


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:

A. GRANTEE INFORMATION			
1. Reporting Period End Date 06/30/2024		2. Report Due Date 08/31/2024	
3. 1st Quarterly Report <input type="radio"/>	2nd Quarterly Report <input checked="" type="radio"/>	3rd Quarterly Report <input type="radio"/>	4. Federal Agency and Organization Element to Which Report is Submitted Consumer Information & Insurance Oversight (CCIIO)
5. Federal Grant Number Assigned by Federal Agency 1 SIWIW190005-01-00	6a. DUNS Number 160208815		6b. EIN 016000001
7. Recipient Organization Name State of Maine - Maine Guaranteed Access Reinsurance Association			
Address Line 1 254 Commercial Street			
Address Line 2			
Address Line 3			
City Portland	State ME		Zip Code 04101
Zip Extension		8. Grant Period Start Date Jan 1, 2019	
9. Grant Period End Date 12/31/27 (Grant Period Extension approved 7/15/22)			
10. Other Attachments (attach other documents as needed or as instructed by the awarding Federal agency) Summary of MGARA 2024 Post-Award Public Forum			

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B. REPORT CERTIFICATION	
<p>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.</p>	
<p>11a. Typed or printed name and title of Authorized Certifying Official</p> <p>Christopher E. Howard Secretary, General Counsel Authorized Organizational Representative</p>	<p>11b. Signature of Authorized Certifying Official</p> 
<p>11c. Telephone (area code, number, and extension)</p> <p>(207) 791-1335</p>	<p>11d. E-mail address</p> <p>choward@pierceatwood.com</p>
<p>11e. Date report submitted (month/day/year)</p> <p>Aug 29, 2024</p>	
C. PROGRESS OF SECTION 1332 WAIVER - General	
<p>12. Provide an update on progress made in implementing and/or operating the approved 1332 waiver. There has been limited activity through the first six months of 2024, as expected. Through Q2 MGARA results are tracking to budget. Assessment revenues YTD were \$7,230,426. Section 1332 grant funding estimate of \$45,726,151 was received in the quarter with draws under the 1332 grant expected to begin in Q3. Claims are tracking behind budget for the YTD at t\$14,794,752, but experience has shown that low early claims levels are to be expected, with a steep ramp up during Q3 and 4. MGARA closed the first six months with a Fund Balance of \$29,980,805 vs. a projected year end Fund Balance of \$43,700,000. No adjustments are being made to 2024 projected results.</p>	
<p>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.</p> <p>No operational challenges have been experienced in 2024 YTD.</p>	

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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

The notice was published on two websites: www.mgara.org and www.maine.gov/pfr/insurance/

16. Date Post-Award Forum took place

2024 Forum was held June 28, 2024 at 10 AM ET.

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.

The Summary of Post-Award Forum held June 28, 2024 is attached to this report.

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

None

State of Maine

Maine Guaranteed Access Reinsurance Association

SUMMARY OF ANNUAL 2024 POST AWARD PUBLIC FORUM

Pursuant to 31 CFR §33.124 and 45 CFR §155.1324

As Specified in Innovation Waiver Specific Terms and Conditions Section 11

Introduction: Pursuant to 31 CFR §33.120(c) and 45 CFR §155.1320(c), the Maine Bureau of Insurance (“MBOI”) and the Maine Guaranteed Access Reinsurance Association (“MGARA”) jointly held a public forum on June 28, 2024 at 10:00 am ET in a hybrid format with an in-person session held at the offices of the Maine Department of Professional and Financial Regulation, 76 Northern Avenue, Gardiner, Maine and a virtual session via Zoom video conference, at which the public was afforded an opportunity to provide comment on the progress of the State of Maine Section 1332 Innovation Waiver (the “Waiver”). Written comments were accepted through July 12, 2024.

Process: The MBOI and MGARA both published the date, time and location of the public forum in a prominent location on the MBOI’s public web site and MGARA’s public web site at least 30 days prior to the date of the public forum.

Record: The forum was jointly hosted by Maine Superintendent of Insurance Robert Carey and Christopher Howard, MGARA’s Authorized Organizational Representative. The forum was also attended by members of the MBOI staff, including:

Mary M. (“Marti”) Hooper, ASA, MAAA, Life and Health Actuary
Tim Schott, Deput Superintendent
Nathan McIvor
Tessa Tillman
Brock Bubar
Sherry Worth
Josh Winters

Following introductory statements by Superintendent Carey, a role call was taken to identify the attendees. The following attendees were identified:

Joan Cohen, Maine Department of Professional and Financial Regulation
Dan Demeritt, Maine Association of Health Plans
Colleen McCarthy Reid, Esq., Office of Policy and Legal Analysis Maine Legislature

Charlie Soltan, Industry Lobbyist
Sherree Craig, Senior Account Executive in the Benefits Division at Allen Insurance
Kristen Hughes, MaineHealth
Katie Matthews
Laura Pendergast, Actuary and Manager of Pricing at Harvard Pilgrim Health Care
David Regan, Actuary, Harvard Pilgrim
Meg Garrett-Reed, Executive Director, Maine Office of Affordable Health Care
Kate Ende, Maine Consumers for Affordable Health Care

Public comment was provided by Dan Demeritt, Executive Director, Maine Association of Health Plans (“MAHP”). Mr. Demeritt commented that as of January 1, 2025 MGARA will have operated in a merged market (Individual and Small Group Markets) for two years and that the MAHP is concerned regarding the decline in the “value” of the program to the market from approximately 17% in 2022 to 7% in 2024 and a projected 7% in 2025. Expanding the pool covered by the MGARA program without a corresponding increase in revenue results in a program that is less rich and of lower value. MAHP believes that drawing down the MGARA surplus to offset the expansion of risk associated with the inclusion of the small group market is not a viable long-term strategy for delivering program value and relevancy.

The Maine Association of Health Plans believes policy makers and market participants should enter the new plan year with a shared commitment to understanding the impact of the market merger on the health and competitiveness of Maine insurance markets. MAHP believes market participants and policy makers should build on this understanding to identify collaborative policy solutions that directly improve Maine's reinsurance program and start conversations about innovations that can strengthen Maine's private insurance markets and deliver greater value to consumers..

There was no further public comment.

The meeting notice informed the public that written comments would be accepted by email to Stacy.L.Bergendahl@maine.gov through 5:00pm EST on July 12, 2024.

Written comments were subsequently submitted by Mr Demeritt on behalf of MAHP and Kristine M. Ossenfort, Senior Government Relations Director, Anthem.

- Mr Demeritt’s comments largely tracked his in person comments provided at the Forum.

- Ms. Ossenfort commented that the value and impact of MGARA”) has been diminished following the merger of the individual and small group markets and the corresponding changes made to the MGARA program as a result of the amended section 1332 waiver. She echoed the comments oof the MAHP and recommend that the Bureau of Insurance convene a stakeholder group to examine other policy options and solutions that could serve to maximize the impact of the MGARA program and strengthen the individual and small group market segments in Maine.