ACA 2027

UPDATES AT-A-GLANCE

THE 2027 ACA SEASON is approaching quickly, and with it comes several changes affecting how agents sell. That's where our crew comes in. We're here to provide the right information to help you build a solid foundation for OEP this year. Take a moment to review this year's timetable for OEP below, and make sure to keep reading for blueprints on some key changes that may affect you and your clients.

Important Dates

Nov 1, 2026–Jan 15, 2027	**Open Enrollment** for 2027 ACA coverage
Nov 1–Dec 15, 2026	Enroll for coverage effective **January 1, 2027**
Dec 16, 2026–Jan 15, 2027	Enroll for coverage effective **February 1, 2027**
After Jan 15, 2027	The client needs a qualifying life event, such as loss of other coverage, a move, marriage, birth, or adoption, for a **Special Enrollment Period**.

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1. SUBSIDIES

The enhanced premium tax credits that ran through 2025 are gone. The 400% federal poverty level cutoff is back. Households over 400% FPL get no Marketplace premium tax credit.

2. COST-SHARING CAPS

CMS set the 2027 maximum annual limitation on cost sharing in the Jan 29, 2026 parameters guidance. This is the most a member can be required to pay in a year for covered in-network essential benefits (deductible, copays, and coinsurance combined). It is not the premium.

2027 Standard Cost-Sharing Maximums

Coverage	2027 Maximum
Self-Only Coverage	$12,000
Other than Self-Only Coverage	$24,000

Cost-Sharing Reductions (Silver Plans Only)

Household Income	2027 Maximum
100–200% FPL	$4,000
Over 200–250% FPL	$9,600

People who qualify for cost-sharing reductions get a lower legal ceiling, but only on the Silver plan: $4,000 if household income is 100–200% of FPL, and $9,600 if income is more than 200–250% of FPL. Cost-sharing reductions do not attach to Bronze, Gold, or Platinum. If a client newly qualifies for extra savings, they can move into Silver even when other metal choices are limited.

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3. JOB-BASED COVERAGE & MARKETPLACE SAVINGS

2027 Affordability Threshold

HealthCare.gov uses one percentage to decide if a job offer blocks Marketplace savings.

For 2027, a group plan is affordable if the employee share of the **lowest-cost self-only plan is less than 10.22% of household income**. In 2026, that figure was 9.96%.

What to Use for the Test

Measure the employee on the **individual premium only**. Do not use the family premium for that test. If the employee plan is affordable, but the family premium is not, the **other household members can still qualify for Marketplace benefits**.

Example*

Household income: **$50,000**

10.22% of $50,000 is about **$426 per month**.

If the individual group plan costs **more than $426 per month**, the offer is **not affordable**, and the employee or client **may get Marketplace help**.



**These numbers are a simplified example to illustrate the process of determining affordability. Do not use for an actual enrollment.*

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4. FFM AGENT RULES

Registration Pause

A CMS interim rule imposed a **moratorium on new FFM registrations** beginning **Sep 22, 2026**.

If a producer **does not already have a Plan Year 2026 Exchange agreement**, CMS **will not** register that producer for Plan Year 2027 until **Feb 1, 2027**, unless CMS lifts the pause early.

Producers who were registered for 2026 complete 2027 training and registration as usual.

Marketing Rules

Agents **may not**

- Tell a consumer they will always get a $0 plan or a $0 premium. CMS deemed this a prohibited practice.
- Use cash, rebates, gift cards, travel vouchers, or other incentives to get someone to enroll.
- Advertise that money saved on any premiums with the assistance of tax credits can go towards gas, rent, or groceries.
- Misstate Open Enrollment dates, Special Enrollment windows, or coverage start dates.

Logos and Marketing Materials

You **may not** use government logos in a way that looks like an official Marketplace endorsement.

You **may not** use carrier logos unless approved by the carrier prior to use.

Send marketing content, flyers, social media posts, and any other print or online content to **compliance@messerfinancial.com** for compliance approval.

Application and Consumer Authorization

For Plan Year 2027, CMS is adding system checks that call for

- **Electronic consumer authorization** before you open or change an application
- Refreshed **identity proofing**
- The consumer **SSN or immigration document number** on the application

BEFORE YOU ENROLL: 5 KEY REMINDERS

01 | Do not promise a price

Run the 2027 application, then read the result out loud.

02 | Update income and household size

Always **update expected 2027 income and household size**. Auto reenrollment without an update is how people get the wrong subsidy.

03 | Shop Silver

Shop **Silver** when income may fall **at or under 250% of FPL**. That is the only way to get the $4,000 or $9,600 reduced caps (over 250% FPL it is $12,000/24,000).

04 | Confirm FFM registration

Confirm your 2027 FFM registration if you held a 2026 agreement. **Do not** try to onboard producers who do not already have a Plan Year 2026 Exchange agreement during the moratorium.

05 | Get authorization first

Get authorization first. Collect **SSN or eligible immigration numbers**. Remind the client the first premium is paid to the issuer, not to the Marketplace, and **coverage does not start until that premium is paid**.



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