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

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). For Plan Year 2026 pass-through funding reports are due no later than October 15, 2025, in order to inform pass-through funding calculations, but we encourage submission earlier than that date if possible. The pass-through funding amount will be reported to the state as soon as practicable, conditional on timely receipt of this report.

STATE: Maine

A. GRANTEE INFORMATION			
1. Reporting Period End Date 12/31/25	**2. Report Due Date** 11/14/25	**3. Date Submitted** 11/10/25 - Amended 1/7/26	
4. Federal Agency and Organization Element to Which Report is Submitted Consumer Information & Insurance Oversight (CCIIO)	**5. Federal Grant Number Assigned by Federal Agency** SIWIW190009-01-00	**6a. UEI Number** 004493515	**6b. EIN** 45-4331075
7. Recipient Organization Name Maine Guaranteed Access Reinsurance Association			
Address Line 1 c/o Christopher E. Howard			
Address Line 2 Pierce Atwood LLP			
Address Line 3 254 Commercial Street			
City Portland	**State** Maine	**Zip Code** 04101	**Zip Extension**
8. Grant Period Start Date 12/31/2027 (as extended via approval letter 7/15/22)		**9. Grant Period End Date** 1/1/2019	

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

- CMS Required Spreadsheet Responses to Question 11a.

- Milliman 2025 MGARA Report to Estimate 2026 Pass-Through Funding dated October 29, 2025

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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 (PY).

	Value	Comments (if applicable)
i. The final 2026 second lowest cost silver plan (SLCSP) rates[1] and plan IDs 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) that are actuarially certified.[2] 1. 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. 2. Please include actuarial memoranda as attachments.	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
ii. Estimates of what the final 2026 SLCSP rates and plan IDs 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 that are actuarially certified.[1] 1. Please include actuarial memoranda as attachments.	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
iii. The 2025 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 2025 and 2026 need to be the same, so please use the 2026 service areas for both years	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]

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of data.		
iv. Where applicable, if the issuer with the with- and/or without-waiver SLCSP changed from PY 2025 to PY 2026 in a given rating or service area, please identify the issuer.[1] [1.] It is understandable that geographies can change year-to-year, and that the change in the issuer offering the SLCSP could be due to differential waiver impacts (e.g., differences in rate increases) or changes in service areas and market participation.	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
v. The total amount of all premiums expected to be paid for individual health insurance coverage for PY 2026.	$891,756,840	From 2026 plan rate filings
vi. Estimate of what total premiums would have been for individual health insurance coverage for PY 2026 without the waiver.	$956,128,193	From 2026 plan rate filings
vii. The amount of advance premium tax credit (APTC) paid by month and rating area for the current PY 2025 to date.	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]

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viii. The number of APTC recipients by month and rating area for the current PY 2025 to date.	[Please complete as part of the spreadsheet.]	[Please complete as part of the spreadsheet.]
ix. The state-specific age curve premium variation for the current and upcoming plan year for the individual and small group markets.	[Please indicate in the spreadsheet if federal or a state-specific version is used. If applicable, provide the state-specific age curve .]	[Please complete as part of the spreadsheet.]
x. Estimate of total reinsurance reimbursements for PY 2026.	$44,551,581 individual and $26,595,009 small group for total $71,146,590	URRT WS1 G43
xi. Estimate of total 2026 enrollment for individual health insurance coverage with the waiver.	64,633	From 2026 plan rate filings
xii. Estimate of what total 2026 enrollment for individual health insurance coverage would be without the waiver.	64,633	Assumed no difference

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 2026 without the waiver, provide a narrative that includes information on the methods and assumptions used to estimate this data, specifying any assumptions related	Maine has 4 carriers participating on the exchange. One new carrier continues to expand their offerings to more counties anticipating statewide eventually. Without the waiver it is expected carriers and plan offerings would be less. Carriers were instructed through bulletin to: include details of the impact of the waiver including merging the market to account for changes in risk adjustment transfers, morbidity, and variable non-benefit expenses

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to issuer participation or plan offerings absent the waiver.	
ii. For the estimate of what total premiums would have been for PY 2026 without the waiver, provide a narrative that includes information on the methods and assumptions used to estimate this data.	For the estimate of premiums without the waiver, carriers first adjusted their assumptions by removing the estimated expected claim recoveries from MGARA. They also adjusted the risk adjustment assumption for the impact of higher statewide premiums and for the increase in morbidity due to the absence of MGARA.

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iii. An explanation on why the experience for PY 2026 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.	The percentage impact that the MGARA program will have on rates is expected to decrease for PY 2026 after updates to the coinsurance parameter were made to ensure the longevity of the program. This is assumed to have little to no impact on enrollment, and prior assumptions remain unchanged outside of one carrier removing assumptions related to changes in market morbidity and risk adjustment.

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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 changes in federal law or policy, such as the Marketplace Integrity and Affordability Final Rule. Additionally, given the expiration of the IRA's enhanced PTCs at the end of PY 2025, please explain how the expiration impacted the state's projections for PY 2026.

There are no new state programs or legislation that could impact the without-waiver baseline.

MGARA's 2026 projections and 2026 reinsurance parameters were adjusted to reflect expiration of EPTCs beginning with the 2026 year. The projected reduction in EPTC subsidies of approximately $118.4 million is projected to result in a corresponding reduction in pass-through funding estimated at approximately $9.5 million. These figures are relative to projections where EPTC subsidies are assumed to be extended to 2026 and assumes similar enrollment patterns for 2025 and 2026.

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