

Impact Health Policy Weekly

Framing the week

Last week, President Trump indicated that the White House was preparing a proposal to extend the enhanced premium tax credits (EPTCs) for two years that also featured: 1) limiting subsidies to individuals up to 700 percent of the federal poverty level (FPL); 2) implementing a minimum premium for enrollees, and; 3) allowing enrollees to contribute some of their subsidy to a health savings account (HSA).

The potential proposal faced immediate backlash from both Democrats and Republicans, with House Democrat leaders [describing](#) the proposal as “another unworkable attempt to undermine the nation’s health care system and hike costs on millions of people,” and House Speaker Mike Johnson (R-LA) asserting that House Republicans do not support extending the subsidies. However, the Main Street Caucus, which consists of 86 House Republican members pushed back against speaker Johnson and [expressed their support](#) for President Trump’s effort to address the expiring subsidies.

On the Senate side, the Health, Education, Labor, and Pensions Committee Chair Bill Cassidy [announced](#) a [hearing](#) to be held on Wednesday, which will examine the rising health care costs and subsidy reform options. This comes ahead the Senate’s planned vote next week on a clean one-year extension of the EPTCs, which will likely result in a partisan vote.

MAHA Update

On November 24th, HHS [announced](#) five new agency leaders chosen to advance the goals of the Make America Healthy Again (MAHA) movement. Four of the five appointees have been confirmed by the Senate. These individuals include:

- **Brian Christine, Assistant Secretary for Health** – Dr. Christine is a urologist and a leader in men’s health issues. As Assistant Secretary for Health, he will lead the U.S. Public Health Service Commissioned Corps and focus on restoring trust in public health, radical transparency and chronic disease.
- **Alex Adams, Assistant Secretary for Family Support at the Administration for Children and Families** – Adams comes from the Idaho state government as a budget and regulatory director and Department of Health & Welfare director. In this role he worked to improve the child welfare system by extending the age of foster care to 23 and supporting foster homes.
- **Gustav Chiarello, Assistant Secretary Financial Resources** – Chiarello previously served as Senior Special Counsel to the House Committee on the Judiciary and on the Subcommittee on the Administrative State, Regulatory Reform, and Antitrust. Before the Hill, Chiarello worked as an attorney at the Federal Trade Commission (FTC). At HHS, Chiarello will focus on reducing health care spending, enhancing access to care and medicines, and revitalizing science.

- **Michael Stuart, General Counsel** – Stuart is a former U.S. Attorney who led the prosecutions of elder fraud, Medicaid fraud, and drug takedowns. Stuart is also Chair of the West Virginia Republican Parter and is a partner at two major law firms. At HHS, he will focus on fraud, waste, and abuse.
- **Alicia Jackson, Director of the Advanced Research Projects Agency for Health (ARPA-H)** – Dr. Jackson founded and acted as CEO of Evernow, a company focused on women’s health in longevity, following her departure from being Deputy Director of the Defense Advanced Research Projects Agency (DARPA) Biological Technologies Office. Dr. Jackson was chosen to lead ARPA-H to biotechnology breakthroughs and address major health challenges.

Regulatory Update

The Calendar Year (CY) 2025 Home Health Prospective Payment Rate Update [final rule](#) was released over the Thanksgiving break and Impact Health will be sending a summary out shortly. The Office of Management and Budget (OMB) also completed its review of a [rule](#) to repeal the minimum staffing standards for long-term care facilities.

The OMB is currently reviewing the following:

- ***NEW* ACA Marketplace:** The HHS Notice of Benefit and Payment Parameters for 2027 [proposed rule](#)
- **Medicare:**
 - **Procurement of Domestic PPE.** An [advance notice of proposed rulemaking](#) that would detail program incentives and requirements for Medicare providers and suppliers to invest and phase-in the procurement of American made personal protective equipment (PPE) and essential medicine to secure our nation’s health and safety.
- **Medicaid:**
 - **Gender-Affirming Care.**
 - A [proposed rule](#) titled, “Medicaid Program; Prohibition on Federal Medicaid Funding for Sex Trait Modification Procedures Furnished to Children and Youth.”
 - A [proposed rule](#) titled, “Medicare and Medicaid Programs; Hospital Condition of Participation: Limiting Participation Based on the Performance of Sex Trait Modification Procedures on Children.”
 - **State Directed Payments.** A [proposed rule](#) titled, “Medicaid Managed Care-State Directed Payments.” The proposed rule appears intended to advance a [presidential memorandum](#) released on June 6, which directs HHS to “eliminate waste, fraud, and abuse in Medicaid, including by ensuring Medicaid payments rates are not higher than Medicare, to the extent permitted by applicable law.”
 - ***NEW* Medicaid Tax Waivers.** A [proposed rule](#) titled, “Preserving Medicaid Funding for Vulnerable Populations – Closing a Health Care-Related Tax Loophole.”
- **Prescription Drugs:**
 - A [proposed](#) rule titled, “Improving Transparency into Pharmacy Benefit Manager Fee Disclosure” and a [proposed rule](#) addressing Transparency in Coverage requirements.

- **CMMI Drug Pricing Models.** A [proposed rule](#) for a Global Benchmark for Efficient Drug Pricing (GLOBE) Model and a [proposed rule](#) for Guarding U.S. Medicare Against Rising Drug Costs (GUARD) Model
- **Nutrition:**
 - **Head Start.** A [notice](#) from the Administration for Children and Families titled, “Publish Request for Information: Nutrition Services in Head Start Programs”
- **Immigration:**
 - **Unaccompanied Children.** An [interim final rule](#) titled, “Unaccompanied Children Program Foundational Rule; Update to Include Proof of Identity and Income Verification Standards.”

This Week in Health Policy

Tue. (12/2)

- **10:00am – Hearing: Organ Procurement Oversight** – The House Ways and Means Subcommittee on Oversight holds a hearing to examine the organ procurement industry and review preliminary findings from the Committee’s investigation, focused on holding tax-exempt organizations accountable. [Details.](#)
- **10:15am – Hearing: Children’s Online Safety** – The House Energy and Commerce Subcommittee on Commerce, Manufacturing, and Trade holds a hearing to examine a suite of online safety bills for children and teens online, including [H.R. 6291](#), Children and Teens’ Online Privacy Protection Act, a [discussion draft](#) for the Kids Online Safety Act, and a [discussion draft](#) for the Safeguarding Adolescents From Exploitative (SAFE) Bots Act to pre-empt state chatbot regulation. [Details.](#)

Wed. (12/3)

- **8:00am – Hill Discussion: AI Risks and Opportunities** – The Hill holds a discussion with top policymakers, tech leaders, regulators and academic experts for a forward-looking discussion on the opportunities and risks of artificial intelligence (AI), including the outlook on federal AI regulation. Sen. Mike Rounds (R-SD) and Reps. Don Beyer (D-VA) and Ted Lieu (D-CA) will participate. [Details.](#)
- **9:00am – FDA Meeting: Biosimilar Use Fee Act Reauthorization** – The Food and Drug Administration (FDA) holds a meeting to discuss proposed recommendations for the reauthorization of the Biosimilar User Fee Act (BsUFA) for fiscal years (FYs) 2028 through 2032. [Details.](#)
- **10:00am – Hearing: Health Care Affordability** – The Senate Health, Education, Labor, and Pensions Committee holds a hearing to examine making the health care system affordable. [Details.](#)
- **10:15am – Hearing: VA Health Care Benefits** – The House Veterans’ Affairs Committee holds a hearing to examine [H.R. 6047](#), the “Sharri Briley and Eric Edmundson Veterans Benefits Expansion Act of 2025”, to increase indemnity compensation for surviving spouses, and [H.R. 4077](#), the “GUARD Veterans’ Health Care Act”, to recover payments for any health care items or

services provided to veterans dually enrolled in a Medicare Advantage or Medicare Prescription Drug (Part D) plan. [Details.](#)

- **2:30pm – Hearing: Federal Courts Oversight** – The Senate Judiciary Subcommittee on Federal Courts, Oversight, Agency Action, and Federal Rights, holds a hearing to examine impeachment, focusing on holding judges accountable. [Details.](#)
- **4:00pm – Hearing: VA Medication Management** – The Senate Veterans’ Affairs Committee holds a hearing to examine medication management in VA health care. [Details.](#)

Thurs. (12/4)

- **9:00am – Punchbowl Discussion: Alzheimer’s Diagnosis and Treatment Outlook** – Punchbowl News holds a discussion with Senate Appropriations Committee Chair Susan Collins (R-ME) to discuss the future of Alzheimer’s disease diagnosis and treatment. [Details.](#)
- **10:00am – Brookings Discussion: AI Regulation** – The Hamilton Project at Brookings holds a discussion on the opportunities and risks associated with the growing use of algorithms, including whether new regulatory frameworks or ways of adapting existing anti-discrimination and other rules are needed. [Details.](#)
- **10:30am – CAP Discussion: AI Innovation** – The Center for American Progress (CAP) holds a discussion with Sen. Mark Kelly (D-AZ) to discuss his new “AI for America” [roadmap](#) and the Trump Administration’s approach to AI policy. [Details.](#)
- **11:00am – BPC Discussion: Health Care Technology Federal Policy** – The Bipartisan Policy Centers (BPC) holds a discussion with health policy experts, researchers, and system leaders to explore the landscape of health technologies, assess their promise and risks, and look ahead to the key questions shaping federal policy in 2026. Amy Gleason, Acting Administrator, U.S. DOGE Service and Strategic Advisor to the Centers for Medicare and Medicaid Services (CMS) delivers keynote remarks. [Details.](#)
- **1:00pm – CMS Meeting: WISer Implementation** – CMS holds office hours to discuss the Wasteful and Inappropriate Service Reduction (WISer) Model’s impact on providers, address frequently asked questions and respond to live inquiries. [Details.](#)
- **1:00pm – AHP Discussion: Health Care AI Policy** – The Alliance for Health Policy (AHP) holds a discussion to examine how the legislative and regulatory landscape for health care AI has shifted over the past year, and where approaches to federal and state policy are continuing to develop. [Details.](#)
- **Meeting: MedPAC** – The Medicare Payment Advisory Commission (MedPAC) meets to discuss Medicare issues and policy questions. [Details.](#)

Fri. (12/5)

- **Meeting: MedPAC** – MedPAC meets to discuss Medicare issues and policy questions. [Details.](#)

Additional Multi-Day Events

- **Dec 4-Dec 5 – CDC Meeting: Immunization Practices** – The Centers for Disease Control and Prevention (CDC) holds a meeting of the Advisory Committee on Immunization Practices (ACIP)

for a discussion on vaccine safety; the childhood and adolescent immunization schedule; and hepatitis B vaccines. [Details](#).

Featured Analysis

- **Impact Health Chart: Available Information on State Applications for the Rural Health Transformation Program** – In Policy Hub [here](#).
- **Impact Health Government Shutdown Risks and Implications** – In Policy Hub [here](#).
- **Impact Health Spring 2025 Regulatory Outlook** – In Policy Hub [here](#).
- **Insight for Impact: Vaccine Policy Under RFK Jr.** – In Policy Hub [here](#).
- **OBBA Medicaid Provisions and Timeline for Implementation** – In Policy Hub [here](#).
- **Changes to ACA Premium Tax Credit Policy in 2026 and Beyond** - In Policy Hub [here](#).

Congressional Lookback

Fri. (11/21)

- **Sen. Scott (R-FL)** introduced the [More Affordable Care Act](#) as an alternative to the EPTCs. [Details](#).

Thurs. (11/20)

- **Rep. Pocan (D-WI)** introduced [a package of Medicare Advantage \(MA\) bills](#). [Details](#).
- **The House E&C Subcommittee on Oversight and Investigations** convened a [hearing](#) to examine the rapidly expanding use of artificial intelligence (AI) chatbots. [Details](#).

Wed. (11/19)

- **The Senate Finance Committee** convened a [hearing](#) to examine rising health care costs and potential policy solutions. [Details](#).
- **The Senate Special Committee on Aging** convened a [hearing](#) with generic drug manufacturers to discuss the U.S. manufacturing of generic drugs and APIs. [Details](#).
- **The chairs of the W&M and E&C Committees** sent letters this week to a [New Jersey OPO](#) and to the [CMS](#). [Details](#).

Regulatory Lookback

Wed. (11/25)

- **CMS** released the CY 2027 MA and Part D policy and technical changes [proposed rule](#). Comments are due January 26. [Details](#).
- **CMS** announced the [maximum fair prices \(MFPs\)](#) for the 15 drugs selected for initial payment year (IPAY) 2027. [Details](#).

Fri. (11/21)

- **CMS** released the CY 2026 OPPS and ASC Payment System [final rule](#). [Details](#).

- **The CBO** released a [blog](#) calling for new research in the area of spending on Medicare Part D. [Details.](#)
- **CMS** issued a [notice](#) announcing that it will share specified information with DHS and ICE. [Details.](#)

Thurs. (11/20)

- **CMS** released the CY 2026 ESRD PPS [final rule](#). [Details.](#)
- **CMS** updated its [telehealth FAQs document](#) to reflect the CR passed by Congress. [Details.](#)
- **The GAO** [released](#) a report examining the landscape of Health Savings Accounts. [Details.](#)
- **HHS OIG** released an [audit](#) of CMS's evaluation of whether the agency closed contracts in accordance with FAR. [Details.](#)

Tues. (11/18)

- DHS issued a [notice of proposed rulemaking](#) to rescind the 2022 public charge ground of inadmissibility regulations. Comments are due December 19. [Details.](#)

Mon. (11/17)

- **CMS** released [preliminary guidance](#) to states on how the agency expects to implement changes to health-care related (provider taxes) contained in H.R.1. [Details.](#)
- **CMS** released updates related to sharing personal information. Comments are due December 18. [Details.](#)

Comment & Application Deadlines

- **December 15:** The CFPB issued a [proposed rule](#) that would significantly narrow and simplify its 2023 Section 1071 small-business lending data collection requirements. [Details.](#)
- **December 18:** CMS released updates related to sharing personal information. [Details.](#)
- **December 19:** DHS issued a [notice of proposed rulemaking](#) to rescind the 2022 public charge ground of inadmissibility regulations. [Details.](#)
- **January 14:** HUD released a [NOFO](#) for a new grant cycle of the Continuum of Care (CoC) program. [Details.](#)
- **January 26:** CMS released the CY 2027 MA and Part D policy and technical changes [proposed rule](#). [Details.](#)
- **March 31:** CMMI announced [GENEROUS \(GENERating cost Reductions fOr U.S. Medicaid\) Model](#). [Details.](#)
- **June 3:** CMMI released a [NOFO](#) for the second cohort of the Innovation in Behavioral Health Model. [Details.](#)