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 Mar 31, 2026			**2. Report Due Date** May 29, 2026
3. 1st Quarterly Report (●)	**2nd Quarterly Report** ( )	**3rd Quarterly Report** ( )	**4. Federal Agency and Organization Element to Which Report is Submitted** Centers for Medicare & Medicaid Services, 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 3/31/2026			

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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**
Molly VandeVoort, Attorney	Molly VandeVoort Digitally signed by Molly VandeVoort Date: 2026.05.28 09:28:17 -06'00'
11c. Telephone (area code, number, and extension) (406) 444-1295	**11d. E-mail address** molly.vandevoort@mt.gov

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

05/29/2026

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 2026 operational expenses to date have been paid from draws on the federal grant. Please refer to the attached Quarterly Operational Report for details.

Eligible carriers must submit their reinsurance reimbursement requests for the 2025 benefit year by August 15, 2026. After careful review of those submissions, reimbursement for claims will be paid in the fourth quarter using a combination of state funds and federal grant funds.

(2) Updates to the Plan of Operation — There were no changes to the Plan of Operations during the first quarter of 2026. The current Plan of Operations was adopted by the Board on May 28, 2025, and approved by the Commissioner on June 9, 2025.

(3) Update on 2024 Benefit Year Reinsurance Payments — All 2024 benefit year reinsurance payments were completed by the required December 31, 2025 deadline. Total qualifying 2024 plan year claims were approximately $57.8 million, compared to approximately $52 million in available funding. A proportional reduction was applied across participating carriers. This was the first benefit year in which the program required a proportional reduction due to insufficient funding.

(4) Cost Containment — The Office of the State Auditor (SAO) requires health insurers doing business in Montana to file an annual report disclosing their utilization review plan and activities. This report is due

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March 1st of each year. A summary of the agency's review of the filed reports was provided in the annual report filed in early 2026.

(5) CSI Staffing Changes — CSI designated Molly VandeVoort, Attorney, as the new contact for the Section 1332 Waiver Program, replacing Mark Mattioli. Required notifications have been made to CMS.

(6) MRA Board Changes — At the January 29, 2026 Board meeting, Blair Fjeseth was appointed as Board Chair. Additionally, the CSI-appointed board member, Beau Larson, resigned in January due to a job change. The CSI appointed Dr. Stephen Tahta, representing Cigna Healthcare, to replace Beau Larson. Cigna Healthcare is currently a member of the Montana Reinsurance Association.

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 Q1 2026.

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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

Not applicable for this quarter.

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.

Not applicable for this quarter.

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

Not applicable for this quarter.

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