

## Can Only Be Implemented if State has a State-Based Marketplace (SBM)

State Program/Initiative/Policy	California	Colorado	Massachusetts	Pennsylvania	Washington
<a href="#">Active Purchaser or Clearinghouse exchange model<sup>1</sup></a>	Active Purchaser	Clearinghouse	Active Purchaser	Clearinghouse	Clearinghouse
<b>Easy/Tax-time Enrollment</b> <i>(can be done without an SBM but only for Medicaid/CHIP)</i>	Yes	Yes	Yes	Yes	No
<a href="#">Facilitated Enrollment (automatic enrollment)<sup>2</sup></a>	Yes, for some people during Medicaid unwinding	No	Yes, for <150% FPL if they begin application but don't select a plan (opt-in program)	No	No
<b>Option to have tax return shared with SBM</b>	Yes	Yes	Yes	Yes	No
<b>State-funded CSR</b>	Yes, on silver plans up to 250% FPL	Yes, on silver plans up to 250% FPL	Yes, on ConnectorCare plans (up to 500% FPL)	Under consideration for 2025	No, but Cascade Care plans emphasize lower out-of-pocket costs for various services
<b>State-funded Premium Subsidies</b>	No	Yes, for OmniSalud	Yes, on ConnectorCare plans (up to 500% FPL)	Under consideration for 2025	Yes, on silver or gold Cascade Care plans, up to 250% FPL

## Can Be Implemented Regardless of Whether State has a State-Based Marketplace (SBM) or Federally Facilitated Marketplace (FFM)

State Program/Initiative/Policy	California	Colorado	Massachusetts	Pennsylvania	Washington
<b>Individual Mandate</b>	Yes, revenue used for state CSR subsidies	No	Yes, revenue used for ConnectorCare	No	No
<b>Reinsurance</b> <i>(affordability impact varies by population)</i>	No	Yes (attachment point of \$50k, cap of \$250k, coinsurance rate of 80%)	No	Yes (attachment point of \$60k, cap of \$100k, and coinsurance rate of 60%)	No
<a href="#">Premium Alignment (also called Silver Loading) approach<sup>3</sup></a>	Carriers set their own load factor.	Carriers set their own load factor.	Carriers set their own load factor. Basic instructions <a href="#">here</a> <sup>4</sup> .	1.22 - 1.26 load factor defined in state regulations <a href="#">here</a> <sup>5</sup>	Carriers set their own load factor. Instructions <a href="#">here</a> <sup>6</sup> on page 16.
<b>Standardized Plans</b>	Yes, all plans	Yes, Colorado Option plans	Yes, <a href="#">ConnectorCare plans</a> <sup>7</sup>	No	Yes, <a href="#">Cascade Care Plans</a> <sup>8</sup>

# State Marketplace Affordability At-A-Glance



<b>Public Option</b>	No	Yes, Colorado Option plans	No	No	Yes, Cascade Select plans
<b>State Age Rating rules</b> <i>(affordability impact varies by population)</i>	No	No	Yes, 2:1	No	No
<b>State MLR rules</b>	No	No	Yes, 88%	No	No
<b>Program for undocumented immigrants</b> <i>(an approach like Washington's would require an SBM)</i>	Yes, Medi-Cal is available	Yes, OmniSalud (with state subsidies for up to 11,000 people). Cover All Coloradans begins in 2025, allowing children and pregnant people to enroll in Medicaid/CHP+ regardless of immigration status	Medicaid can be available for pregnant people <a href="#">regardless of immigration status</a> <sup>9</sup>	No	Yes, can enroll through Washington Healthplanfinder and receive up to \$250/month in state-funded premium subsidies
<b>Merged individual/small group markets</b> <i>(affordability impacts vary for each market segment, depending on pre-merge stability, costs, size, etc.)</i>	No	No	Yes	No	No

Acronyms			
<b>CHIP</b>	Children's Health Insurance Program	<b>FPL</b>	Federal Poverty Level
<b>CSR</b>	Cost-Sharing Reduction	<b>MLR</b>	Medical Loss Ratio
<b>FFM</b>	Federally Facilitated Marketplace	<b>SBM</b>	State-Based Marketplace

## Footnotes & Links

- Centers for Medicare and Medicaid Services, Initial Guidance to States on Exchanges, Sep 6 2023  
[https://www.cms.gov/ccio/resources/files/guidance\\_to\\_states\\_on\\_exchanges#:~:text=States%20have%20a%20range%20of,model%2C%20in%20which%20the%20Exchange](https://www.cms.gov/ccio/resources/files/guidance_to_states_on_exchanges#:~:text=States%20have%20a%20range%20of,model%2C%20in%20which%20the%20Exchange)
- Urban Insititute, Expanding Health Coverage through Marketplace Facilitated Enrollment Programs, Dec 2023 <https://digirepo.nlm.nih.gov/master/borndig/9918750488406676/9918750488406676.pdf>
- Health Affairs, How New Mexico Dramatically Reduced Marketplace Deductibles At Zero Cost To The State, Jul 20 2022  
<https://www.healthaffairs.org/content/forefront/new-mexico-dramatically-reduced-marketplace-deductibles-zero-cost-state>
- Commonwealth of Massachusetts, Health Coverage Filing Guidance Notice 2023-B, Mar 17 2023  
<https://www.mass.gov/doc/2023-b-rate-filing-materials-to-be-submitted-for-3q2023-4q2023-and-cy2024/download>
- Pennsylvania Insurance Department, 2024 ACA-Compliant Health Insurance Rate Filing Guidance, Mar 21, 2023  
[https://www.insurance.pa.gov/Companies/ProductAndRateRequire/Documents/2024\\_QHP\\_Guidance/2024%20ACA%20Rate%20Filing%20Guidance.Final.03.21.23.pdf](https://www.insurance.pa.gov/Companies/ProductAndRateRequire/Documents/2024_QHP_Guidance/2024%20ACA%20Rate%20Filing%20Guidance.Final.03.21.23.pdf)
- Washington State Office of the Insurance Commissioner, 2025 Plan Year Individual Nongrandfathered Health Plan (Pool) Rate Filing Checklist, Mar 29 2024 <https://www.insurance.wa.gov/media/7688>
- Massachusetts Health Connector, ConnectorCare Health Plans: Affordable, high-quality coverage from the Health Connector, Accessed May 14 2024 <https://www.mahealthconnector.org/wp-content/uploads/ConnectorCare-Overview-2024.pdf>
- Washington Health Benefit Exchange, Draft 2024 Standard Plan Designs, Accessed May 14 2024 [https://www.wahbexchange.org/content/dam/wahbe-assets/cascade-care/Draft%202024%20Standard%20Plans%20\\_Public%20Comment.pdf](https://www.wahbexchange.org/content/dam/wahbe-assets/cascade-care/Draft%202024%20Standard%20Plans%20_Public%20Comment.pdf)
- Massachusetts Law Reform Institute, Understanding Non-Citizen Eligibility for Health Coverage from MassHealth and the Health Connector, March 2024  
<https://www.masslegalservices.org/system/files/library/Understanding%20eligibility%20of%20non-citizens%20for%20MassHealth%20and%20Health%20Connector%202024.pdf>