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

Reporting Instructions: Use the following template to capture data for quarterly 1332 waiver grant reporting, as specified in 45 CFR 155.1324(a), and referenced in your grant specific terms and conditions (STC). Quarterly reports are due 60 days following the end of each calendar quarter.

STATE: Montana

A. GRANTEE INFORMATION

1. Reporting Period End Date 9/30/2025			**2. Report Due Date** 12/1/2025
3. 1st Quarterly Report ○	**2nd Quarterly Report** ○	**3rd Quarterly Report** ◉	**4. Federal Agency and Organization Element to Which Report is Submitted** Consumer Information & Insurance Oversight (CCIIO)
5. Federal Grant Number Assigned by Federal Agency SIWIW200014	**6a. DUNS Number** 082406534		**6b. EIN** 81-0302402
7. Recipient Organization Name Montana State Auditor, Commissioner of Securities and Insurance (CSI)			
Address Line 1 840 Helena Avenue			
Address Line 2			
Address Line 3			
City Helena	**State** MT		**Zip Code** 59601
Zip Extension		**8. Grant Period Start Date** January 1, 2020	
9. Grant Period End Date December 31, 2029			
10. Other Attachments (attach other documents as needed or as instructed by the awarding Federal agency) Montana Reinsurance Program Quarterly Operational Report as of 9/30/2025			

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B. REPORT CERTIFICATION

11. Certification: I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.

11a. Typed or printed name and title of Authorized Certifying Official	**11b. Signature of Authorized Certifying Official**
Mark Mattioli, Senior Legal Counsel	Mark Mattioli Digitally signed by Mark Mattioli Date: 2025.11.26 09:39:33 -07'00'
11c. Telephone (area code, number, and extension) (406) 444-2406	**11d. E-mail address** Mark.Mattioli@mt.gov

11e. Date report submitted (month/day/year)

November 26, 2025

C. PROGRESS OF SECTION 1332 WAIVER - General

12. Provide an update on progress made in implementing and/or operating the approved 1332 waiver.

(1) Operational Expenses - All 2025 operational expenses have been paid from draws on the federal grant. Please refer to attached Quarterly Operational Report for details.
All expected reinsurance reimbursement requests for plan year 2024 were received by August 15, 2025. Analysis of of the requested information is in progress. Reinsurance payments are on track for payment to eligible carriers no later than December 31, 2025. As of the date of this report, MT CSI is anticipating that allowable reinsurance claims will exceed funding available for plan year 2024, necessitating proration of final payments.

(2) Plan Year 2026 Pass-Through Reporting was extended to November 14, 2025 due to legal challenges requiring carriers to resubmit affected qualified health plans.

13. Describe any implementation and/or operational challenges, including plans for and results of associated corrective actions. After the first quarter, only report on changes and/or updates, as appropriate.

The Montana Reinsurance Association did not face implementation or operational challenges in Q3 2025. We do note that the Chairperson of the Board of Directors resigned in early November due to a job

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change. A replacement board member has been named by the insurer, and the Association is working with the board to identify a chairperson.

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D. POST-AWARD FORUM

(for Quarter Post-Award Forum was held)

14. Was the date, time, and location of the Post-Award Forum advertised 30 days in advance?

(●) **Yes**

( ) **No**

15. State website address where Post-Award Forum was advertised

mtreinsurance.org/public-meetings-and-notices/

16. Date Post-Award Forum took place

July 29, 2025 at 4:00 p.m.

17. Summary of Post-Award Forum, held in accordance with §155.1320(c), including all public comments received and actions taken in response to concerns or comments.

A post-award public forum was held on July 29, 2025 on Montana CSI premises and via Microsoft Teams dial-in. No public comment was received. Please see attached minutes. No written comments were received.

18. Other Attachments (attach other documents as needed pertaining to Post-Award Form

Minutes from the annual MRA Public Forum held July 29, 2025

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