

Oscar Deep-Dive:

Provision Pausing Monthly SEP For Members $\leq$ 150% FPL

In June 2025, CMS finalized its Program Integrity Rule. The rule focuses on preventing fraud, waste, and abuse in the individual market.

One provision will pause the monthly Special Enrollment Period (SEP) for members with incomes at or below 150% FPL. This SEP will temporarily end, beginning August 25th through December 31, 2026.

Long-term: OEP (or other qualifying SEPs) will be the only option for the $<150\%$ FPL population to receive APTCs moving forward. Due to the budget reconciliation bill recently signed into law, the $<150\%$ FPL SEP will return beginning January 1, 2027, allowing individuals to enroll in this SEP, but they will not be eligible for APTC.



What brokers should **know**:

Members at or below 150% FPL will no longer have the ability to change carriers and plans monthly, unless they meet standards for other qualifying life events (QLEs). Healthcare.Gov lists eligible life changes to qualify for SEP [here](#). If these members are not eligible for other SEPs, they will need to enroll during the Open Enrollment Period (OEP) to gain or maintain coverage.



What brokers should **consider**:

Communicate this provision to your members near or below 150% FPL and make sure they are prepared to enroll in an ACA plan, including gathering all necessary eligibility verification documents, by the start of OEP. If they qualify, assist members in gaining coverage through other SEPs. See [here](#) for a list of standard and complex SEPs from Healthcare.Gov.

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