Government Shutdown Update: Healthcare Impacts Deepen

Since lawmakers failed to pass a bill to fund the federal government before the September 30, 2025 deadline, lawmakers have remained deadlocked over the spending bill. The deadlock is centered on the continuation of health insurance exchange subsidies, but the shutdown has broader implications on the healthcare industry. This Health Capital Topics article provides an update on the continuing saga.

Congress passed the most recent temporary funding bill, known as a continuing resolution (CR), on March 14, 2025, funding the government through the remainder of fiscal year 2025, until September 30, 2025. While House Republicans unilaterally passed a stopgap measure extending funding until November 21, it failed in the Senate, where Democrats assert that they will not vote for a spending bill that does not protect healthcare access, including renewing the Affordable Care Act (ACA) marketplace enhanced premium tax credits and repealing the One Big Beautiful Bill Act (OBBBA) Medicaid provisions.² Senate Democrats subsequently proposed an alternative stopgap bill to fund the government through October 31, permanently extend the ACA subsidies, and reverse the OBBBA Medicaid cuts; that bill also failed.³ Senate Republicans have a narrow majority, but require Democratic backing to meet the 60-vote threshold needed to pass an extension.

The ACA marketplace enhanced premium tax credits, which are provided to lower-income individuals to purchase health insurance on the ACA insurance exchanges, and have been in place since 2021, are currently set to sunset at the end of 2025.4 The Urban Institute estimates that if the ACA enhanced premium tax credits ultimately expire, 22 million Americans would see increased health insurance costs, and healthcare providers would lose \$32.5 billion in revenue and take on an additional \$7.7 billion in uncompensated care costs next year.⁵ Democrats pushed to include an extension to the tax credits in OBBBA, but were unsuccessful. OBBBA provisions also included over \$911 billion in Medicaid cuts and new conditions on eligibility, which are expected to increase the number of uninsured people by 10 million.⁶ Notwithstanding the insurance subsidies, insurance premiums across the U.S. are expected to increase a median of 18% next year.⁷ This combination of increasing costs results in the largest price increase since the marketplaces were launched 12 years ago.8

In an interesting twist, the open enrollment on the ACA exchanges (which is expected to be directly impacted by the cost of those ACA insurance exchange plans over which lawmakers are arguing) begins November 1, 2025. In anticipation of the start of ACA exchange open enrollment – as well as Medicare open enrollment, which began October 15th – the Centers for Medicare & Medicaid Services (CMS) ordered its furloughed employees to return to work on October 27th, "in order to best serve the American people amid the Medicare and Marketplace open enrollment seasons." ¹⁰

In addition to the furlough of thousands of federal workers and significant disruption across the country, the shutdown resulted in the expiration of several healthcare program and policy extenders, 11 including Medicare telehealth flexibilities, the hospital-at-home waiver, and community health center funding. 12 This means that Medicare is not currently reimbursing providers for rendering these services. 13 More than 6.7 million seniors (25% of eligible Medicare beneficiaries) participated in a telehealth visit in 2024, and approximately 31,000 seniors received care in their homes from over 400 hospitals under the hospital-at-home waiver through October 2024. 14 The abrupt discontinuation of these services could meaningfully disrupt senior healthcare.

Other healthcare priorities affected by the government shutdown include:

- Funding for Medicaid disproportionate share hospital (DSH) payments;
- Funding for federally qualified health centers (FQHCs);
- Funding for Medicare-dependent hospitals and low-volume hospitals;
- Funding for graduate medical education (GME);
- Ambulance add-on Medicare payments for rural and underserved urban areas; and
- Emergency preparedness programs (the *Pandemic* and *All-Hazards Preparedness Act of 2006* has already partially lapsed). ¹⁵

In one positive development for healthcare stakeholders and in response to stakeholder calls, ¹⁶ CMS instructed all of its Medicare Administrative Contracts (MACs) on October 22, 2025 to begin processing Medicare Physician Fee Schedule (MPFS) claims, which include telehealth claims "that CMS can confirm are definitively

for behavioral and mental health services," ground ambulance transport claims, and FQHC claims, for claims dated during the shutdown.¹⁷ However, other claims, such as those under the hospital-at-home program, are not yet being funded.¹⁸

Despite the substantial challenges presented by the shutdown, some healthcare lobbyists believe the strong focus on exchange plans may present an opportunity for "both advocates and congressional staff...to focus on more complicated issues."19 For example, American Telemedicine Association (ATA) members have been lobbying congressional members consistently during the shutdown, and have been "generally getting great access," which the ATA believes may signal that "lawmakers will enact a more enduring structure for telehealth in the future."20 Other lobbyists and advocates have shared that older (often bipartisan) healthcare issues are "still in plan," with a larger healthcare package potentially being developed by congressional offices; however, such developments have not yet crossed the aisle.²¹ Nevertheless, as the executive vice president for economic and health policy at the Bipartisan Policy Center, a think tank, stated, the "more bipartisan ideas will come together at some point, and may emerge during a very tight timeframe if the shutdown stretches on."²²

Although many in the healthcare industry have yet to feel the shutdown's effects as Medicare and Medicaid funding is not subject to annual appropriations, those healthcare stakeholders whose funding have been turned off have been vocal in imploring lawmakers to help. As the senior vice president of public policy for the American Telemedicine Association (ATA) stated, "Every day that goes by is really a calamity, renewed and expanded, for our community."23 The chief policy officer of the National Association of Community Health Centers, similarly stated: "For a program that relies on federal funding and is already operating on short-term extensions, the uncertainty and the signal that it sends to the health center workforce is another complicating factor as we try to adjust to some difficult financial outlooks."24

The political deadlock in the midst of a government shutdown, and the role of healthcare in that deadlock, underscores the persistent volatility in federal healthcare policy and the vulnerability of temporary program extensions. Health Capital Topics will continue to track the government shutdown and provide updates as events unfold.

- "Healthcare Extenders Tracker (July 2025 Update)" By Rachel Stauffer, et al., McDermott+, July 11, 2025, https://www.mcdermottplus.com/insights/healthcare-extenders-tracker/ (Accessed 9/29/25).
- "Trump to Meet With Congressional Leaders as Shutdown Looms" By Michael Gold, New York Times, September 29, 2025, https://www.nytimes.com/2025/09/29/us/politics/trump-shutdownmeeting-schumer-jeffries-johnson.html# (Accessed 9/29/25)
- "Key health programs face cliff as government funding bill falls" By Michael McAuliff, September 19, 2025, https://www.modernhealthcare.com/politics-regulation/telehealthmedicaid-dsh-stopgap-funding-bill/ (Accessed 9/29/25); "Why ACA tax credits for 22 million Americans are at the center of the government shutdown drama" By Aimee Picchi, CBS News, September 30, 2025, https://www.cbsnews.com/news/government-shutdown-affordable-careact-enhanced-premium-tax-credit/ (Accessed 9/30/25).
- "Five Things to Know about the Renewal of Extra Affordable Care Act Subsidies in the Inflation Reduction Act" By Cynthia Cox, Kaiser Family Foundation, August 11, 2022, https://www.kff.org/policy-watch/fivethings-to-know-about-renewal-of-extra-affordable-care-act-subsidies-ininflation-reduction-act/#:~:text=Subsidies%20in%20the%E2%80%A6-"Five%20Things%20to%20Know%20about%20the%20Renewal%20of% 20Extra%20Affordable in%20the%20Inflation%20Reduction%20Act&te $xt = As\%\,20part\%\,20of\%\,20the\%\,20Inflation, previously\%\,20priced\%\,20out\%$ 20of%20coverage. (Accessed 4/21/25).
- "Providers face \$32.1B in lost 2026 revenue if enhanced ACA subsidies expire" By Dave Muoio, Fierce Healthcare, September 26, 2025, https://www.fiercehealthcare.com/providers/providers-face-321b-lost-2026-revenue-if-aca-enhanced-premiums-expire (Accessed 9/29/25).
- "Allocating CBO's Estimates of Federal Medicaid Spending Reductions Across the States: Enacted Reconciliation Package" By Rhiannon Euhus, Kaiser Family Foundation, July 23, 2025, https://www.kff.org/medicaid/allocating-cbos-estimates-of-federalmedicaid-spending-reductions-across-the-states-enacted-reconciliationpackage/ (Accessed 9/30/25).
- "ACA Marketplace Premium Payments Would More than Double on Average Next Year if Enhanced Premium Tax Credits Expire" By Justin Lo, Larry Levitt, Jared Ortaliza, and Cynthia Cox, Kaiser Family Foundation, September 30, 2025, https://www.kff.org/affordable-careact/aca-marketplace-premium-payments-would-more-than-double-onaverage-next-year-if-enhanced-premium-tax-credits-expire/ (Accessed 10/24/25).
- "Health insurance sticker shock begins as shutdown battle over subsidies rages" By The Washington Post, October 22, 2025,

- https://www.washingtonpost.com/health/2025/10/22/obamacare-acaenrollment-price-increases/ (Accessed 10/24/25).
- "How the shutdown impacts healthcare: CMS recalls furloughed workers ahead of ACA open enrollment" By Emma Beavins, Paige Minemyer, Dave Muoio, Fierce Healthcare, October 23, 2025, https://www.fiercehealthcare.com/regulatory/shutdown-tracker-cmsissues-billing-guidance-hhs-furloughs-32000-employees (Accessed 10/24/25).
- Ibid. 10
- "Many healthcare programs are extended for specific time periods, as short as one or two years or as long as 10, and are usually attached to a larger piece of must-pass legislation." "Healthcare Extenders Tracker (July 2025 Update)" By Rachel Stauffer, et al., McDermott+, July 11, 2025, https://www.mcdermottplus.com/insights/healthcare-extenderstracker/ (Accessed 9/29/25).
- "McDermott+ Check-Up: September 26, 2025" JDSupra, September 29, 2025, https://www.jdsupra.com/legalnews/mcdermott-check-upseptember-26-2025-9311052/ (Accessed 9/29/25).
- "Health sector seeks wins as government shutdown drags on" By Michael McAuliff, Modern Healthcare, October 21, 2025, https://www.modernhealthcare.com/politics-regulation/mh-governmentshutdown-telehealth-lobby/ (Accessed 10/24/25). "Millions of seniors could lose access to telehealth without deal in
- Congress" By Lauren Weber and Trisha Thadani, The Washington Post, September 30, 2025,
 - https://www.washingtonpost.com/health/2025/09/30/shutdown-threatenssenior-telehealth/ (Accessed 9/30/25).
- "Key health programs face cliff as government funding bill falls" By Michael McAuliff, September 19, 2025. https://www.modernhealthcare.com/politics-regulation/telehealthmedicaid-dsh-stopgap-funding-bill/ (Accessed 9/29/25).
- See, e.g., "MGMA Calls on CMS to Lift Claims Hold on Affected Medicare Part-B Claims (October 21, 2025)" Medical Group Management Association, October 21, 2025, https://www.mgma.com/press-statements/october-21-2025-mgma-callson-cms-to-lift-claims-hold-on-affected-medicare-part-b-claims (Accessed 10/24/25)
- Fierce Healthcare, October 23, 2025.
- 18 Ibid.
- Modern Healthcare, October 21, 2025. 19
- 20 Ibid.
- 21 Ibid.
- 22 Ibid.
- 23 Ibid. Ibid.



(800) FYI -VALU

Providing Solutions in an Era of Healthcare Reform

- Firm Profile
- **HCC Services**
- **HCC** Leadership
- **Clients & Projects**
- **HCC News**
- **Health Capital Topics**
- **Contact Us**
- **Email Us**
- **Valuation Consulting**
- **Commercial** Reasonableness **Opinions**
- **Commercial Payor** Reimbursement **Benchmarking**
- **Litigation Support & Expert Witness**
- Financial Feasibility **Analysis & Modeling**
- **Intermediary Services**
- Certificate of Need
- **ACO Value Metrics & Capital Formation**
- **Strategic Planning**
- **Industry Research**

LEADERSHIP









Todd A. Zigrang, MBA, MHA, FACHE, CVA, ASA, ABV, is the President of HEALTH CAPITAL CONSULTANTS (HCC), where he focuses on the areas of valuation and financial analysis for hospitals, physician practices, and other healthcare enterprises. Mr. Zigrang has over 30 years of experience providing valuation, financial, transaction and strategic advisory services nationwide in over 2,500 transactions and joint ventures. Mr. Zigrang is also considered an expert in the field of healthcare compensation for physicians, executives and other professionals.

Mr. Zigrang is the co-author of "The Adviser's Guide to Healthcare - 2nd Edition" [AICPA-2015], numerous chapters in legal treatises and anthologies, and peer-reviewed and industry articles such as: The Guide to Valuing Physician Compensation and Healthcare Service Arrangements (BVR/AHLA); The Accountant's Business Manual (AICPA); Valuing Professional Practices and Licenses (Aspen Publishers); Valuation Strategies; Business Appraisal Practice; and, NACVA QuickRead. Additionally, Mr. Zigrang has served as faculty before professional and trade associations such as the American Society of Appraisers (ASA); the National Association of Certified Valuators

and Analysts (NACVA); the American Health Lawyers Association (AHLA); the American Bar Association (ABA); the Association of International Certified Professional Accountants (AICPA); the Physician Hospitals of America (PHA): the Institute of Business Appraisers (IBA); the Healthcare Financial Management Association (HFMA); and, the CPA Leadership Institute. He also serves on the Editorial Board of The Value Examiner and QuickRead, both of which are published by NACVA.

Mr. Zigrang holds a Master of Science in Health Administration (MHA) and a Master of Business Administration (MBA) from the University of Missouri at Columbia. He is a Fellow of the American College of Healthcare Executives (FACHE) and holds the Certified Valuation Analyst (CVA) designation from NACVA. Mr. Zigrang also holds the Accredited in Business Valuation (ABV) designation from AICPA, and the Accredited Senior Appraiser (ASA) designation from the American Society of Appraisers, where he has served as President of the St. Louis Chapter. He is also a member of the America Association of Provider Compensation Professionals (AAPCP), AHLA, AICPA, NACVA, NSCHBC, and, the Society of OMS Administrators (SOMSA).









Jessica L. Bailey-Wheaton, Esq., is Senior Vice President and General Counsel of HCC. Her work focuses on the areas of Certificate of Need (CON) preparation and consulting, as well as project management and consulting services related to the impact of both federal and state regulations on healthcare transactions. In that role, Ms. Bailey-Wheaton provides research services necessary to support certified opinions of value related to the Fair Market Value and Commercial Reasonableness of transactions related to healthcare enterprises, assets, and services.

Additionally, Ms. Bailey-Wheaton heads HCC's CON and regulatory consulting service line. In this role, she prepares CON applications, including providing services such as: health planning; researching, developing, documenting, and reporting the market utilization demand and "need" for the proposed services in the subject market service area(s); researching and assisting legal counsel in meeting regulatory requirements relating to licensing and CON application development; and, providing any requested support services required in litigation challenging rules or decisions promulgated by a state agency. Ms. Bailey-Wheaton has also been engaged by both state government

agencies and CON applicants to conduct an independent review of one or more CON applications and provide opinions on a variety of areas related to healthcare planning. She has been certified as an expert in healthcare planning in the State of Alabama.

Ms. Bailey-Wheaton is the co-author of numerous peer-reviewed and industry articles in publications such as: The Health Lawyer (American Bar Association); Physician Leadership Journal (American Association for Physician Leadership); The Journal of Vascular Surgery; St. Louis Metropolitan Medicine; Chicago Medicine; The Value Examiner (NACVA); and QuickRead (NACVA). She has previously presented before the American Bar Association (ABA), the American Health Law Association (AHLA), the National Association of Certified Valuators & Analysts (NACVA), the National Society of Certified Healthcare Business Consultants (NSCHBC), and the American College of Surgeons (ACS).





Janvi R. Shah, MBA, MSF, CVA, serves as Senior Financial Analyst of HCC. Mrs. Shah holds a M.S. in Finance from Washington University Saint Louis and the Certified Valuation Analyst (CVA) designation from NACVA. She develops fair market value and commercial reasonableness opinions related to healthcare enterprises, assets, and services. In addition she prepares, reviews and analyzes forecasted and pro forma financial statements to determine the most probable future net economic benefit related to healthcare enterprises, assets, and services and applies utilization demand and reimbursement trends to project professional medical revenue streams and ancillary services and technical component (ASTC) revenue streams.

For more information please visit: www.healthcapital.com