HB 413: Public Stakeholder Meeting #3: Summary of Actuarial Projections

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Maryland Insurance Administration

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Section 1: Latest Reinsurance Projections and Modeled Parameter Changes

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Summary of Current Waiver

Current 1332 projections (as of 7/7/23)

All figures in Millions

	2019	2020	2021	2022	2023	5-Year Total
Reinsurance Costs	$ (353)	$ (400)	$ (468)	**$ (485)**	$ (544)	$ (2,250)
YoY % Growth		13%	17%	4%	12%	
Federal Pass-Throughs	$ 373	$ 447	$ 475	$ 344	**$ 473**	$ 2,112
YoY % Change		20%	6%	-27%	37%	
State Assessment	$ 327	$ 119	$ 124	$ 131	$ 135	$ 836
State share of Reinsurance	$ -	$ -	$ -	$ (66)	$ (71)	$ (137)
Other State Outflows	$ -	$ -	$ (100)	$ (75)	$ (37)	$ (211)
EOY Federal Fund Balance	$ 21	$ 68	$ 75	$ -	$ -	
EOY State Fund Balance	$ 327	$ 445	$ 469	$ 459	**$ 487**	
Average Enrollment	179,708	197,546	207,932	217,687	221,351	
		10%	5%	5%	2%	

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Waiver Extension Projection – ARPA expires

Current 1332 projections (as of 7/7/23)
Assumes no ARPA extension

All figures in Millions

	2024	2025	2026	2027	2028	5-Year Total
Reinsurance Costs	$ (579)	$ (602)	$ (619)	$ (645)	$ (671)	$ (3,116)
YoY % Growth	6%	4%	3%	4%	4%	
Federal Pass-Throughs	$ 474	$ 500	$ 417	$ 436	$ 456	$ 2,283
YoY % Change	0%	5%	-17%	5%	4%	
State Assessment	$ 140	$ 145	$ 150	$ 155	$ 161	$ 752
State share of Reinsurance	$ (104)	$ (102)	$ (203)	$ (209)	$ (216)	$ (833)
Other State Outflows	$ (35)	$ (35)	$ -	$ -	$ -	$ (70)
EOY Federal Fund Balance	$ -	$ -	$ -	$ -	$ -	
EOY State Fund Balance	$ 488	$ 496	$ 443	$ 390	**$ 336**	
Average Enrollment	229,834	231,098	214,212	215,098	216,030	
	4%	1%	-7%	0%	0%	

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Waiver Extension Projection – ARPA Extends

Current 1332 projections (as of 7/7/23)
Assumes ARPA is extended to at least 2028

All figures in Millions

	2024	2025	2026	2027	2028	5-Year Total
Reinsurance Costs	$ (579)	$ (602)	$ (626)	$ (652)	$ (679)	$ (3,138)
YoY % Growth	6%	4%	4%	4%	4%	
Federal Pass-Throughs	$ 474	$ 500	$ 526	$ 559	$ 588	$ 2,647
YoY % Change	0%	5%	5%	6%	5%	
State Assessment	$ 140	$ 145	$ 150	$ 155	$ 161	$ 752
State share of Reinsurance	$ (104)	$ (102)	$ (101)	$ (93)	$ (90)	$ (491)
Other State Outflows	$ (35)	$ (35)	$ -	$ -	$ -	$ (70)
EOY Federal Fund Balance	$ -	$ -	$ -	$ -	$ -	
EOY State Fund Balance	$ 488	$ 496	$ 546	$ 608	**$ 678**	
Average Enrollment	229,834	231,098	232,007	232,969	233,979	
	4%	1%	0%	0%	0%	

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Reinsurance Parameter history

- $20k attachment point, 80% coinsurance, $250k cap used from 2019-2022
- $18,500 AP, 80% coins, $250k cap for 2023
- Back up to $20k AP, 80% coins, $250k cap for 2024
- Approved waiver extension anticipates +$1k to AP to each year to control rate of growth of reinsurance cost and offset trend
- The planned 2025 AP of $21k with 80% coins/250k expected to cover 33.6% of claims in Individual market

Potential Reins Parameter Changes

Premium neutral Options

1. $21k AP, 70% coins, $1M Cap
2. $26k AP, 80% coins, $500k cap
3. $28k AP, 80% coins, $1M cap
4. $35K AP, 90% coins, $1M cap

Potential Reins Parameter Changes

Options that shrink program and raise unsubsidized premiums

1. $25k AP, 80% coins, $250k cap (30.5% of claims, +4% premium impact)
2. $30k AP, 80% coins, $250k cap (27.6% claims; +9% premium)
3. $40k AP, 80% coins, $250k cap (22.9% claims, +16% premium)
4. $50K AP, 80% coins, $250k cap (19.4% claims, +22% premium)

5. $21k AP, 70% coins, $1M cap (29.1% claims, +7% premium)
6. 21K AP, 60% coins, $1M cap (24.2% claims, +14% premium)

Impact of raising AP $2.5k per year

Current 1332 projections (as of 7/7/23)

Assumes no ARPA extension - Increase AP at +$2.5k per year

All figures in Millions

	2024	2025	2026	2027	2028	5-Year Total
Reinsurance Costs	$ (579)	$ (583)	$ (582)	$ (588)	$ (596)	$ (2,928)
YoY % Growth	6%	1%	0%	1%	1%	
Federal Pass-Throughs	$ 474	$ 493	$ 401	$ 413	$ 423	$ 2,205
YoY % Change	0%	4%	-19%	3%	3%	
State Assessment	$ 140	$ 145	$ 150	$ 155	$ 161	$ 752
State share of Reinsurance	$ (104)	$ (90)	$ (180)	$ (176)	$ (173)	$ (723)
Other State Outflows	$ (35)	$ (35)	$ -	$ -	$ -	$ (70)
EOY Federal Fund Balance	$ -	$ -	$ -	$ -	$ -	
EOY State Fund Balance	$ 488	$ 508	$ 478	$ 458	**$ 446**	
Average Enrollment	229,834	230,420	213,086	213,531	214,120	
	4%	0%	-8%	0%	0%	

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Impact of raising AP $5k per year

Current 1332 projections (as of 7/7/23)
Assumes no ARPA extension - Increase AP at +$5k per year

All figures in Millions

	2024	2025	2026	2027	2028	5-Year Total
Reinsurance Costs	$ (579)	$ (551)	$ (525)	$ (509)	$ (498)	$ (2,662)
YoY % Growth	6%	-5%	-5%	-3%	-2%	
Federal Pass-Throughs	$ 474	$ 478	$ 375	$ 374	$ 373	$ 2,074
YoY % Change	0%	1%	-21%	0%	0%	
State Assessment	$ 140	$ 145	$ 150	$ 155	$ 161	$ 752
State share of Reinsurance	$ (104)	$ (73)	$ (150)	$ (135)	$ (125)	$ (587)
Other State Outflows	$ (35)	$ (35)	$ -	$ -	$ -	$ (70)
EOY Federal Fund Balance	$ -	$ -	$ -	$ -	$ -	
EOY State Fund Balance	$ 488	$ 524	$ 525	$ 545	**$ 582**	
Average Enrollment	229,834	229,502	211,455	211,504	211,773	
	4%	0%	-8%	0%	0%	

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Section 2: Cost of offsetting ARPA expiration

ARPA Expiration PMPM Premium Example

Subsidized Premum Impact of ARPA Expiration				
For member selecting benchmark plan				
Age 64, Baltimore metro				
FPL	ARPA	Original AC	% Increase	$ Increase
150%	$0	$65	#DIV/0!	$65
200%	$45	$137	203%	$92
250%	$113	$219	93%	$106
300%	$204	$310	52%	$106
350%	$287	$361	26%	$74
400%	$385	$413	7%	$28
401%	$386	$782	103%	$396

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ARPA Expiration – Aggregate Impact

APTC Shortfall 2026	$149,308,590

Age/FPL	0-18	18-25	26-34	35-44	45-54	55-64	65+	FPL Subtotal
0%-138%	$17,986	$426,188	$890,769	$923,068	$714,615	$832,089	$889,638	**$4,694,352**
138%-150%	$82,516	$914,202	$1,672,990	$1,881,572	$2,001,617	$2,538,342	$238,766	**$9,330,005**
150%-200%	$444,084	$3,978,567	$7,839,764	$7,847,336	$8,729,966	$11,695,937	$741,010	**$41,276,663**
200%-250%	$408,043	$3,225,236	$7,458,028	$6,203,789	$7,432,953	$11,662,673	$508,453	**$36,899,174**
250%-300%	$480,108	$1,618,579	$3,973,125	$3,253,344	$4,675,151	$8,150,576	$271,974	**$22,422,857**
300%-400%	$1,553,049	$1,023,760	$1,111,909	$2,034,694	$3,935,685	$8,093,439	$155,389	**$17,907,924**
400%+	$0	$251	$1,445	$32,418	$109,236	$14,823,109	$1,811,155	**$16,777,615**
Age Subtotal	**$2,985,786**	**$11,186,782**	**$22,948,031**	**$22,176,221**	**$27,599,223**	**$57,796,164**	**$155,389**	**$149,308,590**

- Loss of $149M in federal APTC in 2026 if ARPA expires, which will grow to $157M in 2027 and $166M in 2028
- If state offset the lost subsidy, the reinsurance projection would improve because the expected enrollment loss would not occur.
- Will still be worse than if ARPA gets extended, because per person pass-throughs will be lower.

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Reins Projection if State replaces ARPA

Current 1332 projections (as of 7/7/23)
Assumes State replaces ARPA subsidy when it expires in 2026

All figures in Millions

	2024	2025	2026	2027	2028	5-Year Total
Reinsurance Costs	$ (579)	$ (602)	$ (626)	$ (652)	$ (679)	$ (3,138)
YoY % Growth	6%	4%	4%	4%	4%	
Federal Pass-Throughs	$ 474	$ 500	$ 452	$ 473	$ 494	$ 2,394
YoY % Change	0%	5%	-10%	5%	4%	
State Assessment	$ 140	$ 145	$ 150	$ 155	$ 161	$ 752
State share of Reinsurance	$ (104)	$ (102)	$ (174)	$ (179)	$ (184)	$ (744)
Other State Outflows	$ (35)	$ (35)	$ (149)	$ (157)	$ (166)	$ (543)
EOY Federal Fund Balance	$ -	$ -	$ -	$ -	$ -	
EOY State Fund Balance	$ 488	$ 496	$ 323	$ 142	**$ (48)**	
Average Enrollment	229,834	229,502	211,455	211,504	211,773	
	4%	0%	-8%	0%	0%	

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Section 3: Undocumented Immigrant Subsidies

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Undocumented Immigrant Subsidy Modeling

- Modeled the cost to replicate federal APTC for a given income level
  - Therefore costs are lower if ARPA expires and higher if ARPA is extended (opposite of reinsurance)
- Modeled a range of total costs based on various uptake assumptions
  - Low uptake: 8% of those eligible enroll in a QHP
  - Midpoint uptake: 30% of those eligible enroll
  - High uptake: 51% of those eligible enroll
  - Translates to between 7,500 and 55k new enrollees
  - For the subset of population with incomes below Medicaid/CHIP thresholds, assumptions consistent with Medicaid modeling but lower

Modeled Costs (millions): QHP-eligible incomes (Adults >138% FPL)

Scenario	2026 Estimated APTC Costs -No ARPA	2026 Estimated APTC Costs - ARPA
Low	14.9	26.0
Midpoint	55.0	88.2
High	86.9	142.6

Scenario	2026 Estimated Reinsurance -No ARPA	2026 Estimated Reinsurance - ARPA
Low	7.5	9.7
Midpoint	28.0	35.0
High	44.7	56.7

Scenario	2026 Estimated CSR Costs - No ARPA	2026 Estimated CSR Costs - ARPA
Low	4.6	6.1
Midpoint	17.3	20.2
High	26.6	30.1

Scenario	Total Costs - No ARPA	Total Costs- ARPA
Low	27.0	41.8
Midpoint	100.3	143.4
High	158.2	229.4

Scenario	2026 Estimated New Enroll - NO ARPA	2026 Estimated New Enroll - ARPA
Low	4,067	5,487
Midpoint	15,191	19,791
High	24,249	32,080

Modeled Costs (millions): Medicaid/CHIP-eligible incomes

Scenario	2026 Estimated APTC Costs -No ARPA	2026 Estimated APTC Costs - ARPA
Low	14.4	17.3
Midpoint	48.5	59.6
High	89.8	101.5

Scenario	2026 Estimated Reinsurance -No ARPA	2026 Estimated Reinsurance - ARPA
Low	6.5	7.1
Midpoint	21.8	24.6
High	40.3	41.7

Scenario	2026 Estimated CSR Costs - ARPA	2026 Estimated CSR Costs - No ARPA
Low	7.2	8.1
Midpoint	24.2	27.9
High	44.7	47.6

Scenario	Total Costs - No ARPA	Total Costs- ARPA
Low	28.1	32.5
Midpoint	94.5	112.1
High	174.8	190.8

Scenario	Estimated New Enroll - NO ARPA	Estimated New Enroll - ARPA
Low	3,529	4,029
Midpoint	11,847	13,932
High	21,836	23,603

Undocumented – Phased Approach

- Other states programs for undocumented have been phased in over time rather than implemented all at once
- Typical to prioritize children 0-18 first and seniors age 65+ second
- States then proceed to “fill the gap” and expand upward from 18 and/or downward from 65.
- Helps to address the large uncertainty over the uptake level; controlling the pace at which the program expands

“Midpoint” ARPA Scenario by Age/FPL

	Total APTC Enrollees	33,723					
FPL/Age	0-18	18-25	26-34	35-44	45-54	55-64	65+
0%-138%	1,602	2,137	3,333	3,333	1,168	1,168	152
138%-150%	165	366	366	1,781	618	618	55
150%-200%	388	1,288	1,288	2,434	1,211	1,211	154
200%-250%	291	462	462	1,039	859	859	227
250%-300%	194	414	414	715	364	364	75
300%-400%	-	-	304	870	372	372	58
400%+	-	-	-	-	-	99	74
Total	2,641	4,667	6,166	10,171	4,592	4,691	796

Per Enrollee Annual APTC

FPL/Age	0-18	18-25	26-34	35-44	45-54	55-64	65+
0%-138%	$ 2,646	$ 3,317	$ 3,829	$ 4,358	$ 5,974	$ 8,982	$ 10,168
138%-150%	$ 2,646	$ 3,317	$ 3,829	$ 4,358	$ 5,974	$ 8,982	$ 10,168
150%-200%	$ 2,383	$ 3,053	$ 3,566	$ 4,094	$ 5,711	$ 8,719	$ 9,905
200%-250%	$ 1,630	$ 2,301	$ 2,813	$ 3,342	$ 4,958	$ 7,966	$ 9,153
250%-300%	$ 577	$ 1,247	$ 1,760	$ 2,288	$ 3,905	$ 6,913	$ 8,099
300%-400%	$ -	$ -	$ 10	$ 539	$ 2,155	$ 5,163	$ 6,349
400%+	$ -	$ -	$ -	$ -	$ -	$ 2,586	$ 3,772
Average	$ 2,343	$ 2,960	$ 3,370	$ 3,719	$ 5,242	$ 8,130	$ 8,757

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“Midpoint” ARPA Scenario Detail by Age/FPL

FPL/Age	0-18	18-25	26-34	35-44	45-54	55-64	65+	
0%-138%	4,238,397	7,089,036	12,760,496	14,523,018	6,980,468	10,494,859	1,541,668	57,627,941
138%-150%	436,895	1,212,552	1,399,877	7,759,784	3,691,267	5,549,675	558,601	20,608,650
150%-200%	925,666	3,931,621	4,591,406	9,967,380	6,917,254	10,560,431	1,530,051	38,423,808
200%-250%	474,986	1,063,014	1,299,751	3,471,513	4,260,873	6,845,569	2,080,521	19,496,226
250%-300%	112,011	516,038	728,040	1,636,261	1,419,779	2,513,397	608,101	7,533,628
300%-400%	-	-	3,034	468,604	800,776	1,918,307	368,486	3,559,207
400%+	-	-	-	-	-	255,818	279,970	535,789
	6,187,955	13,812,261	20,782,603	37,826,560	24,070,417	38,138,057	6,967,397	**147,785,250**

Adults 0-138% are the eligible incomes for Medicaid. Children up to 322% are eligible incomes for CHIP

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Section 4: Supplemental State Subsidies

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Supplemental State Subsidy

- Modeled Cost of various levels of supplemental state subsidies
- Subsidies modeled as flat PMPM (except for members who don't need full subsidy to get to $0)
- Reflects those currently eligible for federal APTC
- ARPA scenario is higher because of more enrollees

Scenario	$40 PMPM Subsidy	$75 PMPM Subsidy	$100 PMPM Subsidy	$125 PMPM Subsidy
ARPA	$55,459,728	$102,771,347	$132,732,185	$159,023,586
No ARPA	$55,835,374	$98,265,028	$126,329,443	$151,752,840

Supplemental Subsidy Details – ARPA extends

	Subisidy Amount	$75 PMPM					
Age/FPL	0-18	18-25	26-34	35-44	45-54	55-64	65+	Total by FPL
0%-138%	$0	$0	$0	$0	$0	$0	$0	$0
138%-150%	$0	$0	$0	$0	$0	$0	$0	$0
150%-200%	$518,811	$3,765,516	$6,192,489	$6,921,142	$7,978,652	$9,962,155	$644,946	$35,983,713
200%-250%	$410,559	$2,575,379	$4,844,756	$4,532,077	$5,628,528	$8,179,618	$371,390	$26,542,308
250%-300%	$474,979	$1,336,775	$2,367,034	$2,174,753	$3,244,063	$5,199,327	$181,156	$14,978,086
300%-400%	$2,130,455	$1,215,694	$2,201,433	$2,316,111	$3,554,876	$6,566,441	$123,360	$18,108,370
400%+	$0	$1,941	$1,984	$42,942	$42,103	$6,358,799	$711,101	$7,158,870
Total by Age:	$3,534,804	$8,895,306	$15,607,696	$15,987,026	$20,448,222	$36,266,340	$2,031,954	$102,771,347

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State Cost-sharing Reduction Subsidies

- Started with modeling supplemental state CSR on silver for all those less than 300% FPL, as done in MA.
- Realized that large majority of 200-300% FPL was in gold, and would be lower cost to state to offer CSR off a base gold than a base silver plan. So, modeling assume 200-300% FPL state CSR subsidy available only on gold. Parallel to how NM is administering program.
- Modeled the impact for existing enrollees only, no assumed uptake assumptions from outside the market (did make some assumptions about members changing metal level to obtain the new CSRs)

State CSR Estimate Costs

Estimate cost for state supplemental CSRs						
Based on enrollment assuming ARPA extends						
		State AV	PMPM	Projected	Total	Other
Income Range	Federal AV	Target	Cost	Enrollees	Cost	States?
0-150%	94%	95%	$7.42	187,257	$ 1,389,203	MA (100%-150%)
0-150%	94%	97%	$22.26	187,257	$ 4,167,609	
0-150%	94%	99%	$37.09	187,257	$ 6,946,015	NM
0-150%	94%	100%	$44.51	187,257	$ 8,335,218	CT / MA (<100%)
150% - 200%	87%	90%	$21.73	356,215	$ 7,740,896	
150% - 200%	87%	92%	$36.22	356,215	$ 12,901,494	
150% - 200%	87%	95%	$57.95	356,215	$ 20,642,390	MA/NM
150% - 200%	87%	100%	$94.17	356,215	$ 33,543,884	CT (150-175%)
	(Gold base)					
200-250%	80%	85%	$47.08	230,031	$ 10,830,101	
200-250%	80%	90%	$94.16	230,031	$ 21,660,202	NM
200-250%	80%	92%	$112.99	230,031	$ 25,992,242	MA
	(Gold base)					
250%-300%	80%	85%	$47.08	162,266	$ 7,639,626	NM
250%-300%	80%	90%	$94.16	162,266	$ 15,279,252	
250%-300%	80%	92%	$112.99	162,266	$ 18,335,102	MA

$57M Total for NM Approach

$73M Total for MA approach

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Section 5: Impact of Removing <200% FPL members from Individual market

QHP Impact of expanding Medicaid to 200%

- Loss of current APTC $s funding the <200%
  - If ARPA extends, total projected APTC for 2026 expected to be $766M for current market.
  - Estimated that 55% of APTC goes to those under 200%, which is loss of $421M of APTC if this population moved to Medicaid
- Impact on federal pass-throughs
  - Pass-throughs would fall from $500M in 2026 to $198M if the under 200% population were removed from pool.
  - Reinsurance would also fall, but not by as much. State balance at end of waiver projected to fall from +$336M to -$101M in the ARPA extends scenario, an increase of $437M in additional state costs to cover reinsurance.
- Impact on subsidies for those left in Individual market
  - APTCs expected to fall by 15 to 30%. Rate neutral for those in benchmark plan.
  - Significant premium increases for those who “buy up” to gold and/or CareFirst

Reinsurance Projection w <200% Removed

Current 1332 projections (as of 7/7/23)
Updated ro remove <200% FPL Population

All figures in Millions

	2024	2025	2026	2027	2028	5-Year Total
Reinsurance Costs	$ (579)	$ (428)	$ (439)	$ (456)	$ (475)	$ (2,377)
YoY % Growth	6%	-26%	2%	4%	4%	
Federal Pass-Throughs	$ 474	$ 198	$ 137	$ 145	$ 154	$ 1,107
YoY % Change	0%	-58%	-31%	6%	6%	
State Assessment	$ 140	$ 145	$ 150	$ 155	$ 161	$ 752
State share of Reinsurance	$ (104)	$ (230)	$ (302)	$ (312)	$ (321)	$ (1,270)
Other State Outflows	$ (35)	$ (35)	$ -	$ -	$ -	$ (70)
EOY Federal Fund Balance	$ -	$ -	$ -	$ -	$ -	
EOY State Fund Balance	$ 488	$ 368	$ 216	$ 60	**$ (101)**	
Average Enrollment	229,834	231,098	231,576	232,536	233,545	
	4%	1%	0%	0%	0%	

Subsidized premium impact of <200% Removal

Illustrative Monthly Premum for Age 40					
Assume Optimum Choice will be benchmark (as in 2024)					
250% FPL					
Current rates with high CSR loads on silver					
	Unsubsidized		Post-Subsdy		
	Premium	APTC	Premium		
Benchmark	$352	$239	$113		
BlueChoice Bronze	$265	$239	$26		
BlueChoice Gold	$377	$239	$138		
Rates with low CSR load after <200% FPL removed					
	Unsubsidized		Post-Subsdy		
	Premium	APTC	Premium	% Impact	$ Impact
Benchmark	$287	$174	$113	0%	$0
BlueChoice Bronze	$265	$174	$92	249%	$66
BlueChoice Gold	$377	$174	$203	48%	$66

Enrollment & Expenditure Projections (MDH Hilltop study)

*These scenarios apply the lower and upper bounds, respectively, of the 95% confidence intervals for the estimated population of uninsured adults 20-64 years of age sourced from the 2021 American Community Survey sample for Maryland.

	Projected Enrollment	Projected Annual Expenditure	State Share (50%)	Federal Share (50%)
Best Estimates	**73,650**	**$420,447,064**	**$210,223,532**	**$210,223,532**
Lower Bound of 95% CI*	63,182	$360,516,492	$180,258,246	$180,258,246
Upper Bound of 95% CI*	81,589	$465,546,834	$232,773,417	$232,773,417

Thank You!

Written comments on items discussed today may be submitted to:
jamie.sexton@maryland.gov
by Friday, August 25, 2023

Maryland
INSURANCE ADMINISTRATION

insurance.maryland.gov

THANK YOU FOR ATTENDING

Contact Information:

Maryland Insurance Administration

800-492-6116 | 410-468-2000 | 800-735-2258 (TTY)

insurance.maryland.gov

MDInsuranceAdmin

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