

Section 1332 of the Patient Protection and Affordable Care Act (PPACA) State Innovation Waivers – Reinsurance Waiver 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 PPACA 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: Montana

A. GRANTEE INFORMATION					
1. Reporting Period End Date: 12/31/22		2. Report Due Date: 9/15/2021		3. Date Submitted: 9/15/2021	
4. Federal Agency and Organization Element to Which Report is Submitted Consumer Information & Insurance Oversight (CCIO)	5. Federal Grant Number Assigned by Federal Agency: SIWIW200014	6a. DUNS Number 082406534	6b. EIN 81-0302402		
7. Recipient Organization Name Montana State Auditor					
Address Line 1 840 Helena Avenue					
Address Line 2					
Address Line 3					
City Helena	State MT	Zip Code 59601	Zip Extension		
9. Grant Period End Date Dec. 31, 2024			8. Grant Period Start Date Jan. 1, 2020		

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

B. PASS-THROUGH FUNDING DATA		
11a. Under section 1332(a)(3), metrics to assist the Departments in calculating pass-through funding for the effective plan year.		
	Value	Comments (if applicable)
i. The final 2022 second lowest cost silver plan (SLCSP) rates for a representative individual (e.g., a 21-year old non-smoker) in each rating area or service area (if premiums vary by geographies smaller than rating areas).	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
ii. Estimate of what the final 2022 SLCSP rates for a representative individual in each rating area would have been absent approval of this waiver.	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
iii. The 2021 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 2021 and 2022 needs to be the same, so please use the 2022 service areas for both years of data.	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
iv. The total amount of all premiums expected to be paid in the non-group market for the 2022 plan year.	\$370,894,460	Please see accompanying report for methodological details
v. Estimate of what total premiums would have been for the 2022 plan year without the waiver.	\$407,464,580	Please see accompanying report for methodological details

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vi. The amount of advance premium tax credit (APTC) paid by month and rating area for the current 2021 plan year to date.	[Please complete as part of the spreadsheet provided to SBE states only.]	[Please complete as part of the spreadsheet provided to SBE states only.]
vii. The number of APTC recipients by month and rating area for the current 2021 plan year to date. In addition, the state should provide the state specific age curve premium variation for the current and upcoming plan year;	[Please complete as part of the spreadsheet provided to SBE states only.]	[Please complete as part of the spreadsheet provided to SBE states only.]
viii. For SBE states, the month for which APTC began reflecting the general expansion of PTC under the American Rescue Plan Act (ARP) and the month for which APTC began reflecting the availability of PTC to unemployment insurance recipients under the ARP. Note that this information is required to provide context for the data items requested in items 11a.vi and 11a.vii above.	Not applicable	

xi. Estimate of total reinsurance reimbursements for the 2022 reporting year.	\$45.6 million	Please see accompanying report for methodological details
x. Estimate of total 2022 enrollment for the market.	53,633	Please see accompanying report for methodological details
xi. Estimate of what total 2022 enrollment for the market would be without the waiver	52,938	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.

	Narrative
i. For the estimate of what the final SLCSP rates for a representative individual in each rating area would have been in 2022 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 estimated for each carrier based on 2020 claims continuance tables provided by the issuers trended to 2022 and the reinsurance parameters in effect for 2022. The risk adjustment payable/receivable for each carrier was also adjusted to account for the difference in statewide average premiums. Adjustments to claims for worsened morbidity and to variable expenses were also considered. Rates with the waiver were then increased by the corresponding impact by carrier, and a SLCSP was identified for each county based on these rates.

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<p>ii. For the estimate of what total premiums would have been for the plan year (2022) without the waiver, provide a narrative that includes information on the methods and assumptions used to estimate this data.</p>	<p>Please see the accompanying methodological document for full details. The average premium increase was developed as described in the above section 11.b.i. 2022 enrollment was estimated to decrease as a result 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.</p>
<p>iii. An explanation on why the experience for the reporting year (2022) 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. The state should also explain changes to the estimated reinsurance estimates relative to prior estimates.</p>	<p>Please see the accompanying methodological document for full details. Premiums and enrollment varied from previous estimates in that they include a) actual 2021 experience through June, b) 2022 rate filing information, and c) more up to date information on the impact of COVID and ARP on 2021 and 2022 enrollment. Each of these data points are updates from prior estimates.</p>
<p>12. Please describe below any new state programs or legislation that could impact the without-waiver PTC baseline (e.g., state subsidies, enrollment programs).</p>	
<p>None.</p>	