing in 2027.

**Effective January 1, 2027:**

### Medicaid

- Work reporting requirements begin for many able-bodied working age adults (though could be delayed until 12/1/2028).
- Biannual redeterminations for Medicaid Expansion enrollees (excludes folks on SSI)
- No retroactive coverage beyond 30 days from date of application.

### Marketplace

- Eliminates financial assistance for most lawfully present immigrants, including refugees, people granted asylum, certain survivors of domestic violence, sex or labor trafficking, and other crimes, special immigrant juveniles, and others. Only U.S. citizens, legal permanent residents, and certain Cuban and Haitian entrants will be eligible.
  - *Interaction with new marketplace rule: The rule makes DACA recipients ineligible for marketplace coverage beginning August 25, 2025.*

**Effective January 1, 2028:**

### Marketplace

- Eliminates provisional financial assistance, preventing people from getting APTCs until Pennie has verified their income and other eligibility criteria.
  - *Interaction with marketplace rule: The rule implements additional paperwork and verification requirements beginning August 25, 2025. Some of these provisions sunset on December 31, 2026.*
- Requires all enrollees to take action to continue their coverage from one year to the next, eliminating automatic re-enrollment. Allows marketplaces to use third party sources to generate information to be verified by the applicant.

**Effective October 1, 2028:** Cost sharing for Medicaid Expansion enrollees begins.