

## Implementation Timeline for ACA, Medicaid, Medicare, SNAP, and Student Loan Provisions of the "One Big Beautiful Bill Act" and Marketplace Integrity and Affordability Final Rule

Topic	Provision	Effective Date	Source
Medicaid	Prohibits new/increased provider taxes (nursing homes & intermediate care facilities exempt)	7/4/25	<a href="#">OBBBA</a>
Medicaid	Prohibits select types of existing provider taxes *up to 3-year transition per Secretary discretion	7/4/25	OBBBA
Medicaid	Cap on any new state directed payments	7/4/25	OBBBA
Medicaid	Suspends certain provisions of Medicaid/CHIP eligibility & enrollment <a href="#">rule</a> until 10/1/34	7/4/25	OBBBA
Medicaid	Suspends certain provisions of Medicare Savings Program eligibility & enrollment <a href="#">rule</a> until 10/1/34	7/4/25	OBBBA
Medicaid	Suspends min. staffing requirements for nursing homes until 10/1/34	7/4/25	OBBBA
Medicaid	Prohibits funds for certain providers of abortion services for 1 year	7/4/25	OBBBA
SNAP	Modifications to "thrifty food plan"	7/4/25	OBBBA
SNAP	Modifications to work requirements, including applying requirements to older individuals (up to age 65) and narrowing exceptions. *AK and HI may receive an exemption through 12/31/2028	7/4/25*	OBBBA
SNAP	Limits automatic qualification for standard utility allowance to families with elderly/disabled member	7/4/25	OBBBA
SNAP	Excludes internet costs from SNAP's "shelter deduction" for purposes of determining income eligibility	7/4/25	OBBBA
SNAP	Limits SNAP eligibility for noncitizens to lawful permanent residents (i.e. green card holders), certain Cuban/Haitian entrants, and residents from <a href="#">COFA</a> states. Refugees, asylees, TPS recipients, DACA recipients, long-term parolees and other classes of noncitizens would no longer be eligible.	7/4/25	OBBBA
Student loans	Repayment Assistance Plan an allowable repayment plan for Public Service Loan Forgiveness Program	7/4/25	OBBBA
Student loans	Suspends 11/1/2022 <a href="#">rule</a> as it relates to borrower defense; reverts to prior borrower defense rules	7/4/25	OBBBA
Student loans	Suspends 11/1/2022 <a href="#">rule</a> as it relates to closed school discharges for loans that originate before 7/1/35	7/4/25	OBBBA
Student loans	Certain postsecondary credentialing expenses may be treated as qualified higher education expenses for 529 accounts	7/4/25	OBBBA
Medicare	Restricts Medicare coverage to lawful permanent residents (i.e. green card holders), certain Cuban/Haitian entrants, and residents from <a href="#">COFA</a> states. Refugees, asylees, TPS recipients, DACA recipients, long-term parolees and other classes of noncitizens would no longer be eligible. *Effective immediately for new applicants; applies to existing enrollees starting 1/4/2027	7/4/25* 1/4/27*	OBBBA

ACA	Income-based special enrollment period for households with income at or below 150% of the federal poverty level suspended through 12/31/26	8/25/25	<a href="#">ACA rule</a>
ACA	Insurers allowed to require payment of past-due premiums before issuing new coverage	8/25/25	ACA rule
ACA	Automatic 60-day grace period to verify income suspended through 12/31/26	8/25/25	ACA rule
ACA	DACA recipients no longer eligible for subsidies	8/25/25	ACA rule
ACA	Income verification required when tax data is unavailable or when enrollee attest to income over 100% FPL but data indicates a lower income (both sunset after 12/31/26)	8/25/25	ACA rule
SNAP	Annual funding for National Education and Obesity Prevention grant program eliminated	10/1/25	OBBBA
Rural Health	Application deadline- Rural Health Transformation Program (runs for 5 fiscal years)	12/31/25	OBBBA
Medicaid	Deadline for CMS guidance on 6-month eligibility redetermination requirement for expansion enrollees	12/31/25	OBBBA
Medicare	+2.5% conversion factor increase (through 12/31/26)	1/1/26	OBBBA
ACA	Required recapture of excess tax credits regardless of income	1/1/26	OBBBA
ACA	Enrollees who enroll in a plan during a special enrollment period based on income (e.g. those with income <150% of the FPL) not a qualifying life event no longer qualify for tax credits	1/1/26	OBBBA
ACA	Bronze and catastrophic plans + HSA can qualify as high-deductible plans. HSA plans can be used toward direct PC arrangements	1/1/26	OBBBA
ACA	Restricts premium tax credits for noncitizens to lawful permanent residents (i.e. green card holders), certain Cuban/Haitian entrants, and residents from <a href="#">COFA</a> states. Refugees, asylees, TPS recipients, DACA recipients, long-term parolees and other classes of noncitizens would no longer be eligible.	1/1/26	OBBBA
Medicaid	End of increased FMAP for states to expand Medicaid	1/1/26	OBBBA
ACA	Prohibits tax credits for those who fail to “file and reconcile” for a prior year. Sunsets 12/31/26).	1/1/26	ACA rule
ACA	Gender-affirming care barred from essential health benefits requirements	1/1/26	ACA rule
ACA	New web broker requirements and oversight provisions	1/1/26	ACA rule
ACA	New actuarial value requirements & premium adjustment methodology	1/1/26	ACA rule
ACA	Consumers automatically reenrolled in \$0 premium plans must pay \$5/month until they confirm their eligibility information. Only applicable to plans on federally facilitated exchanges or state-based exchanges on federal platform. Sunsets 12/31/26.	1/1/26	ACA rule
ACA	All Exchanges on the federal platform must conduct pre-enrollment verification of eligibility for at least 75% of new enrollments through special enrollment periods. Sunsets 12/31/26.	1/1/26	ACA rule
Student loans	Money that may be excluded from income for educational assistance for employer provided student loan payments increased in accordance with cost-of-living adjustment.	1/1/26	OBBBA
Student loans	Permanently extends taxpayer exclusion of any income resulting from discharge of student debt based on student’s death or total disability	1/1/26	OBBBA
Medicaid	Deadline for CMS guidance on community engagement requirements	6/1/26	OBBBA

Student loans	A student will not be eligible for a Federal Pell Grant for any period that they receive grant aid from non-federal sources if that aid equals or exceeds the cost of attendance.	7/1/26	OBBBA
Student loans	Ends Federal Direct PLUS Loan eligibility for graduate and professional students; imposes caps on Stafford Loans for graduate and professional students and caps parents' borrowing ability	7/1/26	OBBBA
Student loans	Students in "low earning" programs ineligible for federal student loans for that program	7/1/26	OBBBA
Student loans	Change to loan repayment options: New borrowers with loans on or after 7/1/26 can only repay using Standard or RAP; existing borrowers with no new loans on or after 7/1/26 can repay using Standard, IBR, Graduated, Extended, or RAP.	7/1/26	OBBBA
Medicaid	Caps FMAP at regular FMAP (NOT enhanced expansion FMAP) for emergency services provided to noncitizens who aren't otherwise eligible for Medicaid.	10/1/26	OBBBA
Medicaid	Limits Medicaid eligibility for noncitizens to lawful permanent residents (i.e. green card holders), certain Cuban/Haitian entrants, and residents from <a href="#">COFA</a> states. Refugees, asylees, TPS recipients, DACA recipients, long-term parolees and other classes of noncitizens would generally no longer be eligible. However, exceptions for noncitizens would remain for: (1) treatment for emergency medical conditions and (2) state option to cover lawfully present pregnant women and children.	10/1/26	OBBBA
ACA	New federal open enrollment deadline for plan year 2027 (states may elect until 12/31/26 at latest)	12/15/26	ACA rule
Medicaid/ACA	Mandatory federal work requirements (with certain exceptions) for Medicaid coverage & ACA subsidies *states can implement sooner (rulemaking required by 6/1/26)	1/1/27	OBBBA
Medicaid	States required to redetermine the eligibility of expansion enrollees at least once every 6 months *guidance required within 180 days (12/31/25)	1/1/27	OBBBA
Medicaid	Reduced retroactive coverage (30 days for expansion enrollees; 60 days for others & CHIP)	1/1/27	OBBBA
ACA	Certain immigrant classes excluded from definition of "lawfully present" for purposes of qualifying for tax credits (refugees, asylees, and those with temporary protected status)	1/1/27	OBBBA
Medicaid	States must pre-verify enrollee contact info & verify against death file quarterly *guidance by Jan. 2026	1/1/27	OBBBA
Medicaid	New Section 1115 waiver budget neutrality methodology	1/1/27	OBBBA
Student loans	Changes deferment and forbearance options for borrowers	7/1/27	OBBBA
Student loans	FEEL, Direct, and Perkins Loans may be rehabilitated twice instead of once	7/1/27	OBBBA
SNAP	States required to begin paying a state share of SNAP costs *Requirement will not apply to states with payment error rates <u>above</u> certain thresholds until 10/1/2028 or 10/1/2029	10/1/27*	OBBBA
SNAP	Federal share of SNAP administrative costs reduced from 50% to 25%	10/1/27	OBBBA
Medicaid	Beginning of phase-down in provider tax threshold for expansion states (0.5% per year until 3.5%)	10/1/27	OBBBA
Medicaid	Phased reductions in state-directed payments begin (10% per year until 100% Medicare rates for expansion states; 110% of Medicare rates in non-expansion states)	1/1/28	OBBBA
Medicaid	States must verify provider enrollment against death file quarterly	1/1/28	OBBBA
Medicaid	Caps home equity limits at \$1 million	1/1/28	OBBBA

ACA	New verification requirements for tax credits & cost sharing (effectively ends auto enrollment)	1/1/28	OBBBA
Medicare	Expanded exclusion for orphan drugs under Drug Price Negotiation Program	1/1/28	OBBBA
Medicaid	Demo allows states to expand HCBS to enrollees that don't require institutional level of care	7/1/28	OBBBA
Student loans	Borrowers in ICR, PAYE, or SAVE must transition to a different repayment plan by 7/1/28	7/1/28	OBBBA
Medicaid	Mandatory cost sharing for expansion adults (with caps & exceptions); providers may reduce/waive	10/1/28	OBBBA
Medicaid/ACA	States must submit monthly data for HHS to check for dual enrollment	10/1/29	OBBBA
Medicaid	Reduced federal contributions to states with identified improper payments/overpayments	10/1/29	OBBBA