

## Section 1332 of the Patient Protection and Affordable Care Act (ACA) State Innovation Waivers – Pass-through Funding Report

**Reporting Instructions:** Please capture data for the 1332 waiver grant yearly pass-through funding report in this template, which has been developed based on your specific terms and conditions and in accordance with ACA section 1332(a)(3). Pass-through funding reports are due yearly throughout the life of your waiver no later than September 15 of the current calendar year in order to inform pass-through funding calculations for the following calendar year. The pass-through funding amount will be reported to the state as soon as practicable, conditional on timely receipt of this report.

STATE:

A. GRANTEE INFORMATION			
<b>1. Reporting Period End Date</b> <div style="font-size: 1.2em; font-weight: bold;">12/31/2023</div>	<b>2. Report Due Date</b> <div style="font-size: 1.2em; font-weight: bold;">09/23/2022</div>	<b>3. Date Submitted</b> <div style="font-size: 1.2em; font-weight: bold;">09/23/2022</div>	
<b>4. Federal Agency and Organization Element to Which Report is Submitted</b>  Consumer Information & Insurance Oversight (CCIO)	<b>5. Federal Grant Number Assigned by Federal Agency</b> SIWIW200014	<b>6a. DUNS Number</b> 082406534	<b>6b. EIN</b> 81-0302402
<b>7. Recipient Organization Name</b> <div style="font-size: 1.2em; font-weight: bold;">Montana State Auditor</div>			
<b>Address Line 1</b> <div style="font-size: 1.2em; font-weight: bold;">840 Helena Avenue</div>			
<b>Address Line 2</b> 			
<b>Address Line 3</b> 			
<b>City</b> <div style="font-size: 1.2em; font-weight: bold;">Helena</div>	<b>State</b> <div style="font-size: 1.2em; font-weight: bold;">MT</div>	<b>Zip Code</b> <div style="font-size: 1.2em; font-weight: bold;">59601</div>	<b>Zip Extension</b> 
<b>9. Grant Period End Date</b> <div style="font-size: 1.2em; font-weight: bold;">Dec. 31, 2024</div>		<b>8. Grant Period Start Date</b> <div style="font-size: 1.2em; font-weight: bold;">Jan. 1, 2020</div>	

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**10. Other Attachments (attach other documents as needed or as instructed by the awarding Federal agency)**

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### B. PASS-THROUGH FUNDING DATA

**11a. Under section 1332(a)(3) and STC 15, metrics to assist the Departments in calculating pass-through funding for the effective plan year.**

	Value	Comments (if applicable)
<p>i. The final 2023 second lowest cost silver plan (SLCSP) rates<sup>1</sup> for individual health insurance coverage for a representative individual (e.g., a 21-year old non-smoker) in each rating area or service area (if premiums vary by geographies small than rating areas).</p> <p><sup>1</sup> Please incorporate the Essential Health Benefit (EHB) % of premium into the SLCSP determinations. The SLCSP should be determined only based on the portion of the premium that reflects EHB.</p>	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
<p>ii. Estimates of what the final 2023 SLCSP rates for individual health insurance coverage for a representative individual in each rating area or service area (if premiums vary by geographies smaller than rating areas) would have been without the waiver.</p>	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
<p>iii. The 2022 SLCSP rates for a representative individual in each rating area or service area (if premiums vary by geographies smaller than rating areas). Note that the rating or service area data for 2022 and 2023 needs to be the same, so please use the 2023 service areas for both years of data.</p>	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
<p>iv. The total amount of all premiums expected to be paid for individual health insurance coverage for plan year (PY) 2023.</p>	\$466,581,731	Please see accompanying report for methodological details
<p>v. Estimate of what total premiums would have been for individual health insurance coverage for PY 2023 without the waiver.</p>	\$504,003,206	Please see accompanying report for methodological details
<p>vi. For SBE states: The amount of advance premium tax credit (APTC) paid by month and rating area for the current PY 2022 to date.</p>	[Please complete as part of the spreadsheet provided to SBE states only.]	[Please complete as part of the spreadsheet provided to SBE states only.]
<p>vii. For SBE states: The number of APTC recipients by month and rating area for the current PY 2022 to date.</p>	[Please complete as part of the spreadsheet provided to SBE states only.]	[Please complete as part of the spreadsheet provided to SBE states only.]

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viii. The state specific age curve premium variation for the current and upcoming plan year for the individual market.	[Please note yes if there is a state specific age curve and complete as part of the spreadsheet.]	[Please note yes if there is a state specific age curve and complete as part of the spreadsheet.]
ix. Estimate of total reinsurance reimbursements for PY 2023.	\$39.6M	Please see accompanying report for methodological details
x. Estimate of total 2023 enrollment for individual health insurance coverage with the waiver.	62,684	Please see accompanying report for methodological details
xi. Estimate of what total 2023 enrollment for individual health insurance coverage would be without the waiver.	62,167	Please see accompanying report for methodological details

**11b. Under section 1332(a)(3), a narrative to explain the methodology used to estimate data to assist the Departments in calculating pass-through funding for the subsequent year.**

i. For the estimate of what the final SLCSP rates for a representative individual in each rating area or service area would have been in 2023 without the waiver, provide a narrative that includes information on the methods and assumptions used to estimate this data.	Please see the accompanying methodological document for full details. A reinsurance impact was provided by each carrier. Rates with the waiver were increased by the corresponding impact by carrier, and a SLCSP was identified for each county based on these rates.
ii. For the estimate of what total premiums would have been for PY 2023 without the waiver, provide a narrative that includes information on the methods and assumptions used to estimate this data.	Please see the accompanying methodological document for full details. The average premium increase was developed as described in the above section 11.b.i. 2023 enrollment was estimated to decrease as a results of the premium increases among unsubsidized enrollees if there was no reinsurance/waiver. Total premiums were then estimated by multiplying average enrollment per month by average premium per member per month and by 12.
iii. An explanation on why the experience for PY 2023 may vary from previous estimates and how assumptions used to estimate the impact have changed. This includes an explanation for changes in the estimated impact of the waiver on aggregate premiums, the estimated impact to the SLCSP rates, and the estimated impact on enrollment.	Please see the accompanying methodological document for full details. Premiums and enrollment varied from previous estimates in that they include a) actual 2022 experience through June, b) 2023 rate filing information, and c) more up to date information on the impact of the potential end of the public health emergency. Each of these data points are updates from prior estimates. Additionally, the end of the PHE is expected to increase enrollment, specifically APTC enrollment. Wakely assumed the PHE ends at the end of 2022 and Montana takes 12 months to redetermine all enrollees.

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The state should also explain changes to the estimated reinsurance estimates relative to prior estimates.	
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**12. Please describe below any new state programs or legislation that could impact the without-waiver PTC baseline (e.g., state subsidies, enrollment programs). Please also describe if the state made changes to its projected pass-through funding or state share for the program, parameters, premium reduction, or size of the reinsurance program in light of the recent change in federal law, the Inflation Reduction Act of 2022, compared to the state’s original projections.**

The state adopted new reinsurance payment parameters for 2023 as follows (although not in response to the Inflation Reduction Act):

- Attachment Point: \$40,000
- Reinsurance Cap: \$80,800
- Coinsurance: 60%