

The Final Reconciliation Package

Implementation of Key Provisions

On July 4, President Trump signed [H.R. 1](#), the [One Big Beautiful Bill Act](#), into law. The implementation dates for key health care provisions in the law vary, with some taking effect immediately upon passage and others being implemented over several years. This timeline details key dates for the implementation of the law's most significant health care provisions.

Effective Date	Program	Provision	Section	Key Deadline / Action
7/4/2025	Telehealth	Provides permanent safe harbor for high-deductible plans that offer telehealth and other remote services.	71306	Policy expired on December 31, 2024. Will be applied retroactively to current 2025 plan year.
7/4/2025	Medicaid	Medicare Savings Program eligibility/enrollment rule moratorium begins.	71101	Moratorium in effect immediately through September 30, 2034.
7/4/2025	Medicaid	Streamlining Medicaid & CHIP eligibility/enrollment rule moratorium begins.	71102	Moratorium in effect immediately through September 30, 2034.
7/4/2025	Medicaid	Nursing home minimum staffing standards rule moratorium begins.	71111	Moratorium in effect immediately through September 30, 2034.
7/4/2025	Medicaid	Prevents Medicaid payments to entities such as Planned	71113	Effective upon enactment for one year.

		Parenthood that received federal and state funding >\$800,000.		
7/4/2025	Medicaid	States must modify health care-related broad based and uniform tax waivers.	71117	Provides transition period of up to three years for non-compliant programs.
7/4/2025	Medicaid	Provider tax freeze.	71115	Effective on enactment.
12/31/2025	Medicaid	CMS guidance on community engagement due.	71119	Implementation interim final rule due by June 1, 2026, but initial guidance could come earlier.
12/31/2025	Medicaid	CMS guidance on 6-month redeterminations due.	71107	180 days after enactment.
1/1/2026	Marketplace	Premium tax-credit not allowed for <100%/FPL lawfully present aliens.	71302	Effective January 1, 2026.
1/1/2026	Medicare	2.5% bump to Physician Fee Schedule conversion factor.	71202	One-year increase for CY 2026.
1/1/2026	Medicaid	Enhanced FMAP for new expansion states sunsets.	71114	5-percentage-point bump ends for new adopters.
1/1/2026	Marketplace	APTC limits for Special Enrollment Period enrollees.	71304	Applies to plan years starting January 1, 2026.
1/1/2026	Marketplace	Full recapture of excess APTC below 400%/FPL.	71305	Tax years starting 2026.

1/1/2026	HSA	Enables HSA contributions for individuals with direct primary care service arrangements with monthly fee limits.	71308	Effective January 1, 2026.
1/1/2026	Other	Treats any individual exchange market bronze or catastrophic plans as an HDHP.	71307	Effective January 1, 2026.
6/1/2026	Medicaid	Interim final rule on community engagement requirements.	71119	Rulemaking deadline.
10/1/2026	Medicaid	Immigrant eligibility restricted.	71109	Definition of qualified immigrant narrowed.
10/1/2026	Medicaid	FMAP for Emergency Medicaid limited.	71110	States receive regular FMAP.
NOTE: Midterm Elections Occur				
12/31/2026	Medicaid	Community engagement requirements take effect.	71119	States implement (or seek good-faith extension).
12/31/2026	Medicaid	6-month redeterminations take effect.	71107	Applies to determinations beginning on December 31, 2026.
NOTE: New Congressional Session to Begin				
1/1/2027	Marketplace	Premium tax-credit eligibility narrowed for lawfully present aliens.	71301	Changes to lawfully present alien definition are effective in the taxable year beginning January 1, 2027. Verification of alien status is in effect in the plan year beginning on January 1, 2027.

1/1/2027	Medicaid	Beneficiary address verification processes live.	71103	States must collect address data monthly.
1/1/2027	Medicaid	Budget-neutrality requirements for Sec.1115 demos.	71118	CMS Chief Actuary certification begins.
1/1/2027	Medicaid	Retroactive coverage period shortened.	71112	One month (expansion)/two months (non-expansion).
1/1/2027	Medicaid	Quarterly SSA Death Master check for beneficiaries.	71104	States disenroll deceased members.
10/1/2027	Medicaid	Hold-harmless threshold reductions begin.	71115	Expansion states threshold drops 0.5 percent/year until max of 3.5 percent is reached in 2032.
10/1/2027	SNAP	State-matching fund requirements for the cost of SNAP program allotments.	10105	The implementation date is delayed for states where the state's error rate multiplied by 1.5 equals or exceeds 20% in FY2025 or FY2026. For such states, the implementation date is delayed until FY2029 if specified error rate occurs in FY2025 and until FY2030 if the error rate occurs in FY2026.
12/31/2027	Marketplace	Annual income verification (no passive re-enrollment).	71303	Exchange must verify APTC eligibility in the taxable year beginning after December 31, 2027.
1/1/2028	Medicaid	Quarterly SSA Death Master check for providers.	71105	States screen out deceased providers.
1/1/2028	Medicaid	Grandfathered state-directed payments	71116	Step-down toward Medicare limit.

		begin annual 10% cuts.		
1/1/2028	Medicaid	Home-equity limit (\$1M) for LTSS eligibility.	71108	Effective January 1, 2028.
7/1/2028	Medicaid	Standalone Sec. 1915(c) HCBS waiver authority begins.	71121	States may submit new waivers.
10/1/2028	Medicaid	Cost sharing for >100%-FPL expansion adults.	71120	\$35/service cap or >5%/income limit takes effect.
NOTE: Presidential and Congressional Elections Occur				
12/31/2028	Medicaid	Good-faith extensions expire.	71119	All states must comply.
NOTE: Presidential Inauguration and New Congressional Session Begins				
10/1/2029	Medicaid	HHS multi-state duplicate-enrollee system operational.	71103	Federal system must be live.
10/1/2029	Medicaid	Removing HHS' waiver flexibility related to erroneous excess payments.	71106	Effective for FY 2030.
9/30/2034	Medicaid	Prohibits enforcement of minimum staffing standards rule until date noted for LTCFs and MIPTR.	71111	Earliest date CMS may enforce rule.
9/30/2034	Medicaid	Streamlining rule moratorium ends.	71102	Earliest date CMS may enforce rule.
9/30/2034	Medicaid	MSP rule moratorium ends.	71101	Earliest date CMS may enforce rule.