Timeline of Key Provisions

ACA FR
August 25, 2025

DACA Recipients Cannot Qualify for Essential Plan and ACA Marketplace Coverage and Subsidies (Litigation pending)

HR1 and Tax FR
Sometime in 2025

New York's MCO Tax May Be Curtailed

December 31, 2025

Enhanced ACA Marketplace Subsidies Expire

ACA FR & HR1
January 1, 2026

Gender Affirming Care Cannot be Covered as an Essential Health Benefit (Litigation pending)

Lawfully Present Individuals With Incomes Under 100% FPL Cannot Qualify for ACA Marketplace Subsidies (*Aliessa* Population)

HR1
October 1, 2026

Medicaid and CHP is Restricted to Lawfully Present Individuals, Certain Cuban and Haitian Immigrants, and COFA Migrants

HR1
January 1, 2027

Work Requirements Begin

ACA Marketplace Subsidies Are Limited to Lawfully Present Individuals, Certain Cuban and Haitian Immigrants, and COFA Migrants With Incomes Between 100-400% FPL

HR1
October 1, 2028

Cost Sharing Required for Medicaid Services (but *not* for FQHCs)

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