



## Department of Health

**KATHY HOCHUL**  
Governor

**JAMES V. McDONALD, M.D., M.P.H.**  
Commissioner

**JOHANNE E. MORNE, M.S.**  
Acting Executive Deputy Commissioner

November 13, 2023

The Honorable Janet Yellen  
Secretary of the Treasury  
Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, D.C. 20220

The Honorable Xavier Becerra  
Secretary of Health and Human Services  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, D.C. 20201

Dear Secretary Yellen and Secretary Becerra,

The State of New York respectfully requests that the U.S. Department of Treasury and U.S. Department of Health and Human Services grant New York's application for a Section 1332 State Innovation Waiver as soon as possible. With the release of final regulations related to the current Basic Health Program (42 CFR Part 600), we are requesting that consideration of our application resume. Enclosed is an Addendum to New York's May 12, 2023 State Innovation Waiver Application that outlines the state's mid-year implementation approach and provides updated actuarial analysis reflecting updated data.

New York is requesting that Sections 36B(c)(2)(B) and 18071(b) be waived for a period of five years beginning April 1, 2024 through 2028 to enable New York to extend its successful "Essential Plan" program to more low- and moderate-income New Yorkers. This waiver is in compliance with federal guardrails established by Section 1332 of the Affordable Care Act and associated federal regulations.

In last year's budget, New York's Legislature passed and Governor Hochul signed into law, language authorizing the Commissioner of Health expand New York's Essential Plan to individuals with incomes up to 250% of the Federal Poverty Level using Section 1332 waiver authority. This year's budget, New York's Legislature passed and Governor Hochul signed into law, authorizes and outlines the requirements of the program. The Essential Plan currently provides affordable, comprehensive, health insurance to more than 1 million New Yorkers, and under this waiver nearly 100,000 more New Yorkers are estimated to gain access to this program. As outlined in the enclosed actuarial analysis, the waiver is estimated to expand coverage to previously uninsured individuals and save eligible individuals an average of \$4,700 per year.

If implemented by April 1, 2024, the waiver will have the added benefit of smoothing the affordability "cliff" for many New Yorkers who transition from Medicaid, as the state implements the end of continuous coverage requirements under the Consolidated Appropriations Act.

Granting this waiver will allow New York to make important strides in broadening access to affordable health insurance coverage and advancing health equity among the remaining uninsured in New York.

It is the state's intent to include the Deferred Action for Childhood Arrivals (DACA) population in the State Innovation Program upon implementation of the HHS [proposed federal rule](#) to extend Affordable Care Act coverage to DACA recipients. The State is also seeking new federal solutions to support coverage of undocumented New Yorkers, including through the State Innovation Program, and would amend the state's waiver application if there is agreement in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "James V. McDonald, M.D., M.P.H.", written in a cursive style.

James V McDonald, M.D., M.P.H  
Commissioner of Health



**New York Section 1332 Innovation Waiver  
Essential Plan Expansion Updates**

*November 13, 2023*

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## **1: Elimination of \$15 Monthly Premium**

In response to public comments and because of anticipated surplus in expected passthrough funding, New York has decided to eliminate the proposed \$15 monthly member premium for the Essential Plan (EP) expansion group (consumers with incomes above 200% up to 250% of FPL). Extending a premium-free health insurance option to lower-income New Yorkers enabling access to health care fulfills one of NY State of Health's core missions of promoting the health, productivity, and well-being of New Yorkers. Eliminating the monthly member premium strengthens the 1332 Waiver Application's compliance with the affordability guardrail, removes the administrative burdens related to the monthly premiums for consumers, the State, and the health plans, and it further smooths the coverage transition for consumers who are no longer eligible for free coverage in Medicaid due to the post-COVID-19 Public Health Emergency (PHE) "unwind" redetermination effort. If the pass-through funding is insufficient to fully fund covering monthly premiums for members, the State will identify other state funds to cover the balance through annual budget-marking. For example, the Quality Incentive Pool funds are subject to available funds, and the State could consider adjusting the size of this pool as needed.

## **2: Revised Waiver Implementation Plan for 4/1/2024 Start**

Due to the complex nature of New York's 1332 Waiver Application and its intersection with the Basic Health Program (BHP) that has been in effect in New York since 2015, and federal regulation (88 FR 52262, 52542 (Aug. 8, 2023)) pertaining to the BHP<sup>1</sup> was not finalized until November 2, 2023 after Open Enrollment activities were underway, New York has revised the waiver implementation start date to April 1, 2024. As a result, the State is providing information on its revised implementation plan.

During Open Enrollment 2024, consumers received renewal notices under the standard timeframe, and did not receive any information about the EP Expansion. Consumers with incomes above 200% up to 250% of FPL received a notice of Qualified Health Plan (QHP) eligibility. The State has implemented a PHE Unwinding exceptional circumstances Special Enrollment Period that provides that any individual may enroll in QHP coverage up until May 2024. The State expects a nominal impact on enrollment with the mid-year implementation due to IT system functionality and NY State of Health's (NYSOH) ability to auto-enroll QHP-eligible individuals into EP expansion coverage. NYSOH is a fully integrated marketplace across Medicaid, Child Health Plus, Essential Plan and QHPs and has significant overlap of health plan issuer participation (11 issuers participate across all markets).

NYSOH will capture and store eligibility information for consumers with incomes above 200% up to 250% of FPL who are determined eligible for QHPs with tax credits during the annual Open Enrollment Period. By early March, the State will re-run eligibility for all QHP-eligible

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<sup>1</sup> These regulation changes do not impact the waiver's compliance with the 1332 guardrails or eligibility for 1332 pass-through funding.

individuals with incomes above 200% up to 250% of FPL and auto-enroll them to an EP plan starting April 1, 2024. QHP enrollees will be transitioned to the EP plan offered by their same insurer. While the State expects to capture over 70% of expected enrollment through the autoenrollment of existing NYSOH enrollees, the State will also run a robust consumer outreach and advertising campaign to promote the eligibility expansion in order to reach uninsured individuals who may be eligible for this new program. During the 2022 Open Enrollment Period, over 72% of individuals in the 200 – 250% of FPL income cohort were administratively renewed. Paid advertising will be targeted to individuals who are newly eligible for coverage and outreach activities will include partnerships with community-based organizations, other state and city agencies, public libraries, pharmacies, faith-based organizations, and community boards. All of these activities will be informed by data so that we can target efforts to communities and areas of the state where we are most likely to reach eligible individuals.

### **IT System Changes**

The State will implement the EP expansion IT system functionality in by early March to enable an April 1, 2024 effective date. The IT implementation involves:

1. Identifying individuals with active QHP eligibility determinations through NY State of Health with incomes above 200% and up to 250% of FPL who are eligible for the EP expansion;
2. Redetermining consumers' eligibility for EP, mapping current QHP enrollees into their QHP issuer's EP product, and sending them eligibility and enrollment notices to align with these changes;
  - Individuals enrolled with a QHP issuer that does not offer EP products will be auto-assigned to an EP product if they do not select one, analogous to what is done in Medicaid Managed Care today. This circumstance only applies to one issuer with approximately 1% of applicable enrollees.

### **Enrollment Assistor and Customer Service Staff Trainings**

Contemporaneous with the release of consumer notices by early March, NYSOH will send pre-recorded trainings on the EP expansion to enrollment assistors, which will be adapted to Customer Service Center training materials. Since there are no changes to the actual NYSOH application, trainings will focus on the new eligibility result, and the new EP product and benefits. As noted in the State's waiver application, eligibility and benefits for the population with incomes at or below 200% of FPL remain the same under the waiver.

### **Operational Considerations**

As part of its PHE Unwind Plan, NYSOH has already determined that it will allow enrollment into QHPs through the end of its unwind period in May 2024 using the "exceptional circumstances" Special Enrollment Period authority. NYSOH will also offer a one-time, 60-day exceptional circumstances SEP for enrollees who would like to maintain enrollment in their QHP

without financial assistance (45 CFR 155.420(d)(9)). This SEP gives us flexibility on effective dates for enrollment, so we can maintain the status quo for those enrollees who want to keep their QHP (45 CFR 155.420(b)(2)(iii)).

Enrollment in all other state programs – Medicaid, EP and Child Health Plus – is year-round. As a result, all enrollment assistance channels, including enrollment assistors, Customer Service, and the NYSOH website are open for enrollment year-round.

Currently, when a member moves from a QHP to Medicaid/EP/CHP, they receive a new eligibility notice and are enrolled in their QHP issuer’s Medicaid/EP/CHP product, if applicable. Auto-assignment applies to EP and Medicaid, if the QHP issuer does not participate in those plans. If a member moves from Medicaid/EP/CHIP to QHP outside of open enrollment, the member receives a new eligibility notice and NYSOH automatically opens a loss of Minimum Essential Coverage (MEC) Special Enrollment Period for members to come in and pick a plan.

Mid-year implementation considerations:

- All members who have enrolled in a QHP with incomes above 200% and up to 250% of FPL will receive updated eligibility and enrollment notices by March 2, 2024 indicating that they are eligible for Essential Plan beginning April 1, 2024. NYSOH will send this updated eligibility notice to both members who have and have not enrolled in a QHP in 2024. Members will also be informed to look at their updated eligibility information via email, text message, and through enrollment assistors connected to their accounts. In 2022 and 2023 the State has worked with Ichor Strategies to facilitate a series of community dialogues to fine tune consumer messaging through various modalities, including direct to consumer messaging. More recently, the State worked with the US Digital Service (USDS) to update text message, information website, and direct mail content to consumers based on feedback from consumers, navigators, and USDS digital experts. Finally, consumers would receive a welcome letter and ID card from their health plan.
- NYSOH’s application process includes language informing QHP-eligible consumers who apply APTC towards reducing their monthly premiums of their obligation to reconcile APTC received if there are changes in income throughout the year. The State will issue these members a Form 1095-A in early 2025 (for the 2024 tax year) with a cover letter reiterating the requirement to reconcile their APTC using IRS form 8962. This is consistent with current operations when NYSOH members move between public programs, like Medicaid or EP, and QHPs. All members who had at least one month of QHP coverage in a given Plan Year receives a Form 1095-A with a cover letter containing instructions.
- To ensure that consumers who switch from a QHP to an EP effective April 1, 2024 are “made whole” for out-of-pocket spending while enrolled in a QHP, NY will issue guidance encouraging participating QHP issuers to carry over consumers’ maximum out-of-pocket spending accumulators to date from their QHP to their EP with the same issuer, in line with past examples where issuers extended this policy to consumers. The State had initial discussions on October 11, 2023 with Health Plan Associations and consumer

groups about the State's policy requesting issuers to carry over accumulators for members and has not received concerns or opposition to this policy to date. This is consistent with what was done after the American Rescue Plan Act entitled individuals who received or were determined eligible to receive unemployment insurance benefits to move to the 94% AV Silver Plans with Cost-Sharing Reductions, regardless of income. Participating insurers carried over members' out-of-pocket spending accumulators to their new product without requiring any additional member actions, assuming they stayed enrolled with the same issuer. NY will also facilitate the transfer of accumulator information between issuers in order to extend the same benefit to EP members who newly enroll with a different EP issuer from their QHP issuer.

#### Timeline for Implementation.

- **By March 2, 2024:** EP expansion eligible individuals will receive updated eligibility and enrollment notices telling them they are eligible for the EP, which plan they have been automatically enrolled into, and how to shop for and change their health plan. Health plans will receive 834 enrollment transactions for all NYSOH members, including the EP expansion population. All members will be mapped to the EP product offered by the member's QHP issuer. For members whose QHP issuer is not in EP (this impacts about 1% of applicable enrollees with one issuer), they will be auto-assigned to an EP product if they don't pick a plan in 10 days, consistent with NYSOH's Medicaid Managed Care Auto-assignment rules.
- **April 1, 2024:** Coverage takes effect for all EP expansion members.
- **End of April:** Health plans are paid for EP expansion members for April.

#### **Public Education Campaign**

The State will develop outreach and education campaign plans to promote the EP expansion to eligible individuals. NYSOH has significant experience promoting Open Enrollment, the launch of the State's EP in 2016, and most recently a robust public education campaign around the PHE unwind. NYSOH engages in an annual outreach and advertising campaign, typically focused on Open Enrollment, but in recent years has been year-round to promote messaging around the PHE unwind. For CY2024, NYSOH has an advertising and outreach budget of \$16 million; approximately \$2.5 million of this budget will be allocated to promote this EP expansion inclusive of message development, paid advertising, and community outreach activities. This advertising campaign will begin in February 2024 and continue throughout the year to ensure awareness of this new coverage option.

The State will leverage data sources, including both NYSOH administrative data and survey data, such as U.S. Census Bureau American Community Survey data, to identify the demographics and locations of the eligible population and target outreach and advertising accordingly. Advertising will run across various platforms including digital and print. The outreach campaign, which will be ongoing, will also include educational materials such as fact sheets, organic social media, targeted emails and text messages, awareness events statewide, notifying consumers of this new coverage option.



Once the IT system change is implemented, NYSOH intends to redetermine eligibility for individuals in the 200-250% of FPL group, which will trigger the receipt of:

- **Text messages:** Informing them that there is a new eligibility and enrollment notice available in their NYSOH account. Consumers will receive a text message contemporaneous with the updated eligibility and enrollment notices being generated and another 2 weeks before their new coverage begins.
- **Email outreach:** Emails indicating that individuals are eligible for a new program and will be enrolled in a plan, unless they opt-out. Consumers will receive an email contemporaneous with the updated eligibility and enrollment notices being generated and another 2 weeks before their new coverage begins.
- **Assistor/Health Plan outreach:** Associated certified enrollment assistors (or health plans for members without assistors), will be provided lists of their members who are eligible for EP Expansion coverage and asked to perform outreach and make any changes to enrollment.

### 3: Insurer Reimbursement Implementation Plan (IRIP)

In order to address public comments received during the initial federal comment period held from June 7, 2023 through July 5, 2023 concerning the stability of the individual market, the State evaluated several options to mitigate the impact of its 1332 Waiver on individual market premiums as the 200 – 250% of the Federal Poverty Level (FPL) population transitions out of the market into the Essential Plan. The State provided a draft of its plan to the Departments on August 23, 2023 to use some of the surplus passthrough funding each year the waiver is in effect to provide a reimbursement to insurers in lieu of approving the higher, with waiver individual market premium rates. A federal comment period was opened from August 23, 2023 through August 30, 2023.

Based on the comments received, the State has decided to implement the IRIP as part of its 1332 Waiver. Under this scenario, DFS will approve insurers' with-waiver, with-IRIP rates (defined as the rates that would have been set if the 200 – 250% of FPL population stayed in the individual market) for each plan year. This approach has several benefits:

- 1) **Lowens Premiums for Consumers:** Consumers in the individual market will not experience an increase in premiums due to the waiver. This means there is no difference in affordability for consumers remaining in the individual market with and without the waiver. It also means that there is no longer an expected decline in individual market enrollment beyond the transition of the 200-250% of FPL group into the Essential Plan.
- 2) **Makes Insurers Whole:** Insurers will be provided a reimbursement for the lost revenue under the waiver in lieu of passing along increased costs to consumers in the form of higher premiums.

- 3) **Impact on Pass-through Funding for New York:** Expected federal spend on advance premium tax credits/premium tax credits (APTCs/PTCs) for consumers is expected to be lower under the waiver after implementing the IRIP (since Second Lowest Cost Silver Plan (SLCSP) premiums would be lower relative to under the waiver *without* implementing the reimbursement program). As a result, the pass-through funding amount would not need to be offset by any increases in the SLCSP premium (since the reimbursement program eliminates SLCSP premium increases due to the waiver, as described in the May 2023 application). Any available pass-through funding would be used to fund the insurer reimbursement program.

Based on the 1332 waiver actuarial and economic analysis and the State's approved 2024 rates, the total insurer reimbursement for PY 2024 is estimated to be \$45 million. The final figure will depend on actual enrollment.<sup>2</sup> This does not change the State's analysis with respect to affordability for those with incomes under 250% of FPL who will transition to the Essential Plan. Under the 1332 Waiver, consumers with incomes above 250% of FPL will experience no change in affordability compared to without the waiver with the implementation of the IRIP. This amount has also been updated to reflect the implementation date of April 1, 2024.

The Single Risk Pool provision of the ACA (PPACA § 1312) and implementing regulations (45 CFR 156.80) require a health insurance issuer to consider "all enrollees in all health plans (other than grandfathered health plans) offered by such issuer in the individual market, including those enrollees who do not enroll in such plans through the Exchange, to be members of a single risk pool." 45 CFR 156.80(d)(2) provides that an "issuer may vary premium rates for a particular plan from its market-wide index rate for a relevant state market based only on the following actuarially justified plan-specific factors." These regulations enumerate specific factors, and limit an issuer's ability to make plan-level premium adjustments to the market-wide index rate based only on those factors. The permitted factors include actuarial value and cost-sharing design; provider network, delivery system characteristics, and utilization management practices; benefits provided in addition to EHBs; and administrative costs. The enumerated factors apply to all plans in the applicable single risk pool. The permitted factors above do not include setting the market-wide index rate as if the population with estimated household incomes 200-250% of FPL were included in the individual market.

Because New York will reimburse insurers for the impact of moving these individuals out of the individual market, excluding these individuals from the risk pool when setting the market-wide index rate would overstate issuers' net cost of providing coverage and result in inappropriately high premiums. To achieve its goals of reducing premiums and ensuring stability for the individual markets, New York is requesting a waiver of PPACA §§ 1312(c)(1) as implemented at 45 CFR 156.80, and any other provisions if necessary to allow issuers in New York to set rates

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<sup>2</sup> Note that \$44M represents the estimated carrier reimbursement in the 1332 Waiver using the data and assumptions reflected in the original waiver submission. This assumed an estimated 2024 rate increase of 6.2%. DFS approved a market-wide rate increase of 13.5% for 2024. The updated \$45M estimate for 2024 is based on this higher premium increase adjusted for 9 months of 2024. Actual reimbursement is dependent upon enrollment.

as if the individual market risk pool continued to include the population with estimated household incomes 200-250 percent of FPL.

## Approach

### *Implementation*

Each year, DFS will collect information from insurers during plan rate filings for both with and without the waiver. Since in New York insurers must receive prior approval of proposed health insurance premiums, insurers must provide justification for every component of the premium increase they request. During this process, DFS reviews and validates the data and justifications in order to issue an approved increase. DFS will then calculate the market-wide average premium increase with and without the waiver.

Given that the State will reimburse insurers for the impact of the waiver, rather than approve the with waiver premium increases, DFS will approve the without waiver premium increases. DFS will be able to confirm that without waiver premiums were appropriately determined under the assumption that the risk pool still includes the population with incomes 200 – 250% of FPL by using data that DFS has already collected as well as data that DFS will collect in the future. Please see the Appendix for additional details on the guidance that was issued by DFS to insurers for estimating the impact of the 1332 Waiver in their 2024 rate filings.

Based on discussions with health plan associations, the State will calculate the reimbursements on a retrospective basis and make quarterly payments to insurers. To calculate the insurer reimbursement, the State will require insurers to provide data to determine their premium shortfall from having not included the migration of the 200 – 250% of FPL population out of the individual market in their pricing.

This approach has been reviewed and discussed with the health plan associations on August 11, 17, and 18, 2023. The State does not believe there will be issues with liquidity given the quarterly reimbursements, especially given the relatively small impact the waiver is expected to have on individual market premium rates. Retrospective payments are also common in other programs targeted at premium reductions in the individual market, such as reinsurance, risk adjustment, risk corridors programs. DFS will continue to monitor insurers liquidity and recommend modifying the payment schedule if necessary.

### *Data Collection & Reimbursement Calculation Methodology*

In the beginning of the third quarter of the year, DFS will collect data sufficient to calculate each insurer's respective reimbursement using the reimbursement parameters below. Please see the Appendix for an example of the data that DFS collected from insurers to determine the impact of the 1332 Waiver on 2024 premium rates.

### *Reimbursement Parameters*

Carriers in the individual market can qualify for carrier subsidies based on DFS' evaluation of the information they submit with respect to the amount of earned premium each insurer collects for the applicable plans of insurance sold during the year in question. The State expects that the

carrier subsidy will cost approximately \$45 million for 2024 and \$63 million per year thereafter. However, if actual costs exceed the estimate, the State anticipates being able to use sufficient surplus in annual pass-through funding that could absorb increased costs. If the surplus in annual pass-through funding is insufficient to fully fund the carrier subsidy cost, the State would identify other state funds to cover the balance through annual budget-making. For example, the Essential Plan Quality Incentive Pool funds are subject to available funds, and the State could consider adjusting the size of this pool as needed based on the amount of the final insurer reimbursement amount.

To calculate the insurer reimbursement, the State will require insurers to provide data including the actual earned premiums for the year in question, with respect to the individual market population. The State will then determine what the aggregate premium base for that year would have been in the individual market had insurers actually included a provision for the waiver in their premium rates for the period of the year the waiver would have been in place. Each company would receive a pro-rata share of the aggregate difference between the with and without waiver aggregate premiums.

To compensate insurers for the lost revenue associated with having charged premium rates that did not reflect the migration of the 200 – 250% FPL population to the Essential Plan, at the beginning of each quarter beginning in the third quarter of 2024:

1. DFS will collect data associated with the previous quarter from each insurer; including total earned premium and total member months.
2. For each insurer, DFS will use that data to recalculate the hypothetical earned premium that would have been collected had that insurer charged the “with waiver” premium for the quarter in question (i.e., multiply the actual premium for that quarter by the factor<sup>3</sup> that DFS approved for 2024 to reflect the migration of the 200-250% of FPL population to the Essential Plan (EP) for that company’s “with waiver” version of the approved 2024 premium rates).
3. The difference between the hypothetical earned premium calculated in Step 2 above and the actual earned premium for the quarter will be remitted to the insurer.
4. Payments are expected to be made at the end of the quarter following the quarter upon which payments are based (i.e., payments for Q2 are expected to be made before the end of Q3).

Below is an example of the payment calculation:

- Hypothetical Results for Quarter 2 of 2024 (calculated in July of 2024):
  - i. Company A
    1. Earned Premium: \$39,000,000

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<sup>3</sup> For 2024, DFS reviewed two sets of individual premium rates. One set assumed the transition of the population 200 – 250% of FPL out of the individual market under the 1332 Waiver, without the IRIP, and the other assumed consumers remained in the market for 2024. The two sets of rates differed by an approved factor that reflected the impact of the 200-250% FPL population moving from the individual market to the EP.

2. DFS Approved 1332 Factor: 1.025
  3. Company A's Reimbursement = \$975,000 = (\$39,000,000 \* 1.025 - \$39,000,000)
- ii. Company B
1. Earned Premium: \$24,000,000
  2. DFS Approved 1332 Factor: 1.020
  3. Company B's Reimbursement = \$480,000 = (\$24,000,000 \* 1.020 - \$24,000,000)

### ***Payment***

The State of New York, as approved by the Department of Health, the Office of the State Comptroller, and any third-party fiscal agent of the DOH, will issue payments to insurers.

### ***State Regulations for Issuing Reimbursements***

The State believes that our current enabling legislation, [NY Social Services Law section 369-ii\(1\)](#) along with [NY State Finance Law section 98-d\(3\)](#), contains sufficient authority to implement the subsidy program outlined here. The language is included below:

**NY Social Services Law section 369-ii(1):** *Notwithstanding section three hundred sixty-nine-gg of this title, subject to federal approval, if it is in the financial interest of the state to do so, the commissioner of health is authorized, with the approval of the director of the budget, to establish a 1332 state innovation program pursuant to section 1332 of the patient protection and affordable care act (P.L. 111-148) and subdivision twenty-five of section two hundred sixty-eight-c of the public health law. The commissioner of health's authority pursuant to this section is contingent upon obtaining and maintaining all necessary approvals from the secretary of health and human services and the secretary of the treasury based on an application for a waiver for state innovation. The commissioner of health may take all actions necessary to obtain such approvals.*

**NY State Finance Law section 98-d(3):** *Such fund shall consist of moneys transferred from the federal government pursuant to 42 U.S.C. 18052 and an approved 1332 state innovation program waiver application for the purpose implementing the state plan under the 1332 state innovation program, established pursuant to section three hundred sixty-nine-ii of the social services law.*

The State Departments of Health and Financial Services expect to issue guidance within the second quarter of 2024 to define the methodology for the carrier reimbursement in advance of issuing the payments, allowing for carrier feedback.

The State anticipates that it will continue to refine and improve the implementation of the insurer reimbursement as details are further clarified. This information, including additional specifics of the data collection and calculation methodology, will be communicated to insurers and other stakeholders as necessary through additional bulletins or communications.

## Implementation Timeline

The State will build on top of its annual rate filing cadence to collect information from carriers to evaluate the impact the waiver would have had on the individual market and estimate the reimbursement required to make up for lost revenue. Below is an example timeline for PY 2024.

### Timeline for PY 2024 Estimates and Insurer Reimbursements

|  |  |
|--|--|
| January 2023                                     | DFS begins regular workgroups with issuers to discuss upcoming rate filings.   |
| April 2023                                       | NYSOH releases the Plan Invitation to sell on the exchange.  |
| May – July 2023                                  | DFS collects rate filings and application materials from carriers, including estimates on premium impacts with and without the waiver.   |
| August 2023                                      | DFS identifies the approved with and without waiver premium increases and any differences in carriers’ plans or service areas under the waiver; DFS approves without waiver premium increases.   |
| September 2023                                   | NYSOH uploads premiums and plan information to its website.  |
| September – October 2023                         | DFS communicates further details regarding final insurer reimbursement calculations with plans.  |
| November 2023                                    | Consumers begin enrolling in plans for 2024; consumers between 200 – 250% of FPL enroll in Qualified Health Plans.   |
| January-March 2024                               | The plan year begins. 200-250% of FPL population remains in a QHP through March 2024   |
| April 2024                                       | 200-250% of FPL QHP eligible population moves to Essential Plan.   |
| Second Quarter 2024<br>(April – June 2024)       | DFS issues guidance to define the methodology for the carrier reimbursement for Quarters 2 – 4 of PY 2024.   |
| Third Quarter 2024<br>(July – September 2024)    | DFS calculates insurer reimbursement for each plan for Quarter 2 based on the difference between the plans’ actual earned premium and their recalculated earned premium reflecting the with-waiver, without-IRIP version of approved premium rates. NYSoH issues payment to issuers based on DFS calculations.   |
| Fourth Quarter 2024<br>(October – December 2024) | DFS calculates insurer reimbursement for each plan for Quarter 3 based on the difference between the plans’ actual earned premium and their recalculated earned premium reflecting the with-waiver, without-IRIP version of approved premium rates. NYSoH issues payment to issuers based on DFS calculations.   |
| December 2024                                    | The plan year ends.  |
| First Quarter 2025<br>(January – March 2025)     | The claims runout period for the preceding plan year ends.<br>DFS calculates insurer reimbursement for each plan for Quarter 4 based on the difference between the plans’ actual earned premium and their recalculated earned premium reflecting the with-waiver, without-IRIP version of approved premium rates. NYSoH issues payment to issuers based on DFS calculations. |

## Public Comments Received on the IRIP and State Responses

The Federal Government held an additional comment period from August 23, 2023 through August 30, 2023 on the State's IRIP addendum submitted on August 23, 2023. The addendum was posted on the CMS Section 1332 Waiver website and New York shared the addendum and comment period information with the same stakeholder groups as the initial federal comment period.

The State engaged with stakeholders during the federal comment period to discuss and revise the proposed Insurer Reimbursement Implementation Plan (IRIP). This engagement included a series of calls on August 11, August 17, and August 18 with representatives from the Departments of Health and Financial Services and New York's Health Plan Associations to describe the IRIP with a focus on how the IRIP would impact the premium rates paid to health plans. During the federal comment period, the State notified consumer groups, health plan associations, and health provider associations that the IRIP Addendum to the 1332 Waiver had been submitted and that CMS opened a public comment period and encouraged these groups to review and comment on the plan. In addition, the State engaged with representatives from a NYS Provider Association on August 24, a Consumer Advocacy organization on August 29, and responded to questions from a NYS Senate/Health Committee Office on August 30 about the IRIP.

A total of seven comments were received during the federal comment period. Two comments were from the same organization. Five commenters supported the State's plan to mitigate premium increases in the individual market. One commenter was opposed to the implementation of the IRIP. In response to public comments received and questions from the Departments, New York submitted a revised addendum to its waiver application on September 7, 2023.

### ***State Response to Public Comments from Federal Comment Period Held August 23 through August 30, 2023***

The State reviewed all comments as a matter of policy and appreciates the input received. All comments were considered equally. The following outlines the predominant themes from commenters:

- Support for IRIP and positive impact on the individual market
- Request for more frequent IRIP payments
- Request for the State to consider alternatives to IRIP
- Concern the IRIP will disproportionately benefit higher income New Yorkers
- Recommendation that the IRIP have an upward payment guardrail
- Request to include coverage of undocumented immigrants
- Inadequate notice for the public comment period

### Support for IRIP and the positive impact on the individual market

*Summary of Comments:* Five of the commenters supported the State's plan to implement a IRIP to mitigate increases in premiums in the individual market from the EP Expansion under the

1332 Waiver. Commenters said it will shield consumers from increased premiums and add additional savings for those with lower income levels.

*State Response:* Consistent with these comments, the State is retaining IRIP as part of the waiver plan.

Request for more frequent IRIP payments

*Summary of Comments:* Some commenters supported payments on a more frequent basis rather than implementing a reconciliation after the run out of the plan year as initially described in the August 23, 2023 addendum.

*State Response:* In response to these comments, the State modified its addendum to reimburse insurers on a quarterly basis once the EP Expansion begins.

Request for the State to consider alternatives to IRIP

*Summary of Comments:* Some commenters offered alternative suggestions for addressing potential risk pool impacts of the waiver such as leveraging reinsurance or other methods like risk adjustment to provide stability for issuers using a more established methodology.

*State Response:* The State may consider alternate options in future years to offset the waiver's impact on the individual market, such as a risk adjustment or reinsurance program. Due to the complexity of implementing those programs, the State decided to include an Insurer Reimbursement Implementation Plan but plans to explore other options for future waiver updates.

Concern the IRIP will disproportionately benefit higher income New Yorkers

*Summary of Comments:* One commenter was concerned that the IRIP, and associated decrease in premiums in the individual market, will primarily support consumers who buy off exchange and whose income exceeds the threshold for tax credits.

*State Response:* Stabilizing premiums have market-wide benefits.

Recommendation that the IRIP have an upward payment guardrail

*Summary of Comments:* One commenter voiced concerns with the methodology insurers would use to potentially inflate reimbursements and that the IRIP does not have an upward cap on the carrier reimbursement amount.

*State Response:* Based on this comment, the State modified its payment methodology and schedule to reflect actual market experience instead of using initial projections. Additionally, insurers must receive prior approval of proposed health insurance premiums and must provide justification for every component of the premium increase they request, including the impact of the 1332 waiver on rates. During this process, DFS reviews and validates the data and justifications in order to issue an approved increase.



#### Request to include coverage of undocumented immigrants

*Summary of Comments:* One commenter expressed support for the State to expand Essential Plan coverage to undocumented immigrants.

*State Response:* The State does not currently have plans to expand coverage to undocumented immigrants.

#### Inadequate notice for the public comment period

*Summary of Comments:* One commenter expressed concern that not enough notice was given to other stakeholders about the addendum and public comment period.

*State Response:* The State shared information with the same stakeholder groups that were notified during the 1332 Waiver Application public comment period.

## **4: DFS Instructions to Insurers on Estimating the Impact of the 1332 Waiver in 2024 Rate Filings**

The information below was sent to health plan actuaries in order to provide guidance on estimating the impact of the 1332 waiver on 2024 rate filings.

### ***Data Request***

Attention Health Plan Actuaries:

Please submit your response to this data request using the attached data template. Note that we added a column for “Allowed” claims.

Also, to address the fact that all family members may not be insured under the same policy, when attempting to identify individuals in the 200-250% FPL band, for purposes of determining the appropriate 250% FPL family income in the table below, the following assumptions should be used:

- Single Rating Tier: Assume 1 additional family member (2 in total); and
- Single + Spouse Rating Tier: Assume 1 additional family member (3 in total); and
- Single + Child(ren) Rating Tier: Assume 1 additional family member than what was reported by the policyholder; and
- Single + Spouse + Child(ren) Rating Tier: Assume 0 additional family members (use the number reported by the policyholder); and
- Child Only Rating Tier: Assume 2 additional family members (3 in total); and
- Assume that all individuals enrolled in the “Silver 73%” plan fall into the 200-250% FPL band (even if they are not captured using the assumptions above).

**2021 ANNUAL FAMILY INCOME**

| <b>Family Size</b>             | <b>250% FPL</b> |
|--------------------------------|-----------------|
| <b>1</b>                       | 32,200          |
| <b>2</b>                       | 43,550          |
| <b>3</b>                       | 54,900          |
| <b>4</b>                       | 66,250          |
| <b>5</b>                       | 77,600          |
| <b>6</b>                       | 88,950          |
| <b>7</b>                       | 100,300         |
| <b>8</b>                       | 111,650         |
| <b>Each add'l person, add:</b> | 11,350          |

**Updated Examples:**

- **Example 1:**
  - For a single adult purchasing the SLCSP in Albany (1 person being insured):
    - The SLCSP in Albany in 2022 for an single adult purchaser was \$564.85
    - Assume one additional family member per the assumptions above (2 in total)
    - Using the table above, the applicable 2021 Family income is \$43,550
    - $\$43,550 / 12 = \$3,629.17$
    - The maximum amount this policyholder would have paid in 2022 is \$145.17 (4.0% of \$3,629.17) per month
    - Using these assumptions, any policyholder who purchased a single adult SLCSP in Albany who received an APTC of \$419.68 ( $\$564.85 - \$145.17$ ) per month or more, would fall into the 200-250% FPL band.
- **Example 2:**
  - For a policyholder purchasing a family policy in Albany, where the family is composed of 2 adults and 4 children (6 persons being insured):
    - The SLCSP in Albany in 2022 for a family policy was 1,609.82 ( $\$564.85 * 2.85$ )
    - Assume no additional family member per the assumptions above (6 in total)
    - Using the table above, the applicable 2021 Family income is \$88,950
    - $\$88,950 / 12 = \$7,412.50$
    - The maximum amount this policyholder would have paid (after consideration of APTC) in 2022 is \$296.50 (4.0% of \$7,412.50) per month
    - Using these assumptions, any policyholder who purchased a family policy in Albany, with 6 family members in total, who received an APTC of \$1,313.32 ( $\$1,609.82 - \$296.50$ ) per month or more, would fall into the 200-250% FPL band. In addition to the policyholder, any other individuals insured under this policy would also fall in to the 200-250% FPL band.

We expect that the use of these assumptions by all insurers will result in a fairly accurate estimate of the impact. We are also interested in any estimates that you may have prepared using a methodology that differs from the one prescribed above. Once we have received all of the data, we will provide information back to the plans. Insurers should then use that information to develop their own factors for purposes of completing Line 23c of Exhibit 18 for the rate filing that is due on May 10<sup>th</sup>, 2023.

**Summary of Responses**

Attention Health Plan Actuaries:

The attached file, “1332 Waiver Response Summary – 4-28-2023.xlsx” includes a summary of the data that was collected for purposes of estimating the impact of New York’s 1332 Waiver, to expand the Essential Plan up to 250% FPL, on 2024 Individual premium rates. This information shows what the impact would have been with respect to calendar year 2022, and should be used to develop your own estimate of the impact on 2024 rates should the Waiver be approved by CMS.

Any impact associated with this item that is included in the 2024 Individual rate application should be expressed as a factor on Line 23c of Exhibit 18 and accompanied by appropriate justification in the Actuarial Memorandum.

**Attachment: [1332 Waiver Responses Summary – 4-28-2023.xlsx]:**

| <b>Federal Poverty Level (FPL) Band</b> | <b>Metal Level</b> | <b>Member Months</b> | <b>Earned Premiums</b> | <b>Allowed Claims</b> | <b>Paid Claims</b> | <b>Incurred Claims (2022 Claims Paid with run-out through February 2023 including IBNR)</b> |
|---|--------------------|----------------------|------------------------|-----------------------|--------------------|---|
| 200-250% of FPL                         | Platinum           | 10,783               | 10,049,821             | 17,429,475            | 16,169,433         | 16,974,845  |
| 200-250% of FPL                         | Gold               | 26,030               | 20,158,971             | 26,971,000            | 23,859,178         | 24,664,931  |
| 200-250% of FPL                         | Silver             | 41,280               | 25,534,396             | 29,075,371            | 23,760,448         | 25,050,459  |
| 200-250% of FPL                         | Silver 73%         | 226,823              | 138,582,503            | 128,748,935           | 105,069,424        | 108,712,891   |
| 200-250% of FPL                         | Bronze             | 119,983              | 58,833,932             | 39,228,683            | 27,021,429         | 28,690,439  |
| 200-250% of FPL                         | Catastrophic       | -                    | -                      | -                     | -                  | -   |
| <b>200-250% of FPL</b>                  | <b>All Metals</b>  | <b>424,899</b>       | <b>253,159,623</b>     | <b>241,453,465</b>    | <b>195,879,911</b> | <b>204,093,566</b>  |

| <b>FPL Band</b>                 | <b>Metal Level</b> | <b>Member Months</b> | <b>Earned Premiums</b> | <b>Allowed Claims</b> | <b>Paid Claims</b>   | <b>Incurred Claims (2022 Claims Paid with run-out through February 2023 including IBNR)</b> |
|---------------------------------|--------------------|----------------------|------------------------|-----------------------|----------------------|---|
| Greater than 250% of FPL        | Platinum           | 290,518              | 269,756,264            | 541,494,188           | 511,190,884          | 530,450,364   |
| Greater than 250% of FPL        | Gold               | 395,235              | 306,917,114            | 378,803,371           | 332,063,005          | 345,869,462   |
| Greater than 250% of FPL        | Silver             | 929,848              | 585,546,193            | 604,770,307           | 490,168,273          | 510,462,546   |
| Greater than 250% FPL           | Silver 73%         | -                    | -                      | -                     | -                    | -   |
| Greater than 250% of FPL        | Bronze             | 991,074              | 449,822,556            | 348,422,157           | 245,197,058          | 256,831,627   |
| Greater than 250% of FPL        | Catastrophic       | 55,035               | 11,412,590             | 10,059,587            | 6,116,774            | 6,766,018   |
| <b>Greater than 250% of FPL</b> | <b>All Metals</b>  | <b>2,661,710</b>     | <b>1,623,454,716</b>   | <b>1,883,549,611</b>  | <b>1,584,735,994</b> | <b>1,650,380,016</b>  |

| <b>FPL Band</b>                | <b>Metal Level</b> | <b>Member Months</b> | <b>Earned Premiums</b> | <b>Allowed Claims</b> | <b>Paid Claims</b>   | <b>Incurred Claims (2022 Claims Paid with run-out through February 2023 including IBNR)</b> |
|--------------------------------|--------------------|----------------------|------------------------|-----------------------|----------------------|---|
| Total Individual Market        | Platinum           | 301,301              | 279,806,085            | 558,923,663           | 527,360,317          | 547,425,209   |
| Total Individual Market        | Gold               | 421,265              | 327,076,084            | 405,774,371           | 355,922,183          | 370,534,393   |
| Total Individual Market        | Silver             | 971,128              | 611,080,589            | 633,845,678           | 513,928,720          | 535,513,005   |
| Total Individual Market        | Silver 73%         | 226,823              | 138,582,503            | 128,748,935           | 105,069,424          | 108,712,891   |
| Total Individual Market        | Bronze             | 1,111,057            | 508,656,488            | 387,650,841           | 272,218,487          | 285,522,066   |
| Total Individual Market        | Catastrophic       | 55,035               | 11,412,590             | 10,059,587            | 6,116,774            | 6,766,018   |
| <b>Total Individual Market</b> | <b>All Metals</b>  | <b>3,086,609</b>     | <b>1,876,614,339</b>   | <b>2,125,003,075</b>  | <b>1,780,615,905</b> | <b>1,854,473,582</b>  |

|  | <b>Change in Member Months</b> | <b>Change in Earned Premiums</b> | <b>Change in Allowed Claims</b> | <b>Change in Paid Claims</b> | <b>Change in Incurred Claims</b> |
|--|--------------------------------|----------------------------------|---------------------------------|------------------------------|----------------------------------|
| <b>Estimated Impact of Removing the 200-250% FPL Population:</b> | <b>-13.8%</b>                  | <b>-13.5%</b>                    | <b>-11.4%</b>                   | <b>-11.0%</b>                | <b>-11.0%</b>                    |

| <b>FPL Band</b>        | <b>Metal Level</b> | <b>Paid/Allowed Ratio</b> | <b>PMPM Earned Premium</b> | <b>PMPM Allowed</b> | <b>PMPM Paid</b> | <b>PMPM Incurred</b> |
|------------------------|--------------------|---------------------------|----------------------------|---------------------|------------------|----------------------|
| 200-250% of FPL        | Platinum           | 97.4%                     | 932.01                     | 1,616.38            | 1,499.53         | 1,574.22             |
| 200-250% of FPL        | Gold               | 91.4%                     | 774.45                     | 1,036.15            | 916.60           | 947.56               |
| 200-250% of FPL        | Silver             | 86.2%                     | 618.57                     | 704.35              | 575.59           | 606.84               |
| 200-250% of FPL        | Silver 73%         | 84.4%                     | 610.97                     | 567.62              | 463.22           | 479.29               |
| 200-250% of FPL        | Bronze             | 73.1%                     | 490.35                     | 326.95              | 225.21           | 239.12               |
| 200-250% of FPL        | Catastrophic       |                           |                            |                     |                  |                      |
| <b>200-250% of FPL</b> | <b>All Metals</b>  | <b>84.5%</b>              | <b>595.81</b>              | <b>568.26</b>       | <b>461.00</b>    | <b>480.33</b>        |

| <b>FPL Band</b>                 | <b>Metal Level</b> | <b>Paid/Allowed Ratio</b> | <b>PMPM Earned Premium</b> | <b>PMPM Allowed</b> | <b>PMPM Paid</b> | <b>PMPM Incurred</b> |
|---------------------------------|--------------------|---------------------------|----------------------------|---------------------|------------------|----------------------|
| Greater than 250% of FPL        | Platinum           | 98.0%                     | 928.54                     | 1,863.89            | 1,759.58         | 1,825.88             |
| Greater than 250% of FPL        | Gold               | 91.3%                     | 776.54                     | 958.43              | 840.17           | 875.10               |
| Greater than 250% of FPL        | Silver             | 84.4%                     | 629.72                     | 650.40              | 527.15           | 548.97               |
| Greater than 250% of FPL        | Silver 73%         |                           |                            |                     |                  |                      |
| Greater than 250% of FPL        | Bronze             | 73.7%                     | 453.87                     | 351.56              | 247.41           | 259.14               |
| Greater than 250% of FPL        | Catastrophic       | 67.3%                     | 207.37                     | 182.79              | 111.14           | 122.94               |
| <b>Greater than 250% of FPL</b> | <b>All Metals</b>  | <b>87.6%</b>              | <b>609.93</b>              | <b>707.65</b>       | <b>595.38</b>    | <b>620.05</b>        |

| <b>FPL Band</b>                | <b>Metal Level</b> | <b>Paid/ Allowed Ratio</b> | <b>PMPM Earned Premium</b> | <b>PMPM Allowed</b> | <b>PMPM Paid</b> | <b>PMPM Incurred</b> |
|--------------------------------|--------------------|----------------------------|----------------------------|---------------------|------------------|----------------------|
| Total Individual Market        | Platinum           | 97.9%                      | 928.66                     | 1,855.03            | 1,750.28         | 1,816.87             |
| Total Individual Market        | Gold               | 91.3%                      | 776.41                     | 963.23              | 844.89           | 879.58               |
| Total Individual Market        | Silver             | 84.5%                      | 629.25                     | 652.69              | 529.21           | 551.43               |
| Total Individual Market        | Silver 73%         | 84.4%                      | 610.97                     | 567.62              | 463.22           | 479.29               |
| Total Individual Market        | Bronze             | 73.7%                      | 457.81                     | 348.90              | 245.01           | 256.98               |
| Total Individual Market        | Catastrophic       | 67.3%                      | 207.37                     | 182.79              | 111.14           | 122.94               |
| <b>Total Individual Market</b> | <b>All Metals</b>  | <b>87.3%</b>               | <b>607.99</b>              | <b>688.46</b>       | <b>576.88</b>    | <b>600.81</b>        |

|                                      |                                      |                               |                            |                                |
|--------------------------------------|--------------------------------------|-------------------------------|----------------------------|--------------------------------|
| <b>Change in Paid/ Allowed Ratio</b> | <b>Change in PMPM Earned Premium</b> | <b>Change in PMPM Allowed</b> | <b>Change in PMPM Paid</b> | <b>Change in PMPM Incurred</b> |
| <b>0.4%</b>                          | <b>0.3%</b>                          | <b>2.8%</b>                   | <b>3.2%</b>                | <b>3.2%</b>                    |

|  |               |
|--|---------------|
| 2022 Statewide Loss Ratio Without Waiver   | 98.8%         |
| 2022 Statewide Loss Ratio With Waiver      | <u>101.7%</u> |
| <b>Change in 2022 Statewide Loss Ratio</b> | <b>2.9%</b>   |



## 1332 Waiver Actuarial & Economic Analysis Updates

### Overview

Since the submission of New York’s 1332 Waiver Application on May 12, 2023, the State has made three policy changes to its proposed expansion for the Essential Plan (EP) under the waiver:

1. Addition of the Insurer Reimbursement Implementation Plan (IRIP).
2. Modification of the start date from January 1, 2024 to April 1, 2024.
3. Elimination of the \$15 monthly member premium for consumers between 200 – 250% of FPL in the Essential Plan.

The five- and ten-year estimates in the 1332 Waiver Actuarial and Economic Analysis have been updated to reflect these policy changes. Where applicable, the analysis also includes updated data and assumptions that have changed since the initial waiver submission. Unless otherwise noted, the Appendix Tables in this addendum use the same data, methodology, and assumptions as outlined in the Actuarial and Economic Analysis submitted on May 12, 2023.

### Data Sources and Reliance

In addition to the data sources outlined in Section 3 of the May 12, 2023 Actuarial and Economic Analysis, the following data was collected for this updated analysis:

- Updated estimated monthly enrollment for 2024-2033 from the Urban Institute Health Policy Simulation Model (HIPSM) for the current EP population based on actual recent enrollment, the 200 - 250% of FPL EP expansion population, and for the pregnancy provision population.
- Summary of the number of uninsured individuals in New York in with and without waiver by race/ethnicity and FPL from the Urban Institute HIPSM model.
- EP estimated enrollment by county and FPL for Q4 2023, provided by New York State of Health (NYSoH).
- Actual distribution of enrollment by EP cohort, provided by NYSoH.
- Approved 2024 Essential Plan (EP) premium rates (capitation rates) and non-claim/administrative amounts from NYSoH.
- 2024 Second Lowest Cost Silver Premiums (SLCSP) from NYSoH.
- QHP enrollment by county and plan as of September 30, 2023 from NYSoH.
- Approved 2024 aggregate premium increases for the QHP market (including and excluding the 200 – 250% of FPL population) from the New York Department of Financial Services (DFS).

- Summary of data collected by DFS from health plan actuaries to estimate the impact of the 1332 waiver on the QHP market.
- Premium growth assumptions for private health insurance from the Centers for Medicare & Medicaid Services (CMS) Office of the Actuary (OACT) published on June 24, 2023.<sup>1</sup>
- Letter from the CMS OACT to the State of New York, dated September 5, 2023, subject “Federal Basic Health Program Payment to New York for October - December (Q4) 2023 and Reconciled Payment Adjustments for October – December 2020 (Q4 2020), January – March 2021 (Q1 2021) and April - June (Q2) 2021”
- CMCS Informational Bulletin for the BHP Federal Funding Methodology for Program Year 2024, dated September 15, 2023<sup>2</sup>

The data received from DFS, NYSoH, and the Urban Institute were reviewed for reasonableness and consistency during the work; however, it was not audited by the team conducting the actuarial and economic analysis. Enrollment data for NYSoH is audited and validated with CMS and insurers. Urban Institute likewise has validation mechanisms for its economic microsimulation model.

All data was reviewed for appropriateness, sufficiency, and a reasonable effort was made to identify data values that were questionable or relationships that were significantly inconsistent. The actuarial guidelines related to reliance on models developed by others as outlined in Actuarial Standard of Practice No. 56 were followed. It was assumed that all data and information provided was accurate and complete; if it was not, the results of the analysis may likewise be inaccurate or incomplete.

The scope of the actuarial certification and the intended use of the analysis being performed to determine the nature of the data needed was considered. Additionally, the actuarial guidelines on utilizing imperfect data and considering the quality of data in the actuarial analysis as outlined in Actuarial Standard of Practice No. 23 were followed. The team relied on the State of New York enrollment and premium data highlighted. Based on reasonableness checks, the team believes it is a credible and reasonable data source to assess the impact of the Waiver on the State of New York’s individual market population.

## Methodology and Assumptions

The following adjustments were made to the original methodology and assumptions in the 1332 Waiver Actuarial and Economic Analysis.

### ***Current EP (BHP) Population Enrollment (< 200% of FPL)***

Two updates were made to the estimated enrollment of the current EP population (those < 200% of FPL) in both the with and without waiver scenarios. 1) The total projected enrollment in the EP for current members was updated based on actuals, and 2) The distribution of enrollment

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<sup>1</sup> <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.2023.00403>

<sup>2</sup> <https://www.medicaid.gov/sites/default/files/2023-09/cib091523.pdf>



between the four current EP cohorts (EP1 - EP4)<sup>3</sup> was also updated based on actuals. These estimates were provided by Urban Institute based on the experience of the State since the COVID-19 Public Health Emergency (PHE) ended.

The table below provides a summary of the EP rate cohorts and cost sharing.

| Rate Cohorts | Population   | Income         | Ages  | Premium | Deductible | Cost Sharing | Max Out-Of-Pocket |
|--------------|--------------|----------------|-------|---------|------------|--------------|-------------------|
| EP 200-250%  | Non-Medicaid | 200 – 250% FPL | 19-64 | \$0     | \$0        | Yes          | \$2,000           |
| EP 1         | Non-Medicaid | 150 – 200% FPL | 19-64 | \$0     | \$0        | Yes          | \$360             |
| EP 2         | Non-Medicaid | 138 – 150% FPL | 19-64 | \$0     | \$0        | RX only      | \$200             |
| EP 3         | Aliessa      | 100 – 138% FPL | 19-64 | \$0     | \$0        | RX only      | \$200             |
| EP 4         | Aliessa      | < 100% FPL     | 19-64 | \$0     | \$0        | No           | \$0               |

The total estimated enrollment for the current EP population accounts for the emerging experience throughout 2023 that reflects the impact of several state policy changes, including the implementation of a 50% reasonable income compatibility threshold, the experience of transitions between EP and other programs during the PHE unwinding, the State’s ex parte system and mitigation strategy, and the impact of Section e14 waivers.

The distribution of total enrollment for the current BHP population was also updated to reflect the latest administrative data. Compared to the waiver application submitted in May 2023, this change decreased the relative percentage of the total population in the EP1 cohort and increased the percentage in the EP2, EP3, and EP4 cohorts.

**200-250% FPL Population Enrollment**

Two updates were made to the estimated enrollment of the 200 - 250% of FPL population due to 1) removing the \$15 member monthly premium and 2) modifying the waiver implementation start date to April 1, 2024.

With the elimination of the \$15 member premium for the EP 200 - 250% of FPL expansion population, enrollment is estimated to increase by 3% from the initial waiver application. This estimate, developed by Urban Institute, is based on an analysis of historical EP enrollment and the difference in average month-over-month enrollment growth for consumers 150 – 200% of FPL in EP1 before and after the reduction of a monthly premium from \$20 to \$0 in June 2021.

Enrollment ramp up was adjusted to account for the impact of the April 1, 2024 implementation date. It is assumed all consumers enrolled in QHPs on-exchange between 200 – 250% of FPL will be automatically moved into the EP on April 1, 2024. There will be a slower ramp up of the

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<sup>3</sup> EP cohort eligibility by FPL are as follows: EP1 151%-200%, EP2 139%-150%, EP3 100%-138%, and EP4 <100%. With the removal of the \$15 member premium for the EP5 expansion population (200%-250% of FPL), no EP cohorts have a premium cost. EP Benefits and Cost Sharing is available at: [https://info.nystateofhealth.ny.gov/sites/default/files/Attachment%20G%20-%20EP%20Benefits%20and%20Cost-Sharing\\_Revised%206%2020%202023.pdf](https://info.nystateofhealth.ny.gov/sites/default/files/Attachment%20G%20-%20EP%20Benefits%20and%20Cost-Sharing_Revised%206%2020%202023.pdf)

off-exchange and uninsured population compared to the initial waiver due to the implementation no longer aligning with Open Enrollment. Urban Institute estimated that With Waiver enrollment would ramp up from original QHP Without Waiver levels (approximately 69,010) in January through March of 2024 to the final projected With Waiver level of 91,928 in July through December of 2024. The additional enrollment (22,918 members) was assumed to ramp-up 50% in April, 75% in May, and 90% in June, as outlined below. The take-up rates shown below reflect the percentage of additional enrollees (those not currently enrolled in QHPs) that are assumed to enroll in the EP for each month.

| 2024 Monthly Projected Enrollment for 200-250% FPL Population |           |        |        |        |           |                     |                    |                |
|---|-----------|--------|--------|--------|-----------|---------------------|--------------------|----------------|
|   | Jan - Mar | Apr    | May    | Jun    | Jul - Dec | Avg. First 3 Months | Avg. Last 9 Months | Avg. 12 Months |
| <b>200%-250% FPL in QHP</b>                                   | 69,010    | 410    | 410    | 410    | 410       | 69,010              | 410                | 17,560         |
| <b>200%-250% FPL in EP</b>                                    | -         | 80,469 | 86,198 | 89,636 | 91,928    | -                   | <b>89,763</b>      | 67,322         |
| EP Take-Up Rate   |           | 50.0%  | 75.0%  | 90.0%  | 100.0%    |                     |                    |                |

Note that an estimated 410 individuals enrolling in QHPs with incomes of 200-250% are *not* eligible for EP expansion due to age.

The tables below reflect the additional cost of the 1332 Waiver to the State with the removal of the \$15 monthly member premium which have been incorporated into the updated PMPM Essential Plan premium rates (state capitation rates) for the 200 – 250% of FPL cohort. The estimates for 2024 reflect costs of removing the \$15 monthly premium for 9 months.

Scenario A: Current Law & Insurer Reimbursement

| With Waiver - Scenario A                    | 2024   | 2025    | 2026   | 2027   | 2028   | 5-Year Total |
|---|--------|---------|--------|--------|--------|--------------|
| EP 200-250% Enrollment                      | 67,322 | 102,973 | 95,995 | 96,319 | 96,645 | 91,851       |
| \$15 Member Premium Removal Cost (millions) | \$12   | \$19    | \$17   | \$17   | \$17   | \$83         |

Scenario B: IRA Subsidies Are Extended & Insurer Reimbursement

| With Waiver - Scenario B                    | 2024   | 2025    | 2026   | 2027   | 2028   | 5-Year Total |
|---|--------|---------|--------|--------|--------|--------------|
| EP 200-250% Enrollment                      | 67,322 | 102,973 | 95,995 | 96,319 | 96,645 | 91,851       |
| \$15 Member Premium Removal Cost (millions) | \$12   | \$19    | \$17   | \$17   | \$17   | \$83         |

Scenario C: Pregnancy Choice, Current Law & Insurer Reimbursement

| With Waiver - Scenario C                    | 2024   | 2025    | 2026   | 2027   | 2028   | 5-Year Total |
|---|--------|---------|--------|--------|--------|--------------|
| EP 200-250% Enrollment                      | 67,454 | 103,683 | 96,779 | 97,110 | 97,441 | 92,494       |
| \$15 Member Premium Removal Cost (millions) | \$12   | \$19    | \$17   | \$17   | \$18   | \$83         |

**Impact on Uninsured**

The 1332 Waiver is expected to increase health equity and expand access to currently uninsured individuals in New York. The waiver targets the income group with the highest uninsured rate. The following data from Urban Institute highlights the estimated yearly impact of the waiver on the uninsured by FPL and race/ethnicity. The first table demonstrates the impact on the uninsured with the enhanced APTCs under the Inflation Reduction Act (IRA) in 2026 when enrollment is expected to reach a steady state during the waiver. In comparison, the second table demonstrates the impact in 2026 if the enhanced subsidies no longer continue.

**Impact on Uninsured, 2026 with Continuation of Enhanced PTCs Under the IRA**

| Characteristics               | Uninsured Without Waiver |               |                | Uninsured With Waiver |               |                |
|-------------------------------|--------------------------|---------------|----------------|-----------------------|---------------|----------------|
|                               | Number of Uninsured      | % of Total    | Uninsured Rate | Number of Uninsured   | % of Total    | Uninsured Rate |
| <b>Race &amp; Ethnicity</b>   |                          |               |                |                       |               |                |
| White, non-Hispanic           | 257                      | 27.9%         | 3.1%           | 248                   | 27.5%         | 3.0%           |
| Hispanic                      | 401                      | 43.6%         | 11.8%          | 397                   | 44.0%         | 11.7%          |
| Black, non-Hispanic           | 117                      | 12.7%         | 4.8%           | 114                   | 12.7%         | 4.7%           |
| Asian & Pacific Islander      | 113                      | 12.3%         | 6.8%           | 111                   | 12.3%         | 6.7%           |
| American Indian/Alaska Native | 12                       | 1.3%          | 6.5%           | 12                    | 1.3%          | 6.4%           |
| Other                         | 20                       | 2.2%          | 4.9%           | 20                    | 2.2%          | 4.8%           |
| <b>Income</b>                 |                          |               |                |                       |               |                |
| Below 138% FPL                | 418                      | 45.4%         | 6.3%           | 416                   | 46.1%         | 6.2%           |
| Between 138% FPL and 200% FPL | 81                       | 8.8%          | 6.2%           | 81                    | 9.0%          | 6.2%           |
| Between 200% FPL and 400% FPL | 313                      | 34.0%         | 9.2%           | 296                   | 32.8%         | 8.7%           |
| Above 400% FPL                | 109                      | 11.8%         | 2.2%           | 109                   | 12.0%         | 2.2%           |
| <b>Total</b>                  | <b>921</b>               | <b>100.0%</b> | <b>5.6%</b>    | <b>902</b>            | <b>100.0%</b> | <b>5.5%</b>    |

**Impact on Uninsured, 2026 with Standard PTCs (Current Law)**

| Characteristics               | Uninsured Without Waiver |               |                | Uninsured With Waiver |               |                |
|-------------------------------|--------------------------|---------------|----------------|-----------------------|---------------|----------------|
|                               | Number of Uninsured      | % of Total    | Uninsured Rate | Number of Uninsured   | % of Total    | Uninsured Rate |
| <b>Race &amp; Ethnicity</b>   |                          |               |                |                       |               |                |
| White, non-Hispanic           | 263                      | 28.2%         | 3.2%           | 254                   | 27.8%         | 3.1%           |
| Hispanic                      | 403                      | 43.3%         | 11.8%          | 399                   | 43.7%         | 11.7%          |
| Black, non-Hispanic           | 118                      | 12.7%         | 4.9%           | 116                   | 12.7%         | 4.8%           |
| Asian & Pacific Islander      | 114                      | 12.2%         | 6.9%           | 112                   | 12.2%         | 6.7%           |
| American Indian/Alaska Native | 12                       | 1.3%          | 6.5%           | 12                    | 1.3%          | 6.4%           |
| Other                         | 21                       | 2.2%          | 4.9%           | 20                    | 2.2%          | 4.9%           |
| <b>Income</b>                 |                          |               |                |                       |               |                |
| Below 138% FPL                | 418                      | 44.9%         | 6.3%           | 416                   | 45.6%         | 6.2%           |
| Between 138% FPL and 200% FPL | 81                       | 8.7%          | 6.2%           | 81                    | 8.9%          | 6.2%           |
| Between 200% FPL and 400% FPL | 321                      | 34.4%         | 9.4%           | 304                   | 33.3%         | 8.9%           |
| Above 400% FPL                | 111                      | 11.9%         | 2.2%           | 111                   | 12.2%         | 2.2%           |
| <b>Total</b>                  | <b>931</b>               | <b>100.0%</b> | <b>5.7%</b>    | <b>913</b>            | <b>100.0%</b> | <b>5.6%</b>    |

**BHP Funding**

The baseline without waiver BHP funding was updated to reflect the latest funding as reported by NYSoH and CMS for Q4 2023. This amount was further adjusted in the with and without waiver scenarios to account for the change in Income Reconciliation Factor (IRF) for 2024, which is 96.05%. The initial waiver application assumed an IRF of 100.66% from 2023 onwards. Because Q4 2023 BHP funding is reported in aggregate, the PMPM funding amount by EP cohort was estimated by applying the relative distributions of enrollment across EP 1- 4 cohorts from historical data.

Additionally, for Scenarios A and C which reflect the current law whereas the enhanced APTCs under the IRA expires at the end of 2025, the BHP funding amounts for 2026 and beyond were updated to assume a 98.37% IRF. This aligns with the IRF from the 2019 BHP funding methodology, which is the most recent year available before the COVID-19 PHE and enhanced APTCs began.

### ***Enrollment and Projected Savings for the Essential Plan Pregnancy Choice Provision (Scenario C)***

Three updates were made to Scenario C for estimating enrollment and federal savings for the pregnancy choice provision. These include: 1) updating Medicaid postpartum care from 60 to 365 days based on New York’s CMS-approved policy change in 2023, 2) applying updated Medicaid rates, and 3) modifying estimated enrollment based on the latest administrative data and a waiver implementation start date of April 1, 2024.

On June 14, 2023, New York announced the extension of Medicaid postpartum health coverage from 60 days to 365 days following pregnancy. This program change has been incorporated into the estimated enrollment, ramp-up, and Medicaid savings for pregnant women who remain within the EP under the 1332 Waiver instead of transitioning into Medicaid.

The cost estimates for Medicaid spend for pregnancy, delivery, and post-partum care of EP members who would otherwise move to Medicaid is based on an analysis of the Per Member Per Month (PMPM) Medicaid capitation rates of this population. The analysis assumes all Medicaid members, both Fee For Service (FFS) and Medicaid Managed Care (MMC), would be moved into the MMC Temporary Assistance for Needy Families (TANF) Adult rate cohort and that all members would have maternity and delivery rates similar to the supplemental maternity “kick” payment in the MMC program. The monthly Medicaid capitation rate for individuals who are pregnant is the MMC TANF rate. Therefore, the State Fiscal Year (SFY) 2023-2024 Medicaid capitation rates for TANF Adult and the supplemental maternity kick payment were used to estimate Federal cost savings for this population. Additionally, since prescription drugs were carved out of the SFY 2023-2024 TANF Adult rates, the SFY 2022-2023 pharmacy component of the TANF Adult rate was trended forward at 5% and added to the SFY 2023-2024 TANF Adult rate. Both rates (the TANF adult and supplemental maternity kick payment) were trended at a rate of 5% per year. Based on historical data and guidance from DOH, the estimates assume EP members who report being pregnant and are eligible for Medicaid would spend on average 16.5 months in Medicaid (an average of 4.5 months from when a member reports being pregnant to when the birth occurs with 12 months of postpartum coverage). Additionally, the analysis assumes an average of 50% Federal Medical Assistance Percentage (FMAP) for the non-5-year bar population - (those 138% - 223% of FPL) and a 0% Federal share of Medicaid costs for the 5-year bar population (those below 138% of FPL, known as the Aliessa population in New York).

The table below provides the ten-year estimates for total Pregnancy Medicaid enrollment and state and federal spend with and without the waiver. The population displayed in the table are based on the number of estimated MMC maternity kick payments for SFY 2023-2024 as provided by New York’s Medicaid actuarial team. There are approximately 102,000 projected MMC maternity kick payments for SFY 2023 - 2024, which was adjusted to reflect the anticipated member months per delivery consistent with average of 4.5 months of pregnancy Medicaid prior to delivery and 12 months of post-partum Medicaid. Enrollment was adjusted to reflect a calendar year basis for the waiver and trended at a rate of approximately 2% per year, which is consistent with the assumed enrollment growth of the population that is assumed to stay

in EP rather than moving to Medicaid when they report becoming pregnant. The estimated volume of EP members that report a pregnancy and would otherwise transition to pregnancy Medicaid without the waiver is based on historical NYSOH administrative data. Under the pregnancy choice provision, EP consumers that report being pregnant will default to staying within the EP and will need to opt to transition to pregnancy Medicaid instead. It was assumed that everyone in the EP who reports being pregnant will choose to stay in the EP in order to model the maximum impact of the pregnancy choice provision.<sup>4</sup> Since there is parity in coverage and benefits between the EP and pregnancy Medicaid, and because the EP has made investments to increase provider payments which will continue to have positive impacts on EP provider networks, it is anticipated that most consumers will remain in the EP. There is a 17 month ramp up assumption for program adoption. The analysis also reflects the mix of the 5-year bar population (which receives a 0% Federal match on Medicaid payments) and the non-5-year bar population (which receives a 50% Federal match on Medicaid payments). According to the data provided by New York’s Medicaid actuaries, approximately 99% of maternity kick payments in MMC are in the non-5-year bar population.

| Pregnancy Medicaid Estimates With and Without the Waiver |         |          |          |          |          |          |          |          |          |          |
|--|---------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Scenario C   | 2024    | 2025     | 2026     | 2027     | 2028     | 2029     | 2030     | 2031     | 2032     | 2033     |
| <b>Without Waiver</b>                                    |         |          |          |          |          |          |          |          |          |          |
| Pregnancy Medicaid Total Enrollment                      | 146,091 | 149,012  | 151,993  | 155,032  | 158,133  | 161,296  | 164,522  | 167,812  | 171,168  | 174,592  |
| Enrollment >138% FPL                                     | 144,535 | 147,426  | 150,374  | 153,382  | 156,449  | 159,578  | 162,770  | 166,025  | 169,346  | 172,733  |
| Federal Spend (millions)                                 | \$1,015 | \$1,084  | \$1,161  | \$1,244  | \$1,332  | \$1,426  | \$1,528  | \$1,636  | \$1,752  | \$1,835  |
| <b>With Waiver</b>                                       |         |          |          |          |          |          |          |          |          |          |
| Pregnancy Medicaid Total Enrollment                      | 141,973 | 136,915  | 137,748  | 140,503  | 143,313  | 146,179  | 149,102  | 152,085  | 155,126  | 158,229  |
| Enrollment >138% FPL                                     | 141,539 | 136,472  | 137,296  | 140,042  | 142,843  | 145,700  | 148,614  | 151,586  | 154,618  | 157,710  |
| Federal Spend (millions)                                 | \$990   | \$996    | \$1,060  | \$1,136  | \$1,217  | \$1,303  | \$1,395  | \$1,494  | \$1,601  | \$1,673  |
| <b>Difference</b>  |         |          |          |          |          |          |          |          |          |          |
| Pregnancy Medicaid Total Enrollment                      | (4,118) | (12,098) | (14,245) | (14,530) | (14,820) | (15,117) | (15,419) | (15,728) | (16,042) | (16,363) |
| Enrollment >138% FPL                                     | (2,996) | (10,954) | (13,078) | (13,339) | (13,606) | (13,878) | (14,156) | (14,439) | (14,728) | (15,022) |
| Federal Spend (millions)                                 | (\$25)  | (\$89)   | (\$101)  | (\$108)  | (\$115)  | (\$124)  | (\$133)  | (\$142)  | (\$152)  | (\$161)  |

**Note:** 2024 without waiver Pregnancy Medicaid enrollment reflects the average monthly enrollment for the 12-month period. 2024 with waiver Pregnancy Medicaid enrollment reflects the average monthly enrollment for the 9-month period starting 4/1/2024.

The impact of the pregnancy choice provision on EP enrollment and cost savings to the federal government is included within Table C4 in the Appendix.

The initial estimated enrollment for the number of EP pregnant individuals expected to remain in the EP under the waiver was based on historical administrative data, trended with EP enrollment growth. Estimates for the ramp-up in the first year were provided by Urban Institute. To account for the waiver implementation date of April 1, 2024 and the 12 months of postpartum Medicaid coverage, the initial monthly enrollment estimates provided by Urban Institute were adjusted to reflect a seventeen-month enrollment ramp-up until reaching a steady state. The adjustment simulates the progression of new program adoption and member turnover.

<sup>4</sup> Under the BHP, individuals are automatically moved to Medicaid from the Essential Plan when they report being pregnant. They are provided the option to call NYSOH to be moved back into the Essential Plan. The historical volume of individuals who choose to opt into moving has been very low. Given coverage and benefits are equivalent, we do not expect many individuals to opt to move from the Essential Plan to Medicaid under the 1332 Waiver.

### ***Insurer Reimbursement Implementation Plan (IRIP)***

The State has decided to use some of the surplus passthrough funding each year to provide a reimbursement to insurers in lieu of approving the higher, with waiver individual market premium rates. Under IRIP, DFS approves the individual market premiums which assume the 200 – 250% of FPL population remains in the market. Therefore, there is no difference in affordability for consumers that remain in the individual market under the waiver.

As a result, the following changes were made to the assumptions used in the initial waiver application:

1. The assumed 2.2% increase to individual market premiums for subsidy-ineligible On-Exchange consumers and Off-Exchange consumers was removed; this amount was included in the initial analysis to reflect the estimated impact of the migration of the 200 – 250% of FPL population to the EP.
2. The associated price elasticity adjustment that reduced subsidy-ineligible On-Exchange consumers and Off-Exchange enrollment by approximately 2.6% was removed; this amount was previously included to account for the number of consumers who were estimated to choose different health coverage in response to the assumed 2.2% premium increase.

In addition, an investment line item was added to account for the State’s IRIP payments to carriers. The estimated state payment amount for IRIP was calculated to reflect the difference between the aggregate rate increase based on carrier submissions for two scenarios: (i) the 200 – 250% of FPL population would move out of the individual market, and (ii) that the 200 – 250% of FPL population would remain in the market. The difference in the premiums for these scenarios was approximately 2.7%. These IRIP payments are shown in the Appendix. The amount for CY2024 was further adjusted to reflect 9 months of waiver implementation rather than 12 with the April 1, 2024 start.

### ***Loss Ratios and Actuarial Values***

Several updates were made to the loss ratios and actuarial values for each QHP metal level and EP cohort for purposes of estimating out-of-pocket expenses. 2024 QHP loss ratios were updated by using the summary of data collected by DFS to estimate the impact of the 1332 Waiver on the QHP market. The loss ratios assume that the 200 – 250% of FPL would continue to be enrolled in the QHP market, consistent with IRIP. 2024 EP loss ratios were also updated to reflect administrative cost loads (~10.9% for EP1) that are reflected in the approved 2024 EP rates. Finally, 2024 EP actuarial values were updated to account for the most recent benefit designs which reflect reduced cost sharing for EP members relative to prior benefits. The updates to the EP actuarial values effectively reduce expected out-of-pocket expenditures for EP members relative to prior estimates.

### ***Premium Rates for EP***

Essential Plan 2024 premium rates (state capitation rates) have been updated to reflect the rates that were approved by the EP Board of Trustees in August 2023 and weighted for projected

CY2024 enrollment. In addition, the premium for the 200 – 250% of FPL expansion population has been adjusted to account for the removal of the \$15 monthly member premium.

The Essential Plan Board of Trustees voted on April 21, 2023 to increase provider reimbursement for the EP 3 and EP 4 tiers to be consistent with EP 1 and EP 2. The goal of this adjustment was to bring greater equity across the EP tiers by improving access to providers. The Board voted to increase the provider reimbursements up to a maximum of \$800M per year. These reimbursements were included within the approved EP rates for 2024, which are reflected in the program costs in tables A2/B2/C2 in the appendices.

In the initial waiver application, there were separate investment line items reported for Provider Rate Adjustments (\$800M per year) and Reductions in Member Cost Sharing (\$100M for CY2024 and trended forward to future years). These EP investments were included in the approved EP rates for 2024 for EP 1 – 4; therefore, these separate line items have been removed from the Appendix tables. Because the Provider Rate Adjustment investment is approved at a constant level of \$800M per year, the PMPM amount attributable to this investment item has not been trended forward to future years and has instead been added as a constant PMPM level each year for each EP cohort. To develop the PMPM amounts attributable to the Provider Rate Adjustment in the EP premium rates, the State’s EP rate-setting actuaries used CY2024 rates for inpatient, outpatient, and physician services and multiplied by CY2024 enrollment estimates to summarize total expected expenditures. The State’s actuaries then took each cohort’s PMPM and increased it by a constant percentage, specific to each category of service, to achieve the Provider Rate Adjustment budget provision targets. As the provider rate adjustments become part of the base costs for the program, they will be trended forward each year.

### ***Premium Rates for QHP***

In the initial waiver application, it was assumed that QHP premiums would increase by 6.2% in 2024 because health insurers’ requested premium rate increases and approvals from DFS were not known at the time of the application submission. Based on DFS’ approved 2024 QHP rates, this assumption was adjusted to reflect the approved rate increase of 13.5%. This amount was applied equally across all metal levels and across on- and off-exchange plans.

This analysis also has adjusted the QHP premium trend factor for 2025 and beyond from 4.8% to 5.2%. This is based on updated data for the projected growth in Private Health Insurance spend from the Office of the Actuary (OACT) in the Centers for Medicare & Medicaid Services (CMS) projections of health care spending for 2022-2031 published on June 24, 2023.<sup>5</sup>

### ***Second Lowest Cost Silver Premiums (SLCSP)***

The SLCSPs shown in the Appendix have been updated to reflect actual values for 2024. This was based on the 2024 SLCSPs for individual adults reflected in NYSoH’s system for the 2024 Open Enrollment Period. Estimated enrollment for Q4 of 2023 was used to calculate weighted average SLCSPs by Rating Area for 2024.

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<sup>5</sup> <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.2023.00403>

## 2024 Results in the Appendix Tables

Throughout the Appendix tables, the With Waiver Summary of Enrollment, Premium, and Cost Estimates (Appendix Tables A3, B3, and C3,) display 2024 With Waiver enrollment, premium, and APTC amounts as 12-month averages or totals for based on consumers 200 – 250% of FPL spending the first three months of the year in the individual market. All other Appendix tables display the With Waiver amounts as 9-month averages for 2024, since the first year of the waiver will only contain 9 months.

The following tables depict how the enrollment and premium estimates were calculated for 2024 with the mid-year implementation of the 1332 Waiver, using a weighted average of the first 3 months in the individual market and last 9 months in the Essential Plan. Please note, the aggregated premiums under the Essential Plan reflect the capitation rate paid by the State to insurers.

### Scenario A: Current Law & Insurer Reimbursement

|   | 200-250% FPL   | All Other FPL | 200-250% FPL    | All Other FPL |
|---|----------------|---------------|-----------------|---------------|
| <b>With Waiver - Scenario A</b>         | 1/1/24-3/31/24 |               | 4/1/24-12/31/24 |               |
| <b>Unsubsidized On/Off-Exchange</b>     |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 66,122        | 0               | 66,122        |
| Average Premium PMPM                    | \$0            | \$802         | \$0             | \$802         |
| <b>Subsidized On-Exchange</b>           |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 168,922       | 410             | 168,512       |
| Average Premium PMPM                    | \$756          | \$761         | \$756           | \$761         |
| Average APTC PMPM                       | \$332          | \$314         | \$332           | \$314         |
| <b>Total Individual Market</b>          |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 235,044       | 410             | 234,634       |
| Average Premium PMPM                    | \$756          | \$773         | \$756           | \$773         |
| Aggregate Premiums (millions)           | \$156          | \$545         | \$3             | \$1,632       |
| Projected Federal Spend (millions)      | \$64           | \$149         | \$1             | \$445         |
| <b>Essential Plan</b>                   |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 1,365,381     | 89,763          | 1,365,381     |
| Average Premium PMPM                    | \$0            | \$625         | \$718           | \$625         |
| Aggregate Premiums (millions)           | \$0            | \$2,559       | \$580           | \$7,678       |
| IRIP Payment (millions)                 |                | \$0           |                 | \$45          |
| Quality Incentive Pool Costs (millions) |                | \$56          |                 | \$169         |
| LTSS Coverage (millions)                |                | \$0           |                 | \$0           |
| SDoH/BH Grant Program (millions)        |                | \$6           |                 | \$19          |
| Total Program Costs (millions)          |                | \$2,778       |                 | \$8,334       |
| Projected Federal Spend (millions)      |                | \$802         |                 | \$2,405       |



**Scenario B: IRA Subsidies Are Extended & Insurer Reimbursement**

|   | 200-250% FPL   | All Other FPL | 200-250% FPL    | All Other FPL |
|---|----------------|---------------|-----------------|---------------|
| <b>With Waiver - Scenario B</b>         | 1/1/24-3/31/24 |               | 4/1/24-12/31/24 |               |
| <b>Unsubsidized On/Off-Exchange</b>     |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 66,122        | 0               | 66,122        |
| Average Premium PMPM                    | \$0            | \$802         | \$0             | \$802         |
| <b>Subsidized On-Exchange</b>           |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 168,922       | 410             | 168,512       |
| Average Premium PMPM                    | \$756          | \$761         | \$756           | \$761         |
| Average APTC PMPM                       | \$332          | \$314         | \$332           | \$314         |
| <b>Total Individual Market</b>          |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 235,044       | 410             | 234,634       |
| Average Premium PMPM                    | \$756          | \$773         | \$756           | \$773         |
| Aggregate Premiums (millions)           | \$156          | \$545         | \$3             | \$1,632       |
| Projected Federal Spend (millions)      | \$64           | \$149         | \$1             | \$445         |
| <b>Essential Plan</b>                   |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 1,365,381     | 89,763          | 1,365,381     |
| Average Premium PMPM                    | \$0            | \$625         | \$718           | \$625         |
| Aggregate Premiums (millions)           | \$0            | \$2,559       | \$580           | \$7,678       |
| IRIP Payment (millions)                 | \$0            |               | \$45            |               |
| Quality Incentive Pool Costs (millions) | \$56           |               | \$169           |               |
| LTSS Coverage (millions)                | \$0            |               | \$0             |               |
| SDoH/BH Grant Program (millions)        | \$6            |               | \$19            |               |
| Total Program Costs (millions)          | \$2,778        |               | \$8,334         |               |
| Projected Federal Spend (millions)      | \$802          |               | \$2,405         |               |

**Scenario C: Pregnancy Choice, Current Law & Insurer Reimbursement**

|   | 200-250% FPL   | All Other FPL | 200-250% FPL    | All Other FPL |
|---|----------------|---------------|-----------------|---------------|
| <b>With Waiver - Scenario C</b>         | 1/1/24-3/31/24 |               | 4/1/24-12/31/24 |               |
| <b>Unsubsidized On/Off-Exchange</b>     |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 66,122        | 0               | 66,122        |
| Average Premium PMPM                    | \$0            | \$802         | \$0             | \$802         |
| <b>Subsidized On-Exchange</b>           |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 168,922       | 410             | 168,512       |
| Average Premium PMPM                    | \$756          | \$761         | \$756           | \$761         |
| Average APTC PMPM                       | \$332          | \$314         | \$332           | \$314         |
| <b>Total Individual Market</b>          |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 235,044       | 410             | 234,634       |
| Average Premium PMPM                    | \$756          | \$773         | \$756           | \$773         |
| Aggregate Premiums (millions)           | \$156          | \$545         | \$3             | \$1,632       |
| Projected Federal Spend (millions)      | \$64           | \$149         | \$1             | \$445         |
| <b>Essential Plan</b>                   |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 1,369,339     | 89,922          | 1,369,339     |
| Average Premium PMPM                    | \$0            | \$625         | \$718           | \$625         |
| Aggregate Premiums (millions)           | \$0            | \$2,567       | \$581           | \$7,701       |
| IRIP Payment (millions)                 | \$0            |               | \$45            |               |
| Quality Incentive Pool Costs (millions) | \$56           |               | \$169           |               |
| LTSS Coverage (millions)                | \$0            |               | \$0             |               |
| SDoH/BH Grant Program (millions)        | \$6            |               | \$19            |               |
| Total Program Costs (millions)          | \$2,786        |               | \$8,358         |               |
| Projected Federal Spend (millions)      | \$802          |               | \$2,405         |               |

## Actuarial Certification

Steven N. Wander is a Principal with Deloitte Consulting LLP. He is a Fellow of the Society of Actuaries and a Member of the American Academy of Actuaries. He meets the Academy's qualification standards for rendering the actuarial opinions contained in this analysis.

The State of New York retained Deloitte Consulting to develop this actuarial and economic analysis, a component of the State of New York's 1332 Waiver application.

I certify that the estimates presented in this analysis:

- Address requirements and prohibitions of section 45 CFR 155.1308(f)(iv)(A)-(D)
- Are consistent with the CMS "Checklist for Section 1332 State Relief and Empowerment Waivers Applications" (updated July 2019)
- Have been developed in accordance with applicable Actuarial Standards of Practice (ASOP) requirements, specifically No. 23 (Data Quality), No. 41 (Actuarial Communication), and No. 56 (Modeling)

In this analysis, we relied on enrollment, premium, funding, loss ratio, and trend data provided to Deloitte as outlined in Section 3 of the Actuarial and Economic Analysis submitted on May 12, 2023 and the items outlined in the Data Sources and Reliance section above. All data was reviewed for appropriateness, sufficiency, and a reasonable effort was made to identify data values that were questionable or relationships that were significantly inconsistent; however, we have not audited the data we received. If the underlying data or information provided is inaccurate or incomplete, the results of our review may likewise be inaccurate or incomplete.

Estimates developed by Deloitte are based on an actuarial analysis of future costs and enrollment for PY 2019–2033. It may be expected that actual experience will vary from the values shown in this analysis.

This document is intended solely for the information and use of the State of New York in support of its 1332 Waiver Application and is not for the benefit of or to be relied upon by any other person or entity.



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Steven N. Wander, FSA, MAAA  
Principal, Deloitte Consulting LLP

November 13, 2023

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Date

## Updated Appendix A: Scenario A Detailed 10-Year Estimates (Current Law & Insurer Reimbursement)

The following provides an analysis of the proposed 1332 Waiver under current law for expansion to consumers with incomes between 200–250% of the FPL. The analysis estimates that the proposed Waiver meets each of the four guardrails for the five years of the Waiver and 10-year analysis.

**Table A1. Scenario A High-Level Guardrail Compliance of 1332 Waiver**

| Guardrail          | Estimated Impact With-Waiver (WW) Compared to Without-Waiver (WoW)   |
|--------------------|--|
| Comprehensiveness  | <p>The Waiver is projected to meet the comprehensiveness guardrail as consumers have access to more comprehensive coverage compared to the Baseline Without-Waiver Scenario.</p> <ul style="list-style-type: none"> <li>• Consumers with incomes between 200–250% of the FPL will experience an increase in comprehensiveness.</li> <li>• There are no expected impacts for other consumers in the individual market.</li> <li>• There are no expected impacts for other consumers in the Essential Plan.</li> </ul>   |
| Affordability      | <p>The Waiver is projected to meet the affordability guardrail as the affordability across the market is improved compared to the Baseline Without-Waiver Scenario.</p> <ul style="list-style-type: none"> <li>• Affordability for current Essential Plan members is not expected to change.</li> <li>• Affordability for consumers with incomes between 200–250% of the FPL is expected to improve under the Waiver for an aggregate savings of \$1.5 billion over the 5 years. <ul style="list-style-type: none"> <li>○ This is an average annual savings of \$4,700 under the Waiver (\$2,300 in premiums and \$2,400 in out-of-pocket spend), which is approximately 12% of income for consumers 200 – 250% of the FPL.</li> </ul> </li> <li>• Affordability for subsidized On-Exchange consumers is not expected to change under the Waiver.</li> <li>• Affordability for subsidy-ineligible On-Exchange consumers and Off-Exchange consumers is also not expected to change under the Waiver, as premiums will be calculated at without-waiver levels as part of the insurer reimbursement program.</li> </ul> |
| Coverage           | <p>The Waiver is projected to meet the coverage guardrail as more consumers are expected to enroll in coverage compared to the Baseline Without-Waiver Scenario.</p> <ul style="list-style-type: none"> <li>• Overall enrollment for the Essential Plan and individual market is expected to increase by a combined 1.0% for PY 2024, 2.2% for PY 2025, 2.2% for PY 2026, 2.1% for PY 2027, and 2.1% for PY 2028.</li> </ul>   |
| Deficit Neutrality | <p>The Waiver is projected to meet the deficit neutrality guardrail and generate savings for the federal government.</p> <ul style="list-style-type: none"> <li>• The federal spend under the Waiver is estimated to decrease by \$9.8 billion in PY 2024 (which reflects the impact of the April 1, 2023 implementation date) and \$65.9 billion over the 5-year Waiver period, before pass-through funding.</li> <li>• The net federal spend under the Waiver is estimated to remain the same in PY 2024 and over the 5-year Waiver period, after accounting for pass-through funding.</li> </ul>  |

**Table A2. Baseline Without-Waiver Summary of Enrollment, Premium, and Cost Estimates, PY 2024-2033**

| Baseline - Scenario A                         | 2024      | 2025      | 2026      | 2027      | 2028      | 2029      | 2030      | 2031      | 2032      | 2033      | 5-Year Total | 10-Year Total |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---------------|
| <b>Unsubsidized On/Off-Exchange</b>           |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 66,122    | 64,435    | 124,043   | 123,236   | 122,435   | 121,639   | 120,849   | 120,063   | 119,283   | 118,507   | 100,054      | 110,061       |
| Average Premium PMPM                          | \$802     | \$843     | \$868     | \$913     | \$961     | \$1,011   | \$1,063   | \$1,118   | \$1,176   | \$1,237   | \$890        | \$1,016       |
| <b>Subsidized On-Exchange</b>                 |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 236,570   | 237,659   | 149,369   | 150,356   | 151,349   | 152,348   | 153,354   | 154,367   | 155,387   | 156,413   | 185,061      | 169,717       |
| Average Premium PMPM                          | \$761     | \$801     | \$842     | \$886     | \$932     | \$981     | \$1,032   | \$1,085   | \$1,142   | \$1,201   | \$833        | \$949         |
| Average APTC PMPM                             | \$314     | \$345     | \$325     | \$358     | \$394     | \$432     | \$472     | \$514     | \$559     | \$607     | \$344        | \$423         |
| <b>Total Individual Market</b>                |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 302,692   | 302,094   | 273,412   | 273,592   | 273,784   | 273,988   | 274,203   | 274,430   | 274,670   | 274,920   | 285,115      | 279,779       |
| Average Premium PMPM                          | \$770     | \$810     | \$854     | \$898     | \$945     | \$994     | \$1,046   | \$1,100   | \$1,157   | \$1,217   | \$853        | \$975         |
| Aggregate Premiums (millions)                 | \$2,798   | \$2,936   | \$2,802   | \$2,950   | \$3,105   | \$3,268   | \$3,440   | \$3,622   | \$3,813   | \$4,014   | \$14,590     | \$32,747      |
| Projected Federal Spend (millions)            | \$833     | \$918     | \$544     | \$604     | \$668     | \$737     | \$810     | \$889     | \$973     | \$1,063   | \$3,567      | \$8,039       |
| <b>Essential Plan</b>                         |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 1,365,381 | 1,307,461 | 1,317,042 | 1,338,169 | 1,359,656 | 1,381,489 | 1,403,672 | 1,426,211 | 1,449,113 | 1,472,382 | 1,337,542    | 1,382,057     |
| Average Premium PMPM                          | \$625     | \$647     | \$671     | \$695     | \$720     | \$747     | \$774     | \$803     | \$832     | \$863     | \$672        | \$740         |
| Aggregate Premiums (millions)                 | \$10,237  | \$10,156  | \$10,601  | \$11,162  | \$11,755  | \$12,380  | \$13,041  | \$13,738  | \$14,474  | \$15,251  | \$53,912     | \$122,796     |
| Quality Incentive Pool Costs (millions)       | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$1,125      | \$2,250       |
| LTSS Coverage (millions)                      | \$0       | \$131     | \$137     | \$144     | \$152     | \$160     | \$168     | \$177     | \$187     | \$197     | \$563        | \$1,451       |
| SDoH/BH Grant Program (millions)              | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$125        | \$250         |
| Total Program Costs (millions)                | \$10,487  | \$10,537  | \$10,988  | \$11,556  | \$12,156  | \$12,790  | \$13,459  | \$14,165  | \$14,911  | \$15,698  | \$55,725     | \$126,747     |
| Projected Federal Spend (millions)            | \$12,829  | \$12,924  | \$13,126  | \$14,030  | \$14,997  | \$16,030  | \$17,134  | \$18,315  | \$19,577  | \$20,925  | \$67,907     | \$159,888     |
| <b>Employer Shared Responsibility Revenue</b> |           |           |           |           |           |           |           |           |           |           |              |               |
| Projected Federal Revenue (millions)          | (\$3)     | (\$3)     | (\$3)     | (\$3)     | (\$4)     | (\$4)     | (\$5)     | (\$6)     | (\$7)     | (\$8)     | (\$16)       | (\$45)        |
| <b>Combined Totals</b>                        |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 1,668,073 | 1,609,554 | 1,590,454 | 1,611,761 | 1,633,440 | 1,655,476 | 1,677,875 | 1,700,642 | 1,723,782 | 1,747,302 | 1,622,657    | 1,661,836     |
| Projected Federal Spend (millions)            | \$13,660  | \$13,839  | \$13,667  | \$14,631  | \$15,661  | \$16,762  | \$17,940  | \$19,198  | \$20,543  | \$21,981  | \$71,458     | \$167,883     |

<sup>1</sup>5- and 10-year totals are straight averages.

**Table A3. With-Waiver Summary of Enrollment, Premium, and Cost Estimates, PY 2024-2033**

| <b>With Waiver - Scenario A</b>               | 2024      | 2025      | 2026      | 2027      | 2028      | 2029      | 2030      | 2031      | 2032      | 2033      | 5-Year Total | 10-Year Total |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---------------|
| <b>Unsubsidized On/Off-Exchange</b>           |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 66,122    | 64,587    | 124,347   | 123,692   | 123,043   | 122,399   | 121,761   | 121,127   | 120,499   | 119,875   | 100,358      | 110,745       |
| Average Premium PMPM                          | \$802     | \$843     | \$868     | \$913     | \$961     | \$1,010   | \$1,063   | \$1,118   | \$1,176   | \$1,237   | \$890        | \$1,016       |
| <b>Subsidized On-Exchange</b>                 |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 186,174   | 170,243   | 87,405    | 87,979    | 88,556    | 89,138    | 89,724    | 90,313    | 90,906    | 91,503    | 124,071      | 107,194       |
| Average Premium PMPM                          | \$761     | \$801     | \$842     | \$886     | \$932     | \$981     | \$1,032   | \$1,085   | \$1,142   | \$1,201   | \$826        | \$937         |
| Average APTC PMPM                             | \$316     | \$345     | \$325     | \$358     | \$394     | \$432     | \$472     | \$514     | \$559     | \$607     | \$342        | \$416         |
| <b>Total Individual Market</b>                |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 252,296   | 234,830   | 211,752   | 211,671   | 211,599   | 211,537   | 211,485   | 211,440   | 211,405   | 211,378   | 224,430      | 217,939       |
| Average Premium PMPM                          | \$772     | \$812     | \$858     | \$902     | \$949     | \$998     | \$1,050   | \$1,104   | \$1,161   | \$1,221   | \$854        | \$977         |
| Aggregate Premiums (millions)                 | \$2,336   | \$2,289   | \$2,179   | \$2,291   | \$2,409   | \$2,533   | \$2,664   | \$2,801   | \$2,946   | \$3,098   | \$11,505     | \$25,547      |
| Projected Federal Spend (millions)            | \$659     | \$658     | \$318     | \$353     | \$391     | \$431     | \$474     | \$520     | \$569     | \$622     | \$2,379      | \$4,996       |
| <b>Essential Plan</b>                         |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 1,432,703 | 1,410,434 | 1,413,037 | 1,434,488 | 1,456,301 | 1,478,460 | 1,500,970 | 1,523,838 | 1,547,069 | 1,570,669 | 1,429,393    | 1,476,797     |
| Average Premium PMPM                          | \$629     | \$655     | \$678     | \$703     | \$728     | \$755     | \$783     | \$812     | \$841     | \$873     | \$679        | \$748         |
| Aggregate Premiums (millions)                 | \$10,818  | \$11,079  | \$11,495  | \$12,094  | \$12,726  | \$13,393  | \$14,097  | \$14,839  | \$15,622  | \$16,448  | \$58,211     | \$132,611     |
| IRIP Payment (millions)                       | \$45      | \$63      | \$60      | \$63      | \$66      | \$69      | \$73      | \$77      | \$80      | \$85      | \$295        | \$679         |
| Quality Incentive Pool Costs (millions)       | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$1,125      | \$2,250       |
| LTSS Coverage (millions)                      | \$0       | \$131     | \$136     | \$143     | \$150     | \$158     | \$167     | \$175     | \$185     | \$194     | \$560        | \$1,440       |
| SDoH/BH Grant Program (millions)              | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$125        | \$250         |
| Total Program Costs (millions)                | \$11,112  | \$11,522  | \$11,940  | \$12,549  | \$13,192  | \$13,871  | \$14,586  | \$15,341  | \$16,137  | \$16,978  | \$60,317     | \$137,230     |
| Projected Federal Spend (millions)            | \$3,207   | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$3,207      | \$3,207       |
| <b>Employer Shared Responsibility Revenue</b> |           |           |           |           |           |           |           |           |           |           |              |               |
| Projected Federal Revenue (millions)          | (\$1)     | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | (\$1)        | (\$1)         |
| <b>Combined Totals</b>                        |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 1,684,999 | 1,645,264 | 1,624,789 | 1,646,159 | 1,667,900 | 1,689,997 | 1,712,455 | 1,735,278 | 1,758,474 | 1,782,047 | 1,653,822    | 1,694,736     |
| Projected Federal Spend (millions)            | \$3,866   | \$658     | \$318     | \$353     | \$391     | \$431     | \$474     | \$520     | \$569     | \$622     | \$5,586      | \$8,202       |

<sup>1</sup>5- and 10-year totals are straight averages. 2024 enrollment, premium, and APTC amounts reflect the average monthly enrollment for the 12-month period. 2024 amounts in other With Waiver enrollment tables reflect a 9-month average after waiver implementation.

Note: The program investments for Quality Incentive Pool and SDoH/BH Grant Program for 2024 are displayed as total costs over all 12 months. The first 3 months of these amounts would be incurred under the BHP and the last 9 months would be incurred under the 1332 Waiver.

**Table A3. With-Waiver PY 2024 Break-Out**

|   | 200-250% FPL   | All Other FPL | 200-250% FPL    | All Other FPL |
|---|----------------|---------------|-----------------|---------------|
| <b>With Waiver - Scenario A</b>         | 1/1/24-3/31/24 |               | 4/1/24-12/31/24 |               |
| <b>Unsubsidized On/Off-Exchange</b>     |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 66,122        | 0               | 66,122        |
| Average Premium PMPM                    | \$0            | \$802         | \$0             | \$802         |
| <b>Subsidized On-Exchange</b>           |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 168,922       | 410             | 168,512       |
| Average Premium PMPM                    | \$756          | \$761         | \$756           | \$761         |
| Average APTC PMPM                       | \$332          | \$314         | \$332           | \$314         |
| <b>Total Individual Market</b>          |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 235,044       | 410             | 234,634       |
| Average Premium PMPM                    | \$756          | \$773         | \$756           | \$773         |
| Aggregate Premiums (millions)           | \$156          | \$545         | \$3             | \$1,632       |
| Projected Federal Spend (millions)      | \$64           | \$149         | \$1             | \$445         |
| <b>Essential Plan</b>                   |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 1,365,381     | 89,763          | 1,365,381     |
| Average Premium PMPM                    | \$0            | \$625         | \$718           | \$625         |
| Aggregate Premiums (millions)           | \$0            | \$2,559       | \$580           | \$7,678       |
| IRIP Payment (millions)                 | \$0            |               | \$45            |               |
| Quality Incentive Pool Costs (millions) | \$56           |               | \$169           |               |
| LTSS Coverage (millions)                | \$0            |               | \$0             |               |
| SDoH/BH Grant Program (millions)        | \$6            |               | \$19            |               |
| Total Program Costs (millions)          | \$2,778        |               | \$8,334         |               |
| Projected Federal Spend (millions)      | \$802          |               | \$2,405         |               |

**Table A4. Baseline Without and With-Waiver Annual Funding Estimates, PY 2024-2033**

| Scenario A                                    | 2024                    | 2025                     | 2026                    | 2027                    | 2028                    | 2029                    | 2030                    | 2031                    | 2032                    | 2033                    |
|---|-------------------------|--------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| <b>Individual Market</b>                      |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver PTCs                           | \$832,994,392           | \$918,399,798            | \$543,752,041           | \$603,685,799           | \$667,898,054           | \$736,660,976           | \$810,263,312           | \$889,011,384           | \$973,230,136           | \$1,063,264,246         |
| With Waiver PTCs                              | \$658,913,426           | \$657,880,975            | \$318,180,580           | \$353,238,621           | \$390,797,546           | \$431,016,325           | \$474,063,603           | \$520,118,284           | \$569,370,136           | \$622,020,447           |
| Difference                                    | \$174,080,966           | \$260,518,823            | \$225,571,462           | \$250,447,179           | \$277,100,509           | \$305,644,651           | \$336,199,708           | \$368,893,100           | \$403,860,000           | \$441,243,800           |
| <b>Essential Plan</b>                         |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver BHP Funding                    | \$12,829,257,312        | \$12,923,855,551         | \$13,126,291,459        | \$14,030,366,556        | \$14,996,951,508        | \$16,030,127,338        | \$17,134,481,121        | \$18,314,916,475        | \$19,576,674,841        | \$20,925,358,757        |
| With Waiver BHP Funding                       | \$3,207,314,328         | \$0                      | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     |
| Difference                                    | \$9,621,942,984         | \$12,923,855,551         | \$13,126,291,459        | \$14,030,366,556        | \$14,996,951,508        | \$16,030,127,338        | \$17,134,481,121        | \$18,314,916,475        | \$19,576,674,841        | \$20,925,358,757        |
| <b>Employer Shared Responsibility Revenue</b> |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Employer Penalty Loss                         | (\$2,592,000)           | (\$2,970,000)            | (\$3,006,000)           | (\$3,258,000)           | (\$3,746,700)           | (\$4,308,705)           | (\$4,955,011)           | (\$5,698,262)           | (\$6,553,002)           | (\$7,535,952)           |
| <b>Combined Totals</b>                        |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver Federal Spend                  | \$13,659,659,705        | \$13,839,285,349         | \$13,667,037,501        | \$14,630,794,355        | \$15,661,102,862        | \$16,762,479,609        | \$17,939,789,422        | \$19,198,229,596        | \$20,543,351,975        | \$21,981,087,051        |
| With Waiver Federal Spend                     | \$3,866,227,755         | \$657,880,975            | \$318,180,580           | \$353,238,621           | \$390,797,546           | \$431,016,325           | \$474,063,603           | \$520,118,284           | \$569,370,136           | \$622,020,447           |
| <b>Total Federal Savings</b>                  | <b>\$9,793,431,950</b>  | <b>\$13,181,404,374</b>  | <b>\$13,348,856,921</b> | <b>\$14,277,555,734</b> | <b>\$15,270,305,317</b> | <b>\$16,331,463,284</b> | <b>\$17,465,725,818</b> | <b>\$18,678,111,312</b> | <b>\$19,973,981,839</b> | <b>\$21,359,066,604</b> |
| Requested Pass-through                        | \$9,793,431,950         | \$13,181,404,374         | \$13,348,856,921        | \$14,277,555,734        | \$15,270,305,317        | \$16,331,463,284        | \$17,465,725,818        | \$18,678,111,312        | \$19,973,981,839        | \$21,359,066,604        |
| <b>Net Federal Savings</b>                    | <b>\$0</b>              | <b>\$0</b>               | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              |
| <b>Combined Totals</b>                        |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
|   | 5-Year Total            | 10-Year Total            |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver Federal Spend                  | \$71,457,879,772        | \$167,882,817,425        |                         |                         |                         |                         |                         |                         |                         |                         |
| With Waiver Federal Spend                     | \$5,586,325,475         | \$8,202,914,270          |                         |                         |                         |                         |                         |                         |                         |                         |
| <b>Total Federal Savings</b>                  | <b>\$65,871,554,296</b> | <b>\$159,679,903,155</b> |                         |                         |                         |                         |                         |                         |                         |                         |
| Requested Pass-through                        | \$65,871,554,296        | \$159,679,903,155        |                         |                         |                         |                         |                         |                         |                         |                         |
| <b>Net Federal Savings</b>                    | <b>\$0</b>              | <b>\$0</b>               |                         |                         |                         |                         |                         |                         |                         |                         |

Note: For 2024, due to the April 1 implementation date, there will still be 1 quarter of BHP funding compared to the other years of the Waiver.

**Table A5. SLCSP Premium Without and With-Waiver by Rating Area, PY 2024 – 2033**

| <b>Baseline - Scenario A</b>                                    | 2024  | 2025  | 2026  | 2027  | 2028  | 2029    | 2030    | 2031    | 2032    | 2033    |
|---|-------|-------|-------|-------|-------|---------|---------|---------|---------|---------|
| <i>Second Lowest Cost Silver Plans (SLCSP) Monthly Premiums</i> |       |       |       |       |       |         |         |         |         |         |
| Rating Area 1   | \$599 | \$630 | \$662 | \$697 | \$733 | \$771   | \$811   | \$853   | \$898   | \$945   |
| Rating Area 2   | \$512 | \$539 | \$567 | \$596 | \$627 | \$660   | \$694   | \$731   | \$769   | \$808   |
| Rating Area 3   | \$744 | \$782 | \$823 | \$866 | \$911 | \$958   | \$1,008 | \$1,061 | \$1,116 | \$1,174 |
| Rating Area 4   | \$808 | \$850 | \$894 | \$941 | \$990 | \$1,041 | \$1,095 | \$1,152 | \$1,212 | \$1,275 |
| Rating Area 5   | \$600 | \$631 | \$664 | \$699 | \$735 | \$773   | \$813   | \$856   | \$900   | \$947   |
| Rating Area 6   | \$617 | \$649 | \$683 | \$718 | \$756 | \$795   | \$836   | \$880   | \$926   | \$974   |
| Rating Area 7   | \$612 | \$644 | \$677 | \$712 | \$749 | \$788   | \$829   | \$872   | \$918   | \$965   |
| Rating Area 8   | \$775 | \$815 | \$857 | \$902 | \$949 | \$998   | \$1,050 | \$1,105 | \$1,162 | \$1,222 |
| <b>With Waiver - Scenario A</b>                                 | 2024  | 2025  | 2026  | 2027  | 2028  | 2029    | 2030    | 2031    | 2032    | 2033    |
| <i>Second Lowest Cost Silver Plans (SLCSP) Monthly Premiums</i> |       |       |       |       |       |         |         |         |         |         |
| Rating Area 1   | \$599 | \$630 | \$663 | \$697 | \$733 | \$772   | \$812   | \$854   | \$898   | \$945   |
| Rating Area 2   | \$512 | \$539 | \$567 | \$597 | \$628 | \$660   | \$695   | \$731   | \$769   | \$809   |
| Rating Area 3   | \$744 | \$783 | \$824 | \$866 | \$911 | \$959   | \$1,009 | \$1,061 | \$1,116 | \$1,174 |
| Rating Area 4   | \$808 | \$850 | \$895 | \$941 | \$990 | \$1,042 | \$1,096 | \$1,153 | \$1,213 | \$1,276 |
| Rating Area 5   | \$600 | \$632 | \$664 | \$699 | \$735 | \$774   | \$814   | \$856   | \$901   | \$948   |
| Rating Area 6   | \$617 | \$649 | \$683 | \$719 | \$756 | \$795   | \$837   | \$880   | \$926   | \$974   |
| Rating Area 7   | \$612 | \$644 | \$677 | \$713 | \$750 | \$789   | \$830   | \$873   | \$918   | \$966   |
| Rating Area 8   | \$775 | \$815 | \$858 | \$902 | \$949 | \$999   | \$1,051 | \$1,105 | \$1,163 | \$1,223 |



**Table A6. Baseline Without Waiver Average Annual Enrollment by Metal Level, PY 2024 – 2033**

| <b>Baseline - Scenario A</b>                   | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,668,073</b> | <b>1,609,554</b> | <b>1,590,454</b> | <b>1,611,761</b> | <b>1,633,440</b> | <b>1,655,476</b> | <b>1,677,875</b> | <b>1,700,642</b> | <b>1,723,782</b> | <b>1,747,302</b> |
| <i>Unsubsidized On/Off-Exchange Enrollment</i> | 66,122           | 64,435           | 124,043          | 123,236          | 122,435          | 121,639          | 120,849          | 120,063          | 119,283          | 118,507          |
| Catastrophic                                   | 5,073            | 5,025            | 4,739            | 4,730            | 4,722            | 4,714            | 4,706            | 4,699            | 4,691            | 4,684            |
| Bronze   | 21,026           | 20,462           | 42,758           | 42,472           | 42,189           | 41,907           | 41,627           | 41,349           | 41,072           | 40,797           |
| Silver   | 21,525           | 20,941           | 45,249           | 44,945           | 44,644           | 44,344           | 44,046           | 43,750           | 43,456           | 43,164           |
| Gold   | 10,038           | 9,771            | 17,674           | 17,556           | 17,439           | 17,322           | 17,206           | 17,091           | 16,977           | 16,863           |
| Platinum                                       | 8,461            | 8,236            | 13,624           | 13,533           | 13,442           | 13,352           | 13,263           | 13,174           | 13,086           | 12,999           |
| <i>Subsidized On-Exchange Enrollment</i>       | 236,570          | 237,659          | 149,369          | 150,356          | 151,349          | 152,348          | 153,354          | 154,367          | 155,387          | 156,413          |
| Catastrophic                                   | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Bronze   | 88,312           | 88,718           | 55,760           | 56,128           | 56,499           | 56,872           | 57,247           | 57,625           | 58,006           | 58,389           |
| Silver   | 96,331           | 96,774           | 60,823           | 61,225           | 61,629           | 62,036           | 62,446           | 62,858           | 63,273           | 63,691           |
| Gold   | 30,993           | 31,136           | 19,569           | 19,698           | 19,828           | 19,959           | 20,091           | 20,224           | 20,357           | 20,492           |
| Platinum                                       | 20,934           | 21,030           | 13,218           | 13,305           | 13,393           | 13,481           | 13,570           | 13,660           | 13,750           | 13,841           |
| <b>Essential Plan Enrollment</b>               | <b>1,365,381</b> | <b>1,307,461</b> | <b>1,317,042</b> | <b>1,338,169</b> | <b>1,359,656</b> | <b>1,381,489</b> | <b>1,403,672</b> | <b>1,426,211</b> | <b>1,449,113</b> | <b>1,472,382</b> |
| EP1  | 573,460          | 549,133          | 553,158          | 562,031          | 571,056          | 580,225          | 589,542          | 599,009          | 608,627          | 618,400          |
| EP2  | 163,846          | 156,895          | 158,045          | 160,580          | 163,159          | 165,779          | 168,441          | 171,145          | 173,894          | 176,686          |
| EP3  | 95,577           | 91,522           | 92,193           | 93,672           | 95,176           | 96,704           | 98,257           | 99,835           | 101,438          | 103,067          |
| EP4  | 532,498          | 509,910          | 513,646          | 521,886          | 530,266          | 538,781          | 547,432          | 556,222          | 565,154          | 574,229          |

**Table A7. With-Waiver Average Annual Enrollment by Metal Level, PY 2024 – 2033**

| <b>With Waiver - Scenario A</b>                | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,690,188</b> | <b>1,645,264</b> | <b>1,624,789</b> | <b>1,646,159</b> | <b>1,667,900</b> | <b>1,689,997</b> | <b>1,712,455</b> | <b>1,735,278</b> | <b>1,758,474</b> | <b>1,782,047</b> |
| <i>Unsubsidized On/Off-Exchange Enrollment</i> | 66,122           | 64,587           | 124,347          | 123,692          | 123,043          | 122,399          | 121,761          | 121,127          | 120,499          | 119,875          |
| Catastrophic                                   | 5,073            | 5,037            | 4,750            | 4,748            | 4,745            | 4,743            | 4,742            | 4,740            | 4,739            | 4,738            |
| Bronze   | 21,026           | 20,510           | 42,863           | 42,629           | 42,398           | 42,169           | 41,941           | 41,715           | 41,491           | 41,268           |
| Silver   | 21,525           | 20,991           | 45,360           | 45,112           | 44,865           | 44,621           | 44,379           | 44,138           | 43,899           | 43,662           |
| Gold   | 10,038           | 9,794            | 17,717           | 17,621           | 17,525           | 17,430           | 17,336           | 17,243           | 17,150           | 17,058           |
| Platinum                                       | 8,461            | 8,255            | 13,657           | 13,583           | 13,509           | 13,436           | 13,363           | 13,291           | 13,220           | 13,149           |
| <i>Subsidized On-Exchange Enrollment</i>       | 168,922          | 170,243          | 87,405           | 87,979           | 88,556           | 89,138           | 89,724           | 90,313           | 90,906           | 91,503           |
| Catastrophic                                   | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Bronze   | 63,059           | 63,552           | 32,628           | 32,842           | 33,058           | 33,275           | 33,494           | 33,714           | 33,935           | 34,158           |
| Silver   | 68,785           | 69,323           | 35,591           | 35,825           | 36,060           | 36,297           | 36,535           | 36,775           | 37,017           | 37,260           |
| Gold   | 22,131           | 22,304           | 11,451           | 11,526           | 11,602           | 11,678           | 11,755           | 11,832           | 11,910           | 11,988           |
| Platinum                                       | 14,948           | 15,065           | 7,734            | 7,785            | 7,836            | 7,888            | 7,940            | 7,992            | 8,044            | 8,097            |
| <b>Essential Plan Enrollment</b>               | <b>1,455,144</b> | <b>1,410,434</b> | <b>1,413,037</b> | <b>1,434,488</b> | <b>1,456,301</b> | <b>1,478,460</b> | <b>1,500,970</b> | <b>1,523,838</b> | <b>1,547,069</b> | <b>1,570,669</b> |
| EP1  | 573,460          | 549,133          | 553,158          | 562,031          | 571,056          | 580,225          | 589,542          | 599,009          | 608,627          | 618,400          |
| EP2  | 163,846          | 156,895          | 158,045          | 160,580          | 163,159          | 165,779          | 168,441          | 171,145          | 173,894          | 176,686          |
| EP3  | 95,577           | 91,522           | 92,193           | 93,672           | 95,176           | 96,704           | 98,257           | 99,835           | 101,438          | 103,067          |
| EP4  | 532,498          | 509,910          | 513,646          | 521,886          | 530,266          | 538,781          | 547,432          | 556,222          | 565,154          | 574,229          |
| QHP 200%-250% FPL Population                   | 89,763           | 102,973          | 95,995           | 96,319           | 96,645           | 96,971           | 97,298           | 97,627           | 97,957           | 98,288           |

Note: this table displays the With Waiver amounts as 9-month averages for 2024, since the first year of the waiver will only contain 9 months. There is an increase from the WoW scenario (~0.6% in total) for the on-exchange Unsubsidized and Subsidized population with incomes above 250% of the FPL. This is due to increased awareness, concentrated advertisement, and outreach activities with the implementation of the waiver.

**Table A8. Baseline Without-Waiver Average Annual Enrollment by FPL, PY 2024 – 2033**

| <b>Baseline - Scenario A</b>                   | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,668,073</b> | <b>1,609,554</b> | <b>1,590,454</b> | <b>1,611,761</b> | <b>1,633,440</b> | <b>1,655,476</b> | <b>1,677,875</b> | <b>1,700,642</b> | <b>1,723,782</b> | <b>1,747,302</b> |
| <b>Unsubsidized On/Off-Exchange Enrollment</b> | <b>66,122</b>    | <b>64,435</b>    | <b>124,043</b>   | <b>123,236</b>   | <b>122,435</b>   | <b>121,639</b>   | <b>120,849</b>   | <b>120,063</b>   | <b>119,283</b>   | <b>118,507</b>   |
| Below 400%                                     | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 401% - 500%                                    | 0                | 0                | 24,239           | 24,082           | 23,925           | 23,770           | 23,615           | 23,462           | 23,309           | 23,158           |
| 501% - 600%                                    | 0                | 0                | 12,400           | 12,319           | 12,239           | 12,159           | 12,080           | 12,002           | 11,924           | 11,846           |
| Over 600%                                      | 12,291           | 13,896           | 15,502           | 15,401           | 15,301           | 15,201           | 15,103           | 15,004           | 14,907           | 14,810           |
| Do Not Report                                  | 53,831           | 50,539           | 71,902           | 71,435           | 70,970           | 70,509           | 70,051           | 69,595           | 69,143           | 68,693           |
| <b>Subsidized On-Exchange Enrollment</b>       | <b>236,570</b>   | <b>237,659</b>   | <b>149,369</b>   | <b>150,356</b>   | <b>151,349</b>   | <b>152,348</b>   | <b>153,354</b>   | <b>154,367</b>   | <b>155,387</b>   | <b>156,413</b>   |
| Below 139%                                     | 7,523            | 7,558            | 4,750            | 4,782            | 4,813            | 4,845            | 4,877            | 4,909            | 4,942            | 4,974            |
| 139% - 150%                                    | 288              | 290              | 182              | 183              | 184              | 186              | 187              | 188              | 189              | 191              |
| 151% - 200%                                    | 1,757            | 1,765            | 1,110            | 1,117            | 1,124            | 1,132            | 1,139            | 1,147            | 1,154            | 1,162            |
| 201% - 250%                                    | 69,010           | 69,122           | 62,093           | 62,470           | 62,849           | 63,230           | 63,614           | 64,000           | 64,388           | 64,779           |
| 251% - 300%                                    | 54,227           | 54,547           | 36,619           | 36,876           | 37,134           | 37,395           | 37,657           | 37,921           | 38,187           | 38,455           |
| 301% - 350%                                    | 40,022           | 40,258           | 27,027           | 27,216           | 27,407           | 27,599           | 27,793           | 27,988           | 28,184           | 28,381           |
| 351% - 400%                                    | 26,047           | 26,201           | 17,589           | 17,713           | 17,837           | 17,962           | 18,088           | 18,215           | 18,342           | 18,471           |
| 401% - 500%                                    | 21,502           | 21,629           | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 501% - 600%                                    | 9,595            | 9,652            | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Over 600%                                      | 6,599            | 6,638            | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| <b>Essential Plan Enrollment</b>               | <b>1,365,381</b> | <b>1,307,461</b> | <b>1,317,042</b> | <b>1,338,169</b> | <b>1,359,656</b> | <b>1,381,489</b> | <b>1,403,672</b> | <b>1,426,211</b> | <b>1,449,113</b> | <b>1,472,382</b> |
| Below 150%                                     | 791,921          | 758,327          | 763,884          | 776,138          | 788,601          | 801,264          | 814,130          | 827,203          | 840,485          | 853,981          |
| Over 151%                                      | 573,460          | 549,133          | 553,158          | 562,031          | 571,056          | 580,225          | 589,542          | 599,009          | 608,627          | 618,400          |

**Table A9. With-Waiver PY Average Annual Enrollment by FPL, PY 2024 – 2033**

| <b>With Waiver - Scenario A</b>                | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,690,188</b> | <b>1,645,264</b> | <b>1,624,789</b> | <b>1,646,159</b> | <b>1,667,900</b> | <b>1,689,997</b> | <b>1,712,455</b> | <b>1,735,278</b> | <b>1,758,474</b> | <b>1,782,047</b> |
| <b>Unsubsidized On/Off-Exchange Enrollment</b> | 66,122           | 64,587           | 124,347          | 123,692          | 123,043          | 122,399          | 121,761          | 121,127          | 120,499          | 119,875          |
| Below 400% <sup>2</sup>                        | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 401% - 500% <sup>2</sup>                       | 0                | 0                | 24,299           | 24,171           | 24,044           | 23,918           | 23,793           | 23,670           | 23,547           | 23,425           |
| 501% - 600% <sup>2</sup>                       | 0                | 0                | 12,430           | 12,365           | 12,300           | 12,235           | 12,171           | 12,108           | 12,045           | 11,983           |
| Over 600% <sup>2</sup>                         | 12,314           | 13,927           | 15,540           | 15,458           | 15,377           | 15,296           | 15,217           | 15,137           | 15,059           | 14,981           |
| Do Not Report <sup>2</sup>                     | 53,808           | 50,660           | 72,078           | 71,699           | 71,323           | 70,949           | 70,579           | 70,212           | 69,848           | 69,486           |
| <b>Subsidized On-Exchange Enrollment</b>       | 168,922          | 170,243          | 87,405           | 87,979           | 88,556           | 89,138           | 89,724           | 90,313           | 90,906           | 91,503           |
| Below 139% <sup>1</sup>                        | 7,490            | 7,548            | 3,875            | 3,901            | 3,927            | 3,952            | 3,978            | 4,004            | 4,031            | 4,057            |
| 139% - 150% <sup>1</sup>                       | 287              | 289              | 149              | 149              | 150              | 151              | 152              | 153              | 154              | 155              |
| 151% - 200% <sup>1</sup>                       | 1,750            | 1,763            | 905              | 911              | 917              | 923              | 929              | 935              | 942              | 948              |
| 201% - 250%                                    | 410              | 413              | 212              | 213              | 215              | 216              | 218              | 219              | 220              | 222              |
| 251% - 300% <sup>2</sup>                       | 54,568           | 54,995           | 37,083           | 37,326           | 37,571           | 37,818           | 38,067           | 38,317           | 38,568           | 38,822           |
| 301% - 350% <sup>2</sup>                       | 40,274           | 40,589           | 27,369           | 27,548           | 27,729           | 27,912           | 28,095           | 28,279           | 28,465           | 28,652           |
| 351% - 400% <sup>2</sup>                       | 26,211           | 26,416           | 17,812           | 17,929           | 18,047           | 18,165           | 18,285           | 18,405           | 18,526           | 18,647           |
| 401% - 500% <sup>2</sup>                       | 21,637           | 21,807           | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 501% - 600% <sup>2</sup>                       | 9,655            | 9,731            | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Over 600% <sup>2</sup>                         | 6,641            | 6,693            | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| <b>Essential Plan Enrollment</b>               | <b>1,455,144</b> | <b>1,410,434</b> | <b>1,413,037</b> | <b>1,434,488</b> | <b>1,456,301</b> | <b>1,478,460</b> | <b>1,500,970</b> | <b>1,523,838</b> | <b>1,547,069</b> | <b>1,570,669</b> |
| Below 150%                                     | 791,921          | 758,327          | 763,884          | 776,138          | 788,601          | 801,264          | 814,130          | 827,203          | 840,485          | 853,981          |
| 151% - 200%                                    | 573,460          | 549,133          | 553,158          | 562,031          | 571,056          | 580,225          | 589,542          | 599,009          | 608,627          | 618,400          |
| Over 201%                                      | 89,763           | 102,973          | 95,995           | 96,319           | 96,645           | 96,971           | 97,298           | 97,627           | 97,957           | 98,288           |

<sup>1</sup> The decrease in enrollment from the WoW scenario (~0.4% in total) is due to the methodology for allocating estimated enrollment by income and does not reflect any changes in eligibility for this population that would cause consumers below 200% of FPL to lose coverage.

<sup>2</sup> There is an increase from the WoW scenario (~0.6% in total) for the on-exchange Unsubsidized and Subsidized population with incomes above 250% of the FPL. This is due to increased awareness, concentrated advertisement, and outreach activities with the implementation of the waiver.

Note: This table displays the With Waiver amounts as 9-month averages for 2024, since the first year of the waiver will only contain 9 months.

**Table A10. Without and With-Waiver Monthly Federal Funding PMPM by Metal Level and Rate Cohort, PY 2024 – 2033**

| <b>Without Waiver - Scenario A</b> | 2024         | 2025         | 2026         | 2027         | 2028         | 2029         | 2030           | 2031           | 2032           | 2033           |
|------------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|----------------|----------------|----------------|----------------|
| <b>Exchange Subsidized APTCs</b>   | \$314        | \$345        | \$325        | \$358        | \$394        | \$432        | \$472          | \$514          | \$559          | \$607          |
| Bronze                             | \$289        | \$313        | \$305        | \$331        | \$360        | \$389        | \$421          | \$454          | \$490          | \$527          |
| Silver                             | \$365        | \$398        | \$383        | \$418        | \$456        | \$496        | \$538          | \$583          | \$630          | \$681          |
| Gold                               | \$281        | \$317        | \$275        | \$315        | \$357        | \$403        | \$450          | \$501          | \$555          | \$613          |
| Platinum                           | \$237        | \$278        | \$216        | \$260        | \$308        | \$359        | \$413          | \$470          | \$531          | \$596          |
| <b>Essential Plan BHP Funding</b>  | <b>\$783</b> | <b>\$824</b> | <b>\$831</b> | <b>\$874</b> | <b>\$919</b> | <b>\$967</b> | <b>\$1,017</b> | <b>\$1,070</b> | <b>\$1,126</b> | <b>\$1,184</b> |
| EP1                                | \$704        | \$741        | \$711        | \$748        | \$786        | \$827        | \$870          | \$916          | \$963          | \$1,013        |
| EP2                                | \$771        | \$811        | \$809        | \$851        | \$896        | \$942        | \$991          | \$1,043        | \$1,097        | \$1,154        |
| EP3                                | \$835        | \$878        | \$915        | \$962        | \$1,012      | \$1,065      | \$1,120        | \$1,179        | \$1,240        | \$1,304        |
| EP4                                | \$862        | \$907        | \$951        | \$1,001      | \$1,053      | \$1,107      | \$1,165        | \$1,226        | \$1,289        | \$1,356        |
| <b>With Waiver - Scenario A</b>    | 2024         | 2025         | 2026         | 2027         | 2028         | 2029         | 2030           | 2031           | 2032           | 2033           |
| <b>Exchange Subsidized APTCs</b>   | \$314        | \$345        | \$325        | \$358        | \$394        | \$432        | \$472          | \$514          | \$559          | \$607          |
| Bronze                             | \$289        | \$313        | \$305        | \$331        | \$360        | \$389        | \$421          | \$454          | \$490          | \$527          |
| Silver                             | \$365        | \$398        | \$383        | \$418        | \$456        | \$496        | \$538          | \$583          | \$630          | \$681          |
| Gold                               | \$281        | \$317        | \$275        | \$315        | \$357        | \$403        | \$450          | \$501          | \$555          | \$613          |
| Platinum                           | \$237        | \$278        | \$216        | \$260        | \$308        | \$359        | \$413          | \$470          | \$531          | \$596          |
| <b>Essential Plan BHP Funding</b>  | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>     | <b>\$0</b>     | <b>\$0</b>     | <b>\$0</b>     |
| EP1                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |
| EP2                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |
| EP3                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |
| EP4                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |
| QHP 200%-250% FPL Population       | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |

**Table A11. Without and With Waiver - 5-Year Enrollment, Premium, and Federal Deficit Estimates, PY 2024 – 2033**

| <b>Without Waiver - Scenario A</b>   | <b>2024</b> | <b>2025</b> | <b>2026</b> | <b>2027</b> | <b>2028</b> | <b>2029</b> | <b>2030</b> | <b>2031</b> | <b>2032</b> | <b>2033</b> |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <i>Unsubsidized On-exchange &amp; Off-exchange Enrollment</i>                | 66,122      | 64,435      | 124,043     | 123,236     | 122,435     | 121,639     | 120,849     | 120,063     | 119,283     | 118,507     |
| Below 400%   | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| 401% - 500%  | 0           | 0           | 24,239      | 24,082      | 23,925      | 23,770      | 23,615      | 23,462      | 23,309      | 23,158      |
| 501% - 600%  | 0           | 0           | 12,400      | 12,319      | 12,239      | 12,159      | 12,080      | 12,002      | 11,924      | 11,846      |
| Over 600%  | 12,291      | 13,896      | 15,502      | 15,401      | 15,301      | 15,201      | 15,103      | 15,004      | 14,907      | 14,810      |
| Do Not Report  | 53,831      | 50,539      | 71,902      | 71,435      | 70,970      | 70,509      | 70,051      | 69,595      | 69,143      | 68,693      |
| <i>Unsubsidized On-exchange Enrollment</i>                                   | 16,531      | 16,109      | 74,426      | 73,942      | 73,461      | 72,984      | 72,509      | 72,038      | 71,570      | 71,104      |
| <i>Off-exchange Enrollment</i>   | 49,592      | 48,326      | 49,617      | 49,295      | 48,974      | 48,656      | 48,339      | 48,025      | 47,713      | 47,403      |
| <b>With Waiver - Scenario A</b>  | <b>2024</b> | <b>2025</b> | <b>2026</b> | <b>2027</b> | <b>2028</b> | <b>2029</b> | <b>2030</b> | <b>2031</b> | <b>2032</b> | <b>2033</b> |
| <i>Unsubsidized On-exchange &amp; Off-exchange Enrollment</i>                | 66,122      | 64,587      | 124,347     | 123,692     | 123,043     | 122,399     | 121,761     | 121,127     | 120,499     | 119,875     |
| Below 400%   | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| 401% - 500%  | 0           | 0           | 24,299      | 24,171      | 24,044      | 23,918      | 23,793      | 23,670      | 23,547      | 23,425      |
| 501% - 600%  | 0           | 0           | 12,430      | 12,365      | 12,300      | 12,235      | 12,171      | 12,108      | 12,045      | 11,983      |
| Over 600%  | 12,314      | 13,927      | 15,540      | 15,458      | 15,377      | 15,296      | 15,217      | 15,137      | 15,059      | 14,981      |
| Do Not Report  | 53,808      | 50,660      | 72,078      | 71,699      | 71,323      | 70,949      | 70,579      | 70,212      | 69,848      | 69,486      |
| <i>Unsubsidized On-exchange &amp; Off-exchange Premium Increase (Annual)</i> | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |
| <i>Unsubsidized On-exchange Enrollment</i>                                   | 16,531      | 16,147      | 74,608      | 74,215      | 73,826      | 73,439      | 73,057      | 72,676      | 72,299      | 71,925      |
| <i>Unsubsidized On-exchange Premium Increase (Annual)</i>                    | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |
| <i>Off-exchange Enrollment</i>   | 49,592      | 48,440      | 49,739      | 49,477      | 49,217      | 48,960      | 48,704      | 48,451      | 48,200      | 47,950      |
| <i>Off-exchange Premium Increase (Annual)</i>                                | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |

Note: due to IRIP, there are no expected increases of premiums for consumers that remain in the individual market compared to Without Waiver.

Note: there is an increase from the WoW scenario (~0.6% in total) for the on-exchange Unsubsidized and Subsidized population with incomes above 250% of the FPL. This is due to increased awareness, concentrated advertisement, and outreach activities with the implementation of the Waiver.

**Table A12. Without and With-Waiver Annual Out-of-Pocket Expenses by FPL, PY 2024 – 2033**

| <b>Without Waiver - Scenario A - FPL</b>                    | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | 2032    | 2033    | 5 Year  | 10 Year |
|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| <i>Exchange - Annual Out-of-Pocket Expenses - FPL</i>       |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 250%  | \$2,751 | \$2,895 | \$3,045 | \$3,203 | \$3,370 | \$3,545 | \$3,730 | \$3,923 | \$4,128 | \$4,342 | \$3,040 | \$3,481 |
| 251% - 300%   | \$2,643 | \$2,781 | \$2,925 | \$3,078 | \$3,238 | \$3,406 | \$3,583 | \$3,769 | \$3,965 | \$4,172 | \$2,898 | \$3,308 |
| 301% - 350%   | \$2,641 | \$2,778 | \$2,922 | \$3,074 | \$3,234 | \$3,402 | \$3,579 | \$3,766 | \$3,961 | \$4,167 | \$2,895 | \$3,304 |
| 351% - 400%   | \$2,653 | \$2,791 | \$2,936 | \$3,089 | \$3,250 | \$3,419 | \$3,596 | \$3,783 | \$3,980 | \$4,187 | \$2,909 | \$3,320 |
| 401% - 500%   | \$2,672 | \$2,811 | \$2,957 | \$3,111 | \$3,272 | \$3,442 | \$3,621 | \$3,810 | \$4,008 | \$4,216 | \$2,974 | \$3,399 |
| 501% - 600%   | \$2,686 | \$2,826 | \$2,973 | \$3,128 | \$3,290 | \$3,462 | \$3,642 | \$3,831 | \$4,030 | \$4,240 | \$3,002 | \$3,434 |
| Over 600%/Do Not Report                                     | \$2,742 | \$2,885 | \$3,034 | \$3,192 | \$3,358 | \$3,533 | \$3,717 | \$3,910 | \$4,113 | \$4,327 | \$3,058 | \$3,498 |
| <i>Essential Plan - Annual Out-of-Pocket Expenses - FPL</i> |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 150%  | \$9     | \$10    | \$10    | \$11    | \$11    | \$11    | \$12    | \$12    | \$13    | \$13    | \$10    | \$11    |
| Over 151%   | \$139   | \$145   | \$150   | \$156   | \$163   | \$169   | \$176   | \$183   | \$190   | \$198   | \$151   | \$168   |
| <b>With Waiver - Scenario A - FPL</b>                       | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | 2032    | 2033    | 5 Year  | 10 Year |
| <i>Exchange - Annual Out-of-Pocket Expenses - FPL</i>       |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 250%  | \$2,757 | \$2,901 | \$3,051 | \$3,210 | \$3,377 | \$3,553 | \$3,737 | \$3,932 | \$4,136 | \$4,351 | \$2,997 | \$3,403 |
| 251% - 300%   | \$2,648 | \$2,785 | \$2,930 | \$3,082 | \$3,243 | \$3,411 | \$3,589 | \$3,775 | \$3,972 | \$4,178 | \$2,903 | \$3,313 |
| 301% - 350%   | \$2,645 | \$2,782 | \$2,927 | \$3,079 | \$3,239 | \$3,408 | \$3,585 | \$3,771 | \$3,967 | \$4,174 | \$2,900 | \$3,310 |
| 351% - 400%   | \$2,657 | \$2,795 | \$2,941 | \$3,094 | \$3,255 | \$3,424 | \$3,602 | \$3,789 | \$3,986 | \$4,193 | \$2,914 | \$3,325 |
| 401% - 500%   | \$2,676 | \$2,815 | \$2,961 | \$3,115 | \$3,277 | \$3,448 | \$3,627 | \$3,816 | \$4,014 | \$4,223 | \$2,978 | \$3,405 |
| 501% - 600%   | \$2,691 | \$2,830 | \$2,978 | \$3,132 | \$3,295 | \$3,467 | \$3,647 | \$3,837 | \$4,036 | \$4,246 | \$3,006 | \$3,440 |
| Over 600%/Do Not Report                                     | \$2,746 | \$2,889 | \$3,039 | \$3,197 | \$3,363 | \$3,538 | \$3,722 | \$3,916 | \$4,119 | \$4,333 | \$3,063 | \$3,504 |
| <i>Essential Plan - Annual Out-of-Pocket Expenses - FPL</i> |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 150%  | \$9     | \$10    | \$10    | \$11    | \$11    | \$11    | \$12    | \$12    | \$13    | \$13    | \$10    | \$11    |
| 151% - 200%   | \$139   | \$145   | \$150   | \$156   | \$163   | \$169   | \$176   | \$183   | \$190   | \$198   | \$151   | \$168   |
| Over 201%   | \$238   | \$247   | \$257   | \$267   | \$278   | \$289   | \$301   | \$313   | \$325   | \$338   | \$257   | \$286   |

**Table A13. Without and With-Waiver Annual Out-of-Pocket Expenses by Age, PY 2024 – 2033**

| <b>Without Waiver - Scenario A - Age</b>                    | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | 2032    | 2033    | 5 Year  | 10 Year |
|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| <b>Exchange - Annual Out-of-Pocket Expenses - Age</b>       |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$1,131 | \$1,190 | \$1,252 | \$1,317 | \$1,386 | \$1,458 | \$1,533 | \$1,613 | \$1,697 | \$1,785 | \$1,255 | \$1,436 |
| 21 - 25 Years   | \$1,126 | \$1,184 | \$1,246 | \$1,311 | \$1,379 | \$1,450 | \$1,526 | \$1,605 | \$1,689 | \$1,776 | \$1,249 | \$1,429 |
| 26 - 30 Years   | \$1,459 | \$1,534 | \$1,614 | \$1,698 | \$1,787 | \$1,879 | \$1,977 | \$2,080 | \$2,188 | \$2,302 | \$1,618 | \$1,852 |
| 31 - 35 Years   | \$1,783 | \$1,876 | \$1,973 | \$2,076 | \$2,184 | \$2,297 | \$2,417 | \$2,542 | \$2,675 | \$2,814 | \$1,978 | \$2,264 |
| 36 - 40 Years   | \$1,960 | \$2,062 | \$2,169 | \$2,282 | \$2,401 | \$2,526 | \$2,657 | \$2,795 | \$2,941 | \$3,094 | \$2,175 | \$2,489 |
| 41 - 45 Years   | \$2,186 | \$2,299 | \$2,419 | \$2,545 | \$2,677 | \$2,816 | \$2,963 | \$3,117 | \$3,279 | \$3,449 | \$2,425 | \$2,775 |
| 46 - 50 Years   | \$2,578 | \$2,712 | \$2,853 | \$3,001 | \$3,158 | \$3,322 | \$3,494 | \$3,676 | \$3,867 | \$4,068 | \$2,860 | \$3,273 |
| 51 - 55 Years   | \$3,180 | \$3,346 | \$3,520 | \$3,703 | \$3,895 | \$4,098 | \$4,311 | \$4,535 | \$4,771 | \$5,019 | \$3,529 | \$4,038 |
| 56 - 60 Years   | \$3,896 | \$4,098 | \$4,311 | \$4,536 | \$4,772 | \$5,020 | \$5,281 | \$5,555 | \$5,844 | \$6,148 | \$4,323 | \$4,946 |
| 61 - 65 Years   | \$4,802 | \$5,052 | \$5,315 | \$5,591 | \$5,882 | \$6,188 | \$6,509 | \$6,848 | \$7,204 | \$7,578 | \$5,328 | \$6,097 |
| <b>Essential Plan - Annual Out-of-Pocket Expenses - Age</b> |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$45    | \$47    | \$48    | \$50    | \$52    | \$54    | \$57    | \$59    | \$61    | \$64    | \$49    | \$54    |
| 21 - 25 Years   | \$45    | \$46    | \$48    | \$50    | \$52    | \$54    | \$56    | \$59    | \$61    | \$63    | \$48    | \$54    |
| 26 - 30 Years   | \$58    | \$60    | \$62    | \$65    | \$68    | \$70    | \$73    | \$76    | \$79    | \$82    | \$63    | \$69    |
| 31 - 35 Years   | \$71    | \$73    | \$76    | \$79    | \$83    | \$86    | \$89    | \$93    | \$97    | \$100   | \$76    | \$85    |
| 36 - 40 Years   | \$78    | \$81    | \$84    | \$87    | \$91    | \$94    | \$98    | \$102   | \$106   | \$110   | \$84    | \$93    |
| 41 - 45 Years   | \$87    | \$90    | \$94    | \$97    | \$101   | \$105   | \$109   | \$114   | \$118   | \$123   | \$94    | \$104   |
| 46 - 50 Years   | \$102   | \$106   | \$110   | \$115   | \$119   | \$124   | \$129   | \$134   | \$140   | \$145   | \$111   | \$123   |
| 51 - 55 Years   | \$126   | \$131   | \$136   | \$142   | \$147   | \$153   | \$159   | \$166   | \$172   | \$179   | \$136   | \$151   |
| 56 - 60 Years   | \$154   | \$160   | \$167   | \$174   | \$180   | \$188   | \$195   | \$203   | \$211   | \$220   | \$167   | \$185   |
| 61 - 65 Years   | \$190   | \$198   | \$206   | \$214   | \$222   | \$231   | \$241   | \$250   | \$260   | \$271   | \$206   | \$228   |
| <b>With Waiver - Scenario A - Age</b>                       |         |         |         |         |         |         |         |         |         |         |         |         |
| <b>Exchange - Annual Out-of-Pocket Expenses - Age</b>       |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$1,126 | \$1,185 | \$1,247 | \$1,312 | \$1,380 | \$1,451 | \$1,527 | \$1,606 | \$1,690 | \$1,778 | \$1,250 | \$1,430 |
| 21 - 25 Years   | \$1,121 | \$1,179 | \$1,240 | \$1,305 | \$1,373 | \$1,444 | \$1,519 | \$1,598 | \$1,681 | \$1,769 | \$1,244 | \$1,423 |
| 26 - 30 Years   | \$1,453 | \$1,528 | \$1,607 | \$1,691 | \$1,779 | \$1,872 | \$1,969 | \$2,071 | \$2,179 | \$2,292 | \$1,612 | \$1,844 |
| 31 - 35 Years   | \$1,775 | \$1,868 | \$1,965 | \$2,067 | \$2,175 | \$2,288 | \$2,407 | \$2,532 | \$2,663 | \$2,802 | \$1,970 | \$2,254 |
| 36 - 40 Years   | \$1,952 | \$2,054 | \$2,160 | \$2,273 | \$2,391 | \$2,515 | \$2,646 | \$2,784 | \$2,928 | \$3,081 | \$2,166 | \$2,478 |
| 41 - 45 Years   | \$2,176 | \$2,290 | \$2,409 | \$2,534 | \$2,666 | \$2,804 | \$2,950 | \$3,104 | \$3,265 | \$3,435 | \$2,415 | \$2,763 |
| 46 - 50 Years   | \$2,567 | \$2,701 | \$2,841 | \$2,989 | \$3,144 | \$3,308 | \$3,480 | \$3,661 | \$3,851 | \$4,051 | \$2,848 | \$3,259 |
| 51 - 55 Years   | \$3,167 | \$3,331 | \$3,505 | \$3,687 | \$3,879 | \$4,080 | \$4,293 | \$4,516 | \$4,751 | \$4,998 | \$3,514 | \$4,021 |
| 56 - 60 Years   | \$3,879 | \$4,081 | \$4,293 | \$4,517 | \$4,751 | \$4,999 | \$5,258 | \$5,532 | \$5,820 | \$6,122 | \$4,304 | \$4,925 |
| 61 - 65 Years   | \$4,782 | \$5,031 | \$5,292 | \$5,567 | \$5,857 | \$6,162 | \$6,482 | \$6,819 | \$7,174 | \$7,547 | \$5,306 | \$6,071 |
| <b>Essential Plan - Annual Out-of-Pocket Expenses - Age</b> |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$49    | \$51    | \$53    | \$55    | \$57    | \$59    | \$62    | \$64    | \$67    | \$69    | \$53    | \$59    |
| 21 - 25 Years   | \$48    | \$50    | \$52    | \$55    | \$57    | \$59    | \$61    | \$64    | \$66    | \$69    | \$53    | \$58    |
| 26 - 30 Years   | \$63    | \$65    | \$68    | \$71    | \$74    | \$76    | \$80    | \$83    | \$86    | \$89    | \$68    | \$75    |
| 31 - 35 Years   | \$77    | \$80    | \$83    | \$86    | \$90    | \$93    | \$97    | \$101   | \$105   | \$109   | \$83    | \$92    |
| 36 - 40 Years   | \$84    | \$88    | \$91    | \$95    | \$99    | \$103   | \$107   | \$111   | \$116   | \$120   | \$91    | \$101   |
| 41 - 45 Years   | \$94    | \$98    | \$102   | \$106   | \$110   | \$115   | \$119   | \$124   | \$129   | \$134   | \$102   | \$113   |
| 46 - 50 Years   | \$111   | \$115   | \$120   | \$125   | \$130   | \$135   | \$141   | \$146   | \$152   | \$158   | \$120   | \$133   |
| 51 - 55 Years   | \$137   | \$142   | \$148   | \$154   | \$160   | \$167   | \$173   | \$180   | \$187   | \$195   | \$148   | \$164   |
| 56 - 60 Years   | \$168   | \$175   | \$182   | \$189   | \$196   | \$204   | \$212   | \$221   | \$230   | \$239   | \$182   | \$201   |
| 61 - 65 Years   | \$207   | \$215   | \$224   | \$233   | \$242   | \$252   | \$262   | \$272   | \$283   | \$294   | \$224   | \$248   |



**Table A14. Without and With-Waiver Annual Enrollment by Age, PY 2024 – 2033**

| Without Waiver - Scenario A - Age        | 2024      | 2025      | 2026      | 2027      | 2028      | 2029      | 2030      | 2031      | 2032      | 2033      | 5 Year    | 10 Year   |
|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| <b>Exchange - Enrollment - Age</b>       |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 302,692   | 302,094   | 273,412   | 273,592   | 273,784   | 273,988   | 274,203   | 274,430   | 274,670   | 274,920   | 285,115   | 279,779   |
| 00 - 20 Years                            | 22,981    | 22,874    | 21,009    | 21,004    | 21,000    | 20,998    | 20,996    | 20,995    | 20,994    | 20,995    | 21,774    | 21,385    |
| 21 - 25 Years                            | 16,810    | 16,768    | 15,221    | 15,228    | 15,236    | 15,245    | 15,245    | 15,254    | 15,264    | 15,275    | 15,286    | 15,559    |
| 26 - 30 Years                            | 25,800    | 25,777    | 23,186    | 23,210    | 23,235    | 23,261    | 23,288    | 23,316    | 23,345    | 23,375    | 24,242    | 23,779    |
| 31 - 35 Years                            | 26,063    | 26,058    | 23,350    | 23,380    | 23,410    | 23,442    | 23,474    | 23,508    | 23,542    | 23,578    | 24,452    | 23,981    |
| 36 - 40 Years                            | 23,972    | 23,964    | 21,493    | 21,519    | 21,546    | 21,574    | 21,603    | 21,632    | 21,663    | 21,695    | 22,499    | 22,066    |
| 41 - 45 Years                            | 23,948    | 23,932    | 21,501    | 21,525    | 21,550    | 21,575    | 21,602    | 21,629    | 21,658    | 21,687    | 22,491    | 22,061    |
| 46 - 50 Years                            | 26,738    | 26,708    | 24,057    | 24,079    | 24,103    | 24,128    | 24,154    | 24,181    | 24,209    | 24,238    | 25,137    | 24,660    |
| 51 - 55 Years                            | 34,911    | 34,845    | 31,520    | 31,542    | 31,565    | 31,589    | 31,615    | 31,642    | 31,671    | 31,701    | 32,876    | 32,260    |
| 56 - 60 Years                            | 47,162    | 47,035    | 42,742    | 42,759    | 42,779    | 42,800    | 42,824    | 42,849    | 42,876    | 42,904    | 44,495    | 43,673    |
| 61 - 65 Years                            | 49,962    | 49,797    | 45,402    | 45,412    | 45,423    | 45,437    | 45,453    | 45,470    | 45,490    | 45,511    | 47,199    | 46,336    |
| 65+ Years                                | 4,346     | 4,336     | 3,931     | 3,933     | 3,935     | 3,938     | 3,941     | 3,944     | 3,947     | 3,950     | 4,096     | 4,020     |
| <b>Essential Plan - Enrollment - Age</b> |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 1,365,381 | 1,307,461 | 1,317,042 | 1,338,169 | 1,359,656 | 1,381,489 | 1,403,672 | 1,426,211 | 1,449,113 | 1,472,382 | 1,337,542 | 1,382,057 |
| 00 - 20 Years                            | 22,968    | 21,994    | 22,155    | 22,511    | 22,872    | 23,239    | 23,612    | 23,992    | 24,377    | 24,768    | 22,500    | 23,249    |
| 21 - 25 Years                            | 133,178   | 127,528   | 128,463   | 130,524   | 132,620   | 134,749   | 136,913   | 139,111   | 141,345   | 143,615   | 130,463   | 134,805   |
| 26 - 30 Years                            | 185,132   | 177,279   | 178,578   | 181,442   | 184,356   | 187,316   | 190,324   | 193,380   | 196,485   | 199,640   | 181,357   | 187,393   |
| 31 - 35 Years                            | 174,980   | 167,557   | 168,785   | 171,492   | 174,246   | 177,044   | 179,887   | 182,775   | 185,710   | 188,692   | 171,412   | 177,117   |
| 36 - 40 Years                            | 164,741   | 157,753   | 158,909   | 161,458   | 164,051   | 166,685   | 169,362   | 172,081   | 174,844   | 177,652   | 161,382   | 166,754   |
| 41 - 45 Years                            | 158,981   | 152,237   | 153,353   | 155,812   | 158,314   | 160,857   | 163,439   | 166,064   | 168,730   | 171,440   | 155,739   | 160,923   |
| 46 - 50 Years                            | 149,534   | 143,191   | 144,240   | 146,554   | 148,907   | 151,298   | 153,727   | 156,196   | 158,704   | 161,252   | 146,485   | 151,360   |
| 51 - 55 Years                            | 143,638   | 137,545   | 138,553   | 140,775   | 143,036   | 145,332   | 147,666   | 150,037   | 152,446   | 154,894   | 140,709   | 145,392   |
| 56 - 60 Years                            | 136,399   | 130,613   | 131,570   | 133,680   | 135,827   | 138,008   | 140,224   | 142,475   | 144,763   | 147,088   | 133,618   | 138,065   |
| 61 - 65 Years                            | 95,830    | 91,765    | 92,437    | 93,920    | 95,428    | 96,961    | 98,518    | 100,100   | 101,707   | 103,340   | 93,876    | 97,001    |
| 65+ Years                                | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         |
| <b>With Waiver - Scenario A - Age</b>    |           |           |           |           |           |           |           |           |           |           |           |           |
| <b>Exchange - Enrollment - Age</b>       |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 235,044   | 234,830   | 211,752   | 211,671   | 211,599   | 211,537   | 211,485   | 211,440   | 211,405   | 211,378   | 220,979   | 216,214   |
| 00 - 20 Years                            | 20,741    | 20,670    | 18,946    | 18,940    | 18,934    | 18,930    | 18,926    | 18,922    | 18,920    | 18,918    | 19,646    | 19,285    |
| 21 - 25 Years                            | 12,419    | 12,397    | 11,228    | 11,217    | 11,208    | 11,198    | 11,189    | 11,181    | 11,173    | 11,166    | 11,694    | 11,438    |
| 26 - 30 Years                            | 16,894    | 16,898    | 15,099    | 15,083    | 15,067    | 15,052    | 15,037    | 15,024    | 15,011    | 14,998    | 15,808    | 15,416    |
| 31 - 35 Years                            | 18,804    | 18,828    | 16,740    | 16,738    | 16,736    | 16,735    | 16,735    | 16,735    | 16,736    | 16,738    | 17,569    | 17,152    |
| 36 - 40 Years                            | 17,352    | 17,371    | 15,466    | 15,463    | 15,460    | 15,459    | 15,458    | 15,457    | 15,458    | 15,459    | 16,222    | 15,840    |
| 41 - 45 Years                            | 17,652    | 17,664    | 15,767    | 15,764    | 15,761    | 15,760    | 15,758    | 15,758    | 15,758    | 15,759    | 16,522    | 16,140    |
| 46 - 50 Years                            | 20,384    | 20,387    | 18,265    | 18,262    | 18,260    | 18,258    | 18,257    | 18,257    | 18,258    | 18,260    | 19,112    | 18,685    |
| 51 - 55 Years                            | 27,411    | 27,390    | 24,680    | 24,673    | 24,667    | 24,663    | 24,659    | 24,657    | 24,655    | 24,655    | 25,764    | 25,211    |
| 56 - 60 Years                            | 38,281    | 38,217    | 34,634    | 34,622    | 34,611    | 34,601    | 34,593    | 34,586    | 34,581    | 34,577    | 36,073    | 35,330    |
| 61 - 65 Years                            | 40,741    | 40,645    | 36,989    | 36,969    | 36,950    | 36,933    | 36,918    | 36,904    | 36,892    | 36,881    | 38,459    | 37,682    |
| 65+ Years                                | 4,365     | 4,363     | 3,937     | 3,941     | 3,945     | 3,949     | 3,954     | 3,958     | 3,963     | 3,968     | 4,110     | 4,034     |
| <b>Essential Plan - Enrollment - Age</b> |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 1,455,144 | 1,410,434 | 1,413,037 | 1,434,488 | 1,456,301 | 1,478,460 | 1,500,970 | 1,523,838 | 1,547,069 | 1,570,669 | 1,433,881 | 1,479,041 |
| 00 - 20 Years                            | 25,649    | 24,899    | 24,823    | 25,191    | 25,564    | 25,943    | 26,328    | 26,720    | 27,117    | 27,521    | 25,225    | 25,975    |
| 21 - 25 Years                            | 139,667   | 135,303   | 135,787   | 137,867   | 139,982   | 142,131   | 144,314   | 146,532   | 148,785   | 151,074   | 137,721   | 142,144   |
| 26 - 30 Years                            | 196,973   | 190,911   | 191,297   | 194,204   | 197,160   | 200,162   | 203,213   | 206,312   | 209,460   | 212,658   | 194,109   | 200,235   |
| 31 - 35 Years                            | 185,025   | 179,293   | 179,775   | 182,516   | 185,303   | 188,135   | 191,012   | 193,934   | 196,903   | 199,919   | 182,382   | 188,182   |
| 36 - 40 Years                            | 173,981   | 168,584   | 169,060   | 171,640   | 174,263   | 176,927   | 179,635   | 182,385   | 185,179   | 188,017   | 171,505   | 176,967   |
| 41 - 45 Years                            | 167,807   | 162,598   | 163,067   | 165,556   | 168,087   | 170,658   | 173,270   | 175,924   | 178,619   | 181,358   | 165,423   | 170,694   |
| 46 - 50 Years                            | 158,285   | 153,386   | 153,782   | 156,125   | 158,508   | 160,929   | 163,388   | 165,886   | 168,425   | 171,003   | 156,017   | 160,972   |
| 51 - 55 Years                            | 153,478   | 148,776   | 149,009   | 151,268   | 153,565   | 155,898   | 158,268   | 160,676   | 163,122   | 165,607   | 151,219   | 155,967   |
| 56 - 60 Years                            | 147,559   | 143,096   | 143,133   | 145,287   | 147,479   | 149,704   | 151,965   | 154,262   | 156,595   | 158,965   | 145,311   | 149,804   |
| 61 - 65 Years                            | 106,719   | 103,589   | 103,304   | 104,835   | 106,391   | 107,971   | 109,577   | 111,207   | 112,864   | 114,546   | 104,967   | 108,100   |
| 65+ Years                                | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         |

## Updated Appendix B: Scenario B Detailed 10-Year Estimates (IRA Subsidies Are Extended & Insurer Reimbursement)

The following provides an analysis of the proposed 1332 Waiver under current law for the expansion to consumers with incomes between 200 – 250% of the FPL. The analysis estimates that the proposed Waiver meets each of the four guardrails for the five years of the Waiver and 10-year analysis.

**Table B1. Scenario B High-Level Guardrail Compliance of 1332 Waiver**

| Guardrail          | Estimated Impact With-Waiver (WW) Compared to Without-Waiver (WoW)   |
|--------------------|--|
| Comprehensiveness  | <p>The Waiver is projected to meet the comprehensiveness guardrail as consumers have access to more comprehensive coverage compared to the Baseline Without-Waiver Scenario.</p> <ul style="list-style-type: none"> <li>• Consumers with incomes between 200 – 250% of the FPL will experience an increase in comprehensiveness.</li> <li>• There are no expected impacts for other consumers in the individual market.</li> <li>• There are no expected impacts for other consumers in the Essential Plan.</li> </ul>   |
| Affordability      | <p>The Waiver is projected to meet the affordability guardrail as the affordability across the market is improved compared to the Baseline Without-Waiver Scenario.</p> <ul style="list-style-type: none"> <li>• Affordability for current Essential Plan members is not expected to change.</li> <li>• Affordability for consumers with incomes between 200-250% of the FPL is expected to improve under the Waiver for an aggregate savings of \$1.5 billion over the 5 years. <ul style="list-style-type: none"> <li>○ This is an average annual savings of \$4,600 under the Waiver (\$2,200 in premiums and \$2,400 in out-of-pocket spend), which is approximately 12% of income for consumers 200 – 250% of the FPL.</li> </ul> </li> <li>• Affordability for subsidized On-Exchange consumers is not expected to change under the Waiver.</li> <li>• Affordability for subsidy-ineligible On-Exchange consumers and Off-Exchange consumers is also not expected to change under the Waiver, as premiums will be calculated at without-waiver levels as part of the insurer reimbursement program.</li> </ul> |
| Coverage           | <p>The Waiver is projected to meet the coverage guardrail as more consumers are expected to enroll in coverage compared to the Baseline Without-Waiver Scenario.</p> <ul style="list-style-type: none"> <li>• Overall enrollment for the Essential Plan and individual market is expected to increase by a combined 1.0% for PY 2024, 2.2% for PY 2025, 1.8% for PY 2026, 1.8% for PY 2027, and 1.7% for PY 2028.</li> </ul>   |
| Deficit Neutrality | <p>The Waiver is projected to meet the deficit neutrality guardrail and generate savings for the federal government.</p> <ul style="list-style-type: none"> <li>• The federal spend under the Waiver is estimated to decrease by \$9.8 billion in PY 2024 (which reflects the impact of the April 1, 2023 implementation date) and \$69.0 billion over the 5-year Waiver period, before pass-through funding.</li> <li>• The net federal spend under the Waiver is estimated to remain the same in PY 2024 and over the 5-year Waiver period, after accounting for pass-through funding.</li> </ul>  |

**Table B2. Baseline Without-Waiver Summary of Enrollment, Premium, and Cost Estimates, PY 2024-2033**

| <b>Baseline - Scenario B</b>                  | 2024      | 2025      | 2026      | 2027      | 2028      | 2029      | 2030      | 2031      | 2032      | 2033      | 5-Year Total | 10-Year Total |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---------------|
| <b>Unsubsidized On/Off-Exchange</b>           |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 66,122    | 64,435    | 62,609    | 60,248    | 57,976    | 55,790    | 53,686    | 51,662    | 49,714    | 47,839    | 62,278       | 57,008        |
| Average Premium PMPM                          | \$802     | \$843     | \$886     | \$931     | \$978     | \$1,027   | \$1,079   | \$1,133   | \$1,190   | \$1,249   | \$885        | \$997         |
| <b>Subsidized On-Exchange</b>                 |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 236,570   | 237,659   | 239,503   | 241,952   | 244,435   | 246,953   | 249,506   | 252,095   | 254,721   | 257,385   | 240,024      | 246,078       |
| Average Premium PMPM                          | \$761     | \$801     | \$842     | \$886     | \$932     | \$981     | \$1,032   | \$1,085   | \$1,142   | \$1,201   | \$845        | \$970         |
| Average APTC PMPM                             | \$314     | \$345     | \$378     | \$412     | \$449     | \$487     | \$529     | \$572     | \$618     | \$667     | \$380        | \$480         |
| <b>Total Individual Market</b>                |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 302,692   | 302,094   | 302,112   | 302,200   | 302,411   | 302,743   | 303,192   | 303,757   | 304,435   | 305,224   | 302,302      | 303,086       |
| Average Premium PMPM                          | \$770     | \$810     | \$852     | \$895     | \$941     | \$989     | \$1,040   | \$1,094   | \$1,150   | \$1,209   | \$854        | \$975         |
| Aggregate Premiums (millions)                 | \$2,798   | \$2,936   | \$3,087   | \$3,246   | \$3,415   | \$3,594   | \$3,784   | \$3,986   | \$4,200   | \$4,427   | \$15,482     | \$35,474      |
| Projected Federal Spend (millions)            | \$833     | \$918     | \$1,013   | \$1,117   | \$1,228   | \$1,348   | \$1,477   | \$1,616   | \$1,764   | \$1,924   | \$5,109      | \$13,238      |
| <b>Essential Plan</b>                         |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 1,365,381 | 1,307,461 | 1,317,042 | 1,338,169 | 1,359,656 | 1,381,489 | 1,403,672 | 1,426,211 | 1,449,113 | 1,472,382 | 1,337,542    | 1,382,057     |
| Average Premium PMPM                          | \$625     | \$647     | \$671     | \$695     | \$720     | \$747     | \$774     | \$803     | \$832     | \$863     | \$672        | \$740         |
| Aggregate Premiums (millions)                 | \$10,237  | \$10,156  | \$10,601  | \$11,162  | \$11,755  | \$12,380  | \$13,041  | \$13,738  | \$14,474  | \$15,251  | \$53,912     | \$122,796     |
| Quality Incentive Pool Costs (millions)       | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$1,125      | \$2,250       |
| LTSS Coverage (millions)                      | \$0       | \$131     | \$137     | \$144     | \$152     | \$160     | \$168     | \$177     | \$187     | \$197     | \$563        | \$1,451       |
| SDoH/BH Grant Program (millions)              | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$125        | \$250         |
| Total Program Costs (millions)                | \$10,487  | \$10,537  | \$10,988  | \$11,556  | \$12,156  | \$12,790  | \$13,459  | \$14,165  | \$14,911  | \$15,698  | \$55,725     | \$126,747     |
| Projected Federal Spend (millions)            | \$12,829  | \$12,924  | \$14,026  | \$14,992  | \$16,025  | \$17,129  | \$18,309  | \$19,571  | \$20,919  | \$22,360  | \$70,797     | \$169,086     |
| <b>Employer Shared Responsibility Revenue</b> |           |           |           |           |           |           |           |           |           |           |              |               |
| Projected Federal Revenue (millions)          | (\$3)     | (\$3)     | (\$3)     | (\$3)     | (\$4)     | (\$4)     | (\$5)     | (\$6)     | (\$7)     | (\$8)     | (\$16)       | (\$45)        |
| <b>Combined Totals</b>                        |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 1,668,073 | 1,609,554 | 1,619,155 | 1,640,369 | 1,662,067 | 1,684,232 | 1,706,864 | 1,729,969 | 1,753,548 | 1,777,606 | 1,639,844    | 1,685,144     |
| Projected Federal Spend (millions)            | \$13,660  | \$13,839  | \$15,036  | \$16,106  | \$17,250  | \$18,473  | \$19,782  | \$21,181  | \$22,677  | \$24,276  | \$75,891     | \$182,279     |

<sup>1</sup> 5- and 10-year totals are straight averages

**Table B3. With-Waiver Summary of Enrollment, Premium, and Cost Estimates, PY 2024-2033**

| With Waiver - Scenario B                      | 2024      | 2025      | 2026      | 2027      | 2028      | 2029      | 2030      | 2031      | 2032      | 2033      | 5-Year Total | 10-Year Total |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---------------|
| <b>Unsubsidized On/Off-Exchange</b>           |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 66,122    | 64,780    | 63,298    | 61,282    | 59,355    | 57,513    | 55,754    | 54,075    | 52,471    | 50,941    | 62,967       | 58,559        |
| Average Premium PMPM                          | \$802     | \$843     | \$886     | \$931     | \$978     | \$1,027   | \$1,079   | \$1,133   | \$1,189   | \$1,249   | \$886        | \$1,000       |
| <b>Subsidized On-Exchange</b>                 |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 186,174   | 170,243   | 172,199   | 173,370   | 174,549   | 175,736   | 176,932   | 178,135   | 179,347   | 180,567   | 175,307      | 176,725       |
| Average Premium PMPM                          | \$761     | \$801     | \$842     | \$886     | \$932     | \$981     | \$1,032   | \$1,085   | \$1,142   | \$1,201   | \$844        | \$967         |
| Average APTC PMPM                             | \$316     | \$345     | \$378     | \$412     | \$449     | \$487     | \$529     | \$572     | \$618     | \$667     | \$379        | \$478         |
| <b>Total Individual Market</b>                |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 252,296   | 235,023   | 235,497   | 234,652   | 233,904   | 233,249   | 232,686   | 232,210   | 231,818   | 231,508   | 238,275      | 235,284       |
| Average Premium PMPM                          | \$772     | \$812     | \$854     | \$898     | \$944     | \$992     | \$1,043   | \$1,096   | \$1,153   | \$1,212   | \$855        | \$975         |
| Aggregate Premiums (millions)                 | \$2,336   | \$2,291   | \$2,414   | \$2,528   | \$2,649   | \$2,777   | \$2,912   | \$3,055   | \$3,206   | \$3,366   | \$12,219     | \$27,537      |
| Projected Federal Spend (millions)            | \$659     | \$658     | \$728     | \$800     | \$877     | \$959     | \$1,048   | \$1,142   | \$1,242   | \$1,349   | \$3,722      | \$9,462       |
| <b>Essential Plan</b>                         |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 1,432,703 | 1,410,434 | 1,413,037 | 1,434,488 | 1,456,301 | 1,478,460 | 1,500,970 | 1,523,838 | 1,547,069 | 1,570,669 | 1,429,393    | 1,476,797     |
| Average Premium PMPM                          | \$629     | \$655     | \$678     | \$703     | \$728     | \$755     | \$783     | \$812     | \$841     | \$873     | \$679        | \$748         |
| Aggregate Premiums (millions)                 | \$10,818  | \$11,079  | \$11,495  | \$12,094  | \$12,726  | \$13,393  | \$14,097  | \$14,839  | \$15,622  | \$16,448  | \$58,211     | \$132,611     |
| IRIP Payment (millions)                       | \$45      | \$63      | \$66      | \$69      | \$72      | \$76      | \$80      | \$83      | \$88      | \$92      | \$315        | \$733         |
| Quality Incentive Pool Costs (millions)       | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$1,125      | \$2,250       |
| LTSS Coverage (millions)                      | \$0       | \$131     | \$136     | \$143     | \$150     | \$158     | \$167     | \$175     | \$185     | \$194     | \$560        | \$1,440       |
| SDoH/BH Grant Program (millions)              | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$125        | \$250         |
| Total Program Costs (millions)                | \$11,112  | \$11,522  | \$11,946  | \$12,556  | \$13,199  | \$13,877  | \$14,593  | \$15,348  | \$16,145  | \$16,985  | \$60,336     | \$137,284     |
| Projected Federal Spend (millions)            | \$3,207   | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$3,207      | \$3,207       |
| <b>Employer Shared Responsibility Revenue</b> |           |           |           |           |           |           |           |           |           |           |              |               |
| Projected Federal Revenue (millions)          | (\$1)     | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | (\$1)        | (\$1)         |
| <b>Combined Totals</b>                        |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                       | 1,684,999 | 1,645,457 | 1,648,534 | 1,669,140 | 1,690,205 | 1,711,709 | 1,733,656 | 1,756,049 | 1,778,887 | 1,802,178 | 1,667,667    | 1,712,081     |
| Projected Federal Spend (millions)            | \$3,866   | \$658     | \$728     | \$800     | \$877     | \$959     | \$1,048   | \$1,142   | \$1,242   | \$1,349   | \$6,929      | \$12,669      |

<sup>1</sup> 5- and 10-year totals are straight averages. 2024 enrollment, premium, and APTC amounts reflect the average monthly enrollment for the 12-month period. 2024 amounts in other With Waiver enrollment tables reflect a 9-month average after waiver implementation.

Note: The program investments for Quality Incentive Pool and SDoH/BH Grant Program for 2024 are displayed as total costs over all 12 months. The first 3 months of these amounts would be incurred under the BHP and the last 9 months would be incurred under the 1332 Waiver.

**Table B3. With-Waiver PY 2024 Break-Out**

|   | 200-250% FPL   | All Other FPL | 200-250% FPL    | All Other FPL |
|---|----------------|---------------|-----------------|---------------|
| <b>With Waiver - Scenario B</b>         | 1/1/24-3/31/24 |               | 4/1/24-12/31/24 |               |
| <b>Unsubsidized On/Off-Exchange</b>     |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 66,122        | 0               | 66,122        |
| Average Premium PMPM                    | \$0            | \$802         | \$0             | \$802         |
| <b>Subsidized On-Exchange</b>           |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 168,922       | 410             | 168,512       |
| Average Premium PMPM                    | \$756          | \$761         | \$756           | \$761         |
| Average APTC PMPM                       | \$332          | \$314         | \$332           | \$314         |
| <b>Total Individual Market</b>          |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 235,044       | 410             | 234,634       |
| Average Premium PMPM                    | \$756          | \$773         | \$756           | \$773         |
| Aggregate Premiums (millions)           | \$156          | \$545         | \$3             | \$1,632       |
| Projected Federal Spend (millions)      | \$64           | \$149         | \$1             | \$445         |
| <b>Essential Plan</b>                   |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 1,365,381     | 89,763          | 1,365,381     |
| Average Premium PMPM                    | \$0            | \$625         | \$718           | \$625         |
| Aggregate Premiums (millions)           | \$0            | \$2,559       | \$580           | \$7,678       |
| IRIP Payment (millions)                 |                | \$0           |                 | \$45          |
| Quality Incentive Pool Costs (millions) |                | \$56          |                 | \$169         |
| LTSS Coverage (millions)                |                | \$0           |                 | \$0           |
| SDoH/BH Grant Program (millions)        |                | \$6           |                 | \$19          |
| Total Program Costs (millions)          |                | \$2,778       |                 | \$8,334       |
| Projected Federal Spend (millions)      |                | \$802         |                 | \$2,405       |

**Table B4. Baseline Without and With-Waiver Annual Funding Estimates, PY 2024-2033**

| Scenario B                                    | 2024                    | 2025                     | 2026                    | 2027                    | 2028                    | 2029                    | 2030                    | 2031                    | 2032                    | 2033                    |
|---|-------------------------|--------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| <b>Individual Market</b>                      |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver PTCs                           | \$832,994,392           | \$918,399,798            | \$1,012,775,685         | \$1,116,643,747         | \$1,228,303,323         | \$1,348,291,655         | \$1,477,182,068         | \$1,615,586,375         | \$1,764,157,453         | \$1,923,591,985         |
| With Waiver PTCs                              | \$658,913,296           | \$657,880,975            | \$728,170,345           | \$800,128,828           | \$877,122,565           | \$959,470,503           | \$1,047,511,038         | \$1,141,603,175         | \$1,242,127,769         | \$1,349,488,831         |
| Difference                                    | \$174,081,096           | \$260,518,823            | \$284,605,340           | \$316,514,919           | \$351,180,758           | \$388,821,152           | \$429,671,030           | \$473,983,199           | \$522,029,684           | \$574,103,154           |
| <b>Essential Plan</b>                         |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver BHP Funding                    | \$12,829,257,312        | \$12,923,855,551         | \$14,026,334,661        | \$14,992,400,354        | \$16,025,262,078        | \$17,129,280,681        | \$18,309,357,764        | \$19,570,733,177        | \$20,919,007,758        | \$22,360,168,196        |
| With Waiver BHP Funding                       | \$3,207,314,328         | \$0                      | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     |
| Difference                                    | \$9,621,942,984         | \$12,923,855,551         | \$14,026,334,661        | \$14,992,400,354        | \$16,025,262,078        | \$17,129,280,681        | \$18,309,357,764        | \$19,570,733,177        | \$20,919,007,758        | \$22,360,168,196        |
| <b>Employer Shared Responsibility Revenue</b> |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Employer Penalty Loss                         | (\$2,592,000)           | (\$2,970,000)            | (\$3,006,000)           | (\$3,258,000)           | (\$3,746,700)           | (\$4,308,705)           | (\$4,955,011)           | (\$5,698,262)           | (\$6,553,002)           | (\$7,535,952)           |
| <b>Combined Totals</b>                        |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver Federal Spend                  | \$13,659,659,705        | \$13,839,285,349         | \$15,036,104,346        | \$16,105,786,101        | \$17,249,818,701        | \$18,473,263,631        | \$19,781,584,821        | \$21,180,621,290        | \$22,676,612,209        | \$24,276,224,229        |
| With Waiver Federal Spend                     | \$3,866,227,625         | \$657,880,975            | \$728,170,345           | \$800,128,828           | \$877,122,565           | \$959,470,503           | \$1,047,511,038         | \$1,141,603,175         | \$1,242,127,769         | \$1,349,488,831         |
| <b>Total Federal Savings</b>                  | <b>\$9,793,432,080</b>  | <b>\$13,181,404,374</b>  | <b>\$14,307,934,001</b> | <b>\$15,305,657,273</b> | <b>\$16,372,696,136</b> | <b>\$17,513,793,128</b> | <b>\$18,734,073,783</b> | <b>\$20,039,018,115</b> | <b>\$21,434,484,440</b> | <b>\$22,926,735,398</b> |
| Requested Pass-through                        | \$9,793,432,080         | \$13,181,404,374         | \$14,307,934,001        | \$15,305,657,273        | \$16,372,696,136        | \$17,513,793,128        | \$18,734,073,783        | \$20,039,018,115        | \$21,434,484,440        | \$22,926,735,398        |
| <b>Net Federal Savings</b>                    | <b>\$0</b>              | <b>\$0</b>               | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              | <b>\$0</b>              |
| <b>Combined Totals</b>                        |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
|   | <b>5-Year Total</b>     | <b>10-Year Total</b>     |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver Federal Spend                  | \$75,890,654,201        | \$182,278,960,380        |                         |                         |                         |                         |                         |                         |                         |                         |
| With Waiver Federal Spend                     | \$6,929,530,337         | \$12,669,731,653         |                         |                         |                         |                         |                         |                         |                         |                         |
| <b>Total Federal Savings</b>                  | <b>\$68,961,123,865</b> | <b>\$169,609,228,728</b> |                         |                         |                         |                         |                         |                         |                         |                         |
| Requested Pass-through                        | \$68,961,123,865        | \$169,609,228,728        |                         |                         |                         |                         |                         |                         |                         |                         |
| <b>Net Federal Savings</b>                    | <b>\$0</b>              | <b>\$0</b>               |                         |                         |                         |                         |                         |                         |                         |                         |

Note: for 2024 due to the April 1 implementation date, there will still be 1 quarter of BHP funding compared to the other years of the Waiver.

**Table B5. SLCSP Premium Without and With-Waiver by Rating Area, PY 2024 – 2033**

| <b>Baseline - Scenario B</b>                                    | 2024  | 2025  | 2026  | 2027  | 2028  | 2029    | 2030    | 2031    | 2032    | 2033    |
|---|-------|-------|-------|-------|-------|---------|---------|---------|---------|---------|
| <i>Second Lowest Cost Silver Plans (SLCSP) Monthly Premiums</i> |       |       |       |       |       |         |         |         |         |         |
| Rating Area 1   | \$599 | \$630 | \$662 | \$697 | \$733 | \$771   | \$811   | \$853   | \$898   | \$945   |
| Rating Area 2   | \$512 | \$539 | \$567 | \$596 | \$627 | \$660   | \$694   | \$731   | \$769   | \$808   |
| Rating Area 3   | \$744 | \$782 | \$823 | \$866 | \$911 | \$958   | \$1,008 | \$1,061 | \$1,116 | \$1,174 |
| Rating Area 4   | \$808 | \$850 | \$894 | \$941 | \$990 | \$1,041 | \$1,095 | \$1,152 | \$1,212 | \$1,275 |
| Rating Area 5   | \$600 | \$631 | \$664 | \$699 | \$735 | \$773   | \$813   | \$856   | \$900   | \$947   |
| Rating Area 6   | \$617 | \$649 | \$683 | \$718 | \$756 | \$795   | \$836   | \$880   | \$926   | \$974   |
| Rating Area 7   | \$612 | \$644 | \$677 | \$712 | \$749 | \$788   | \$829   | \$872   | \$918   | \$965   |
| Rating Area 8   | \$775 | \$815 | \$857 | \$902 | \$949 | \$998   | \$1,050 | \$1,105 | \$1,162 | \$1,222 |
| <b>With Waiver - Scenario B</b>                                 | 2024  | 2025  | 2026  | 2027  | 2028  | 2029    | 2030    | 2031    | 2032    | 2033    |
| <i>Second Lowest Cost Silver Plans (SLCSP) Monthly Premiums</i> |       |       |       |       |       |         |         |         |         |         |
| Rating Area 1   | \$599 | \$630 | \$663 | \$697 | \$733 | \$772   | \$812   | \$854   | \$898   | \$945   |
| Rating Area 2   | \$512 | \$539 | \$567 | \$597 | \$628 | \$660   | \$695   | \$731   | \$769   | \$809   |
| Rating Area 3   | \$744 | \$783 | \$824 | \$866 | \$911 | \$959   | \$1,009 | \$1,061 | \$1,116 | \$1,174 |
| Rating Area 4   | \$808 | \$850 | \$895 | \$941 | \$990 | \$1,042 | \$1,096 | \$1,153 | \$1,213 | \$1,276 |
| Rating Area 5   | \$600 | \$632 | \$664 | \$699 | \$735 | \$774   | \$814   | \$856   | \$901   | \$948   |
| Rating Area 6   | \$617 | \$649 | \$683 | \$719 | \$756 | \$795   | \$837   | \$880   | \$926   | \$974   |
| Rating Area 7   | \$612 | \$644 | \$677 | \$713 | \$750 | \$789   | \$830   | \$873   | \$918   | \$966   |
| Rating Area 8   | \$775 | \$815 | \$858 | \$902 | \$949 | \$999   | \$1,051 | \$1,105 | \$1,163 | \$1,223 |

**Table B6. Baseline Without Average Annual Enrollment by Metal Level, PY 2024 – 2033**

| <b>Baseline - Scenario B</b>                   | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,668,073</b> | <b>1,609,554</b> | <b>1,619,155</b> | <b>1,640,369</b> | <b>1,662,067</b> | <b>1,684,232</b> | <b>1,706,864</b> | <b>1,729,969</b> | <b>1,753,548</b> | <b>1,777,606</b> |
| <i>Unsubsidized On/Off-Exchange Enrollment</i> | 66,122           | 64,435           | 62,609           | 60,248           | 57,976           | 55,790           | 53,686           | 51,662           | 49,714           | 47,839           |
| Catastrophic                                   | 5,073            | 5,025            | 4,981            | 4,924            | 4,871            | 4,822            | 4,776            | 4,733            | 4,694            | 4,657            |
| Bronze   | 21,026           | 20,462           | 19,850           | 19,057           | 18,295           | 17,560           | 16,853           | 16,171           | 15,515           | 14,884           |
| Silver   | 21,525           | 20,941           | 20,307           | 19,485           | 18,695           | 17,933           | 17,200           | 16,493           | 15,813           | 15,158           |
| Gold   | 10,038           | 9,771            | 9,480            | 9,105            | 8,743            | 8,395            | 8,059            | 7,736            | 7,425            | 7,126            |
| Platinum                                       | 8,461            | 8,236            | 7,992            | 7,677            | 7,373            | 7,080            | 6,799            | 6,528            | 6,267            | 6,015            |
| <i>Subsidized On-Exchange Enrollment</i>       | 236,570          | 237,659          | 239,503          | 241,952          | 244,435          | 246,953          | 249,506          | 252,095          | 254,721          | 257,385          |
| Catastrophic                                   | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Bronze   | 88,312           | 88,718           | 89,407           | 90,321           | 91,248           | 92,187           | 93,141           | 94,107           | 95,088           | 96,082           |
| Silver   | 96,331           | 96,774           | 97,525           | 98,522           | 99,533           | 100,559          | 101,598          | 102,653          | 103,722          | 104,807          |
| Gold   | 30,993           | 31,136           | 31,378           | 31,698           | 32,024           | 32,353           | 32,688           | 33,027           | 33,371           | 33,720           |
| Platinum                                       | 20,934           | 21,030           | 21,194           | 21,410           | 21,630           | 21,853           | 22,079           | 22,308           | 22,540           | 22,776           |
| <b>Essential Plan Enrollment</b>               | <b>1,365,381</b> | <b>1,307,461</b> | <b>1,317,042</b> | <b>1,338,169</b> | <b>1,359,656</b> | <b>1,381,489</b> | <b>1,403,672</b> | <b>1,426,211</b> | <b>1,449,113</b> | <b>1,472,382</b> |
| EP1  | 573,460          | 549,133          | 553,158          | 562,031          | 571,056          | 580,225          | 589,542          | 599,009          | 608,627          | 618,400          |
| EP2  | 163,846          | 156,895          | 158,045          | 160,580          | 163,159          | 165,779          | 168,441          | 171,145          | 173,894          | 176,686          |
| EP3  | 95,577           | 91,522           | 92,193           | 93,672           | 95,176           | 96,704           | 98,257           | 99,835           | 101,438          | 103,067          |
| EP4  | 532,498          | 509,910          | 513,646          | 521,886          | 530,266          | 538,781          | 547,432          | 556,222          | 565,154          | 574,229          |



**Table B7. With-Waiver Average Annual Enrollment by Metal Level, PY 2024 – 2033**

| <b>With Waiver - Scenario B</b>                | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,690,188</b> | <b>1,645,457</b> | <b>1,648,534</b> | <b>1,669,140</b> | <b>1,690,205</b> | <b>1,711,709</b> | <b>1,733,656</b> | <b>1,756,049</b> | <b>1,778,887</b> | <b>1,802,178</b> |
| <b>Unsubsidized On/Off-Exchange Enrollment</b> | <b>66,122</b>    | <b>64,780</b>    | <b>63,298</b>    | <b>61,282</b>    | <b>59,355</b>    | <b>57,513</b>    | <b>55,754</b>    | <b>54,075</b>    | <b>52,471</b>    | <b>50,941</b>    |
| Catastrophic                                   | 5,073            | 5,052            | 5,036            | 5,009            | 4,987            | 4,971            | 4,960            | 4,954            | 4,954            | 4,959            |
| Bronze   | 21,026           | 20,572           | 20,068           | 19,384           | 18,730           | 18,102           | 17,502           | 16,927           | 16,376           | 15,849           |
| Silver   | 21,525           | 21,053           | 20,530           | 19,820           | 19,139           | 18,487           | 17,862           | 17,264           | 16,690           | 16,140           |
| Gold   | 10,038           | 9,823            | 9,585            | 9,261            | 8,951            | 8,654            | 8,370            | 8,098            | 7,837            | 7,588            |
| Platinum                                       | 8,461            | 8,280            | 8,080            | 7,808            | 7,548            | 7,299            | 7,061            | 6,833            | 6,614            | 6,405            |
| <b>Subsidized On-Exchange Enrollment</b>       | <b>168,922</b>   | <b>170,243</b>   | <b>172,199</b>   | <b>173,370</b>   | <b>174,549</b>   | <b>175,736</b>   | <b>176,932</b>   | <b>178,135</b>   | <b>179,347</b>   | <b>180,567</b>   |
| Catastrophic                                   | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Bronze   | 63,059           | 63,552           | 64,282           | 64,719           | 65,159           | 65,602           | 66,049           | 66,498           | 66,950           | 67,406           |
| Silver   | 68,785           | 69,323           | 70,119           | 70,596           | 71,076           | 71,560           | 72,046           | 72,536           | 73,030           | 73,527           |
| Gold   | 22,131           | 22,304           | 22,560           | 22,713           | 22,868           | 23,023           | 23,180           | 23,338           | 23,496           | 23,656           |
| Platinum                                       | 14,948           | 15,065           | 15,238           | 15,342           | 15,446           | 15,551           | 15,657           | 15,763           | 15,870           | 15,978           |
| <b>Essential Plan Enrollment</b>               | <b>1,455,144</b> | <b>1,410,434</b> | <b>1,413,037</b> | <b>1,434,488</b> | <b>1,456,301</b> | <b>1,478,460</b> | <b>1,500,970</b> | <b>1,523,838</b> | <b>1,547,069</b> | <b>1,570,669</b> |
| EP1  | 573,460          | 549,133          | 553,158          | 562,031          | 571,056          | 580,225          | 589,542          | 599,009          | 608,627          | 618,400          |
| EP2  | 163,846          | 156,895          | 158,045          | 160,580          | 163,159          | 165,779          | 168,441          | 171,145          | 173,894          | 176,686          |
| EP3  | 95,577           | 91,522           | 92,193           | 93,672           | 95,176           | 96,704           | 98,257           | 99,835           | 101,438          | 103,067          |
| EP4  | 532,498          | 509,910          | 513,646          | 521,886          | 530,266          | 538,781          | 547,432          | 556,222          | 565,154          | 574,229          |
| QHP 200%-250% FPL Population                   | 89,763           | 102,973          | 95,995           | 96,319           | 96,645           | 96,971           | 97,298           | 97,627           | 97,957           | 98,288           |

Note: This table displays the With Waiver amounts as 9-month averages for 2024, since the first year of the waiver will only contain 9 months. There is an increase from the WoW scenario (~0.6% in total) for the on-exchange Unsubsidized and Subsidized population with incomes above 250% of the FPL. This is due to increased awareness, concentrated advertisement, and outreach activities with the implementation of the waiver.

**Table B8. Baseline Without-Waiver Average Annual Enrollment by FPL, PY 2024 – 2033**

| <b>Baseline - Scenario B</b>                   | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,668,073</b> | <b>1,609,554</b> | <b>1,619,155</b> | <b>1,640,369</b> | <b>1,662,067</b> | <b>1,684,232</b> | <b>1,706,864</b> | <b>1,729,969</b> | <b>1,753,548</b> | <b>1,777,606</b> |
| <b>Unsubsidized On/Off-Exchange Enrollment</b> | <b>66,122</b>    | <b>64,435</b>    | <b>62,609</b>    | <b>60,248</b>    | <b>57,976</b>    | <b>55,790</b>    | <b>53,686</b>    | <b>51,662</b>    | <b>49,714</b>    | <b>47,839</b>    |
| Below 400%                                     | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 401% - 500%                                    | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 501% - 600%                                    | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Over 600%                                      | 7,685            | 7,755            | 7,824            | 7,529            | 7,245            | 6,972            | 6,709            | 6,456            | 6,213            | 5,979            |
| Do Not Report                                  | 58,437           | 56,680           | 54,785           | 52,719           | 50,731           | 48,818           | 46,977           | 45,206           | 43,501           | 41,861           |
| <b>Subsidized On-Exchange Enrollment</b>       | <b>236,570</b>   | <b>237,659</b>   | <b>239,503</b>   | <b>241,952</b>   | <b>244,435</b>   | <b>246,953</b>   | <b>249,506</b>   | <b>252,095</b>   | <b>254,721</b>   | <b>257,385</b>   |
| Below 139%                                     | 7,523            | 7,558            | 7,617            | 7,694            | 7,773            | 7,853            | 7,935            | 8,017            | 8,101            | 8,185            |
| 139% - 150%                                    | 288              | 290              | 292              | 295              | 298              | 301              | 304              | 307              | 310              | 314              |
| 151% - 200%                                    | 1,757            | 1,765            | 1,779            | 1,797            | 1,816            | 1,834            | 1,853            | 1,873            | 1,892            | 1,912            |
| 201% - 250%                                    | 69,010           | 69,122           | 69,500           | 69,870           | 70,241           | 70,615           | 70,990           | 71,368           | 71,748           | 72,129           |
| 251% - 300%                                    | 54,227           | 54,547           | 55,024           | 55,704           | 56,394           | 57,095           | 57,807           | 58,530           | 59,265           | 60,011           |
| 301% - 350%                                    | 40,022           | 40,258           | 40,610           | 41,112           | 41,621           | 42,139           | 42,664           | 43,198           | 43,740           | 44,291           |
| 351% - 400%                                    | 26,047           | 26,201           | 26,430           | 26,756           | 27,088           | 27,425           | 27,767           | 28,114           | 28,467           | 28,825           |
| 401% - 500%                                    | 21,502           | 21,629           | 21,818           | 22,088           | 22,362           | 22,640           | 22,922           | 23,209           | 23,500           | 23,796           |
| 501% - 600%                                    | 9,595            | 9,652            | 9,736            | 9,856            | 9,978            | 10,102           | 10,228           | 10,356           | 10,486           | 10,618           |
| Over 600%                                      | 6,599            | 6,638            | 6,696            | 6,779            | 6,863            | 6,948            | 7,035            | 7,123            | 7,213            | 7,303            |
| <b>Essential Plan Enrollment</b>               | <b>1,365,381</b> | <b>1,307,461</b> | <b>1,317,042</b> | <b>1,338,169</b> | <b>1,359,656</b> | <b>1,381,489</b> | <b>1,403,672</b> | <b>1,426,211</b> | <b>1,449,113</b> | <b>1,472,382</b> |
| Below 150%                                     | 442,298          | 444,312          | 453,719          | 462,398          | 471,247          | 480,267          | 489,462          | 498,834          | 508,388          | 518,126          |
| Over 151%                                      | 923,082          | 863,149          | 863,323          | 875,770          | 888,409          | 901,221          | 914,210          | 927,377          | 940,725          | 954,255          |

**Table B9. With-Waiver PY Average Annual Enrollment by FPL, PY 2024 – 2033**

| <b>With Waiver - Scenario B</b>                | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,690,188</b> | <b>1,645,457</b> | <b>1,648,534</b> | <b>1,669,140</b> | <b>1,690,205</b> | <b>1,711,709</b> | <b>1,733,656</b> | <b>1,756,049</b> | <b>1,778,887</b> | <b>1,802,178</b> |
| <b>Unsubsidized On/Off-Exchange Enrollment</b> | <b>66,122</b>    | <b>64,780</b>    | <b>63,298</b>    | <b>61,282</b>    | <b>59,355</b>    | <b>57,513</b>    | <b>55,754</b>    | <b>54,075</b>    | <b>52,471</b>    | <b>50,941</b>    |
| Below 400% <sup>2</sup>                        | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 401% - 500% <sup>2</sup>                       | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 501% - 600% <sup>2</sup>                       | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Over 600% <sup>2</sup>                         | 7,736            | 7,823            | 7,910            | 7,658            | 7,418            | 7,187            | 6,968            | 6,758            | 6,557            | 6,366            |
| Do Not Report <sup>2</sup>                     | 58,386           | 56,957           | 55,388           | 53,624           | 51,937           | 50,326           | 48,786           | 47,317           | 45,914           | 44,575           |
| <b>Subsidized On-Exchange Enrollment</b>       | <b>168,922</b>   | <b>170,243</b>   | <b>172,199</b>   | <b>173,370</b>   | <b>174,549</b>   | <b>175,736</b>   | <b>176,932</b>   | <b>178,135</b>   | <b>179,347</b>   | <b>180,567</b>   |
| Below 139% <sup>1</sup>                        | 7,490            | 7,548            | 7,635            | 7,687            | 7,739            | 7,792            | 7,845            | 7,898            | 7,952            | 8,006            |
| 139% - 150% <sup>1</sup>                       | 287              | 289              | 293              | 295              | 297              | 299              | 301              | 303              | 305              | 307              |
| 151% - 200% <sup>1</sup>                       | 1,750            | 1,763            | 1,783            | 1,796            | 1,808            | 1,820            | 1,832            | 1,845            | 1,857            | 1,870            |
| 201% - 250%                                    | 410              | 413              | 418              | 420              | 423              | 426              | 429              | 432              | 435              | 438              |
| 251% - 300% <sup>2</sup>                       | 54,568           | 54,995           | 55,627           | 56,005           | 56,386           | 56,769           | 57,155           | 57,544           | 57,936           | 58,330           |
| 301% - 350% <sup>2</sup>                       | 40,274           | 40,589           | 41,055           | 41,334           | 41,615           | 41,898           | 42,183           | 42,470           | 42,759           | 43,050           |
| 351% - 400% <sup>2</sup>                       | 26,211           | 26,416           | 26,719           | 26,901           | 27,084           | 27,268           | 27,454           | 27,640           | 27,828           | 28,018           |
| 401% - 500% <sup>2</sup>                       | 21,637           | 21,807           | 22,057           | 22,207           | 22,358           | 22,510           | 22,663           | 22,818           | 22,973           | 23,129           |
| 501% - 600% <sup>2</sup>                       | 9,655            | 9,731            | 9,843            | 9,910            | 9,977            | 10,045           | 10,113           | 10,182           | 10,251           | 10,321           |
| Over 600% <sup>2</sup>                         | 6,641            | 6,693            | 6,770            | 6,816            | 6,862            | 6,909            | 6,956            | 7,003            | 7,051            | 7,099            |
| <b>Essential Plan Enrollment</b>               | <b>1,455,144</b> | <b>1,410,434</b> | <b>1,413,037</b> | <b>1,434,488</b> | <b>1,456,301</b> | <b>1,478,460</b> | <b>1,500,970</b> | <b>1,523,838</b> | <b>1,547,069</b> | <b>1,570,669</b> |
| Below 150%                                     | 791,921          | 758,327          | 763,884          | 776,138          | 788,601          | 801,264          | 814,130          | 827,203          | 840,485          | 853,981          |
| 151% - 200%                                    | 573,460          | 549,133          | 553,158          | 562,031          | 571,056          | 580,225          | 589,542          | 599,009          | 608,627          | 618,400          |
| Over 201%                                      | 89,763           | 102,973          | 95,995           | 96,319           | 96,645           | 96,971           | 97,298           | 97,627           | 97,957           | 98,288           |

<sup>1</sup> The decrease in enrollment from the WoW scenario (~0.4% in total) is due to the methodology for allocating estimated enrollment by income and does not reflect any changes in eligibility for this population that would cause consumers below 200% of FPL to lose coverage.

<sup>2</sup> There is an increase from the WoW scenario (~0.6% in total) for the on-exchange Unsubsidized and Subsidized population with incomes above 250% of the FPL. This is due to increased awareness, concentrated advertisement, and outreach activities with the implementation of the waiver.

Note: This table displays the With Waiver amounts as 9-month averages for 2024, since the first year of the waiver will only contain 9 months.

**Table B10. Without and With-Waiver Monthly Federal Funding PMPM by Metal Level and Rate Cohort**

| <b>Without Waiver - Scenario B</b> | 2024         | 2025         | 2026         | 2027         | 2028         | 2029           | 2030           | 2031           | 2032           | 2033           |
|------------------------------------|--------------|--------------|--------------|--------------|--------------|----------------|----------------|----------------|----------------|----------------|
| <i>Exchange Subsidized APTCs</i>   | \$314        | \$345        | \$378        | \$412        | \$449        | \$487          | \$529          | \$572          | \$618          | \$667          |
| Bronze                             | \$289        | \$313        | \$339        | \$366        | \$395        | \$425          | \$457          | \$491          | \$528          | \$566          |
| Silver                             | \$365        | \$398        | \$432        | \$469        | \$507        | \$548          | \$591          | \$637          | \$686          | \$737          |
| Gold                               | \$281        | \$317        | \$356        | \$397        | \$441        | \$488          | \$538          | \$590          | \$646          | \$706          |
| Platinum                           | \$237        | \$278        | \$322        | \$368        | \$418        | \$471          | \$527          | \$586          | \$650          | \$717          |
| <b>Essential Plan BHP Funding</b>  | <b>\$783</b> | <b>\$824</b> | <b>\$887</b> | <b>\$934</b> | <b>\$982</b> | <b>\$1,033</b> | <b>\$1,087</b> | <b>\$1,144</b> | <b>\$1,203</b> | <b>\$1,266</b> |
| EP1                                | \$704        | \$741        | \$798        | \$840        | \$883        | \$929          | \$977          | \$1,028        | \$1,082        | \$1,138        |
| EP2                                | \$771        | \$811        | \$874        | \$920        | \$967        | \$1,018        | \$1,071        | \$1,126        | \$1,185        | \$1,246        |
| EP3                                | \$835        | \$878        | \$946        | \$995        | \$1,047      | \$1,102        | \$1,159        | \$1,219        | \$1,282        | \$1,349        |
| EP4                                | \$862        | \$907        | \$977        | \$1,028      | \$1,082      | \$1,138        | \$1,197        | \$1,259        | \$1,325        | \$1,394        |
| <b>With Waiver - Scenario B</b>    | 2024         | 2025         | 2026         | 2027         | 2028         | 2029           | 2030           | 2031           | 2032           | 2033           |
| <i>Exchange Subsidized APTCs</i>   | \$314        | \$345        | \$378        | \$412        | \$449        | \$487          | \$529          | \$572          | \$618          | \$667          |
| Bronze                             | \$289        | \$313        | \$339        | \$366        | \$395        | \$425          | \$457          | \$491          | \$528          | \$566          |
| Silver                             | \$365        | \$398        | \$432        | \$469        | \$507        | \$548          | \$591          | \$637          | \$686          | \$737          |
| Gold                               | \$281        | \$317        | \$356        | \$397        | \$441        | \$488          | \$538          | \$590          | \$646          | \$706          |
| Platinum                           | \$237        | \$278        | \$322        | \$368        | \$418        | \$471          | \$527          | \$586          | \$650          | \$717          |
| <b>Essential Plan BHP Funding</b>  | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>     | <b>\$0</b>     | <b>\$0</b>     | <b>\$0</b>     | <b>\$0</b>     |
| EP1                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            | \$0            |
| EP2                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            | \$0            |
| EP3                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            | \$0            |
| EP4                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            | \$0            |
| QHP 200%-250% FPL Population       | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            | \$0            |

**Table B11. Without and With Waiver - 5-Year Enrollment, Premium, and Federal Deficit Estimates, PY 2024 – 2033**

| <b>Without Waiver - Scenario B</b>   | <b>2024</b> | <b>2025</b> | <b>2026</b> | <b>2027</b> | <b>2028</b> | <b>2029</b> | <b>2030</b> | <b>2031</b> | <b>2032</b> | <b>2033</b> |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <i>Unsubsidized On-exchange &amp; Off-exchange Enrollment</i>                | 66,122      | 64,435      | 62,609      | 60,248      | 57,976      | 55,790      | 53,686      | 51,662      | 49,714      | 47,839      |
| Below 400%   | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| 401% - 500%  | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| 501% - 600%  | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| Over 600%  | 7,685       | 7,755       | 7,824       | 7,529       | 7,245       | 6,972       | 6,709       | 6,456       | 6,213       | 5,979       |
| Do Not Report  | 58,437      | 56,680      | 54,785      | 52,719      | 50,731      | 48,818      | 46,977      | 45,206      | 43,501      | 41,861      |
| <i>Unsubsidized On-exchange Enrollment</i>                                   | 16,531      | 16,109      | 15,652      | 15,062      | 14,494      | 13,948      | 13,422      | 12,915      | 12,428      | 11,960      |
| <i>Off-exchange Enrollment</i>   | 49,592      | 48,326      | 46,957      | 45,186      | 43,482      | 41,843      | 40,265      | 38,746      | 37,285      | 35,879      |
| <b>With Waiver - Scenario B</b>  | <b>2024</b> | <b>2025</b> | <b>2026</b> | <b>2027</b> | <b>2028</b> | <b>2029</b> | <b>2030</b> | <b>2031</b> | <b>2032</b> | <b>2033</b> |
| <i>Unsubsidized On-exchange &amp; Off-exchange Enrollment</i>                | 66,122      | 64,780      | 63,298      | 61,282      | 59,355      | 57,513      | 55,754      | 54,075      | 52,471      | 50,941      |
| Below 400%   | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| 401% - 500%  | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| 501% - 600%  | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| Over 600%  | 7,736       | 7,823       | 7,910       | 7,658       | 7,418       | 7,187       | 6,968       | 6,758       | 6,557       | 6,366       |
| Do Not Report  | 58,386      | 56,957      | 55,388      | 53,624      | 51,937      | 50,326      | 48,786      | 47,317      | 45,914      | 44,575      |
| <i>Unsubsidized On-exchange &amp; Off-exchange Premium Increase (Annual)</i> | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |
| <i>Unsubsidized On-exchange Enrollment</i>                                   | 16,531      | 16,195      | 15,825      | 15,321      | 14,839      | 14,378      | 13,939      | 13,519      | 13,118      | 12,735      |
| <i>Unsubsidized On-exchange Premium Increase (Annual)</i>                    | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |
| <i>Off-exchange Enrollment</i>   | 49,592      | 48,585      | 47,474      | 45,962      | 44,516      | 43,135      | 41,816      | 40,556      | 39,353      | 38,206      |
| <i>Off-exchange Premium Increase (Annual)</i>                                | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |

Note: Due to IRIP, there are no expected increases of premiums for consumers that remain in the individual market compared to Without Waiver.

Note: There is an increase from the WoW scenario (~0.6% in total) for the on-exchange Unsubsidized and Subsidized population with incomes above 250% of the FPL. This is due to increased awareness, concentrated advertisement, and outreach activities with the implementation of the Waiver.

**Table B12. Without and With-Waiver Annual Out-of-Pocket Expenses by FPL, PY 2024 – 2033**

| <b>Without Waiver - Scenario B - FPL</b>                    | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | 2032    | 2033    | 5 Year  | 10 Year |
|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| <i>Exchange - Annual Out-of-Pocket Expenses - FPL</i>       |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 250%  | \$2,751 | \$2,895 | \$3,043 | \$3,199 | \$3,363 | \$3,535 | \$3,716 | \$3,906 | \$4,106 | \$4,317 | \$3,052 | \$3,491 |
| 251% - 300%   | \$2,643 | \$2,781 | \$2,924 | \$3,073 | \$3,230 | \$3,396 | \$3,570 | \$3,753 | \$3,945 | \$4,147 | \$2,933 | \$3,362 |
| 301% - 350%   | \$2,641 | \$2,778 | \$2,921 | \$3,070 | \$3,227 | \$3,392 | \$3,566 | \$3,749 | \$3,941 | \$4,143 | \$2,930 | \$3,359 |
| 351% - 400%   | \$2,653 | \$2,791 | \$2,934 | \$3,085 | \$3,243 | \$3,409 | \$3,583 | \$3,767 | \$3,960 | \$4,163 | \$2,944 | \$3,375 |
| 401% - 500%   | \$2,672 | \$2,811 | \$2,955 | \$3,106 | \$3,265 | \$3,432 | \$3,608 | \$3,793 | \$3,987 | \$4,192 | \$2,965 | \$3,398 |
| 501% - 600%   | \$2,686 | \$2,826 | \$2,971 | \$3,123 | \$3,283 | \$3,451 | \$3,628 | \$3,814 | \$4,010 | \$4,215 | \$2,981 | \$3,417 |
| Over 600%/Do Not Report                                     | \$2,742 | \$2,885 | \$3,033 | \$3,188 | \$3,351 | \$3,523 | \$3,703 | \$3,893 | \$4,092 | \$4,302 | \$3,031 | \$3,426 |
| <i>Essential Plan - Annual Out-of-Pocket Expenses - FPL</i> |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 150%  | \$9     | \$10    | \$10    | \$11    | \$11    | \$11    | \$12    | \$12    | \$13    | \$13    | \$10    | \$11    |
| Over 151%   | \$139   | \$145   | \$150   | \$156   | \$163   | \$169   | \$176   | \$183   | \$190   | \$198   | \$151   | \$167   |
| <b>With Waiver - Scenario B - FPL</b>                       | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | 2032    | 2033    | 5 Year  | 10 Year |
| <i>Exchange - Annual Out-of-Pocket Expenses - FPL</i>       |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 250%  | \$2,757 | \$2,901 | \$3,049 | \$3,206 | \$3,370 | \$3,542 | \$3,724 | \$3,914 | \$4,115 | \$4,326 | \$3,059 | \$3,501 |
| 251% - 300%   | \$2,648 | \$2,785 | \$2,928 | \$3,078 | \$3,236 | \$3,401 | \$3,576 | \$3,759 | \$3,951 | \$4,154 | \$2,937 | \$3,362 |
| 301% - 350%   | \$2,645 | \$2,782 | \$2,925 | \$3,075 | \$3,232 | \$3,398 | \$3,572 | \$3,755 | \$3,947 | \$4,150 | \$2,934 | \$3,358 |
| 351% - 400%   | \$2,657 | \$2,795 | \$2,939 | \$3,089 | \$3,247 | \$3,414 | \$3,589 | \$3,772 | \$3,966 | \$4,169 | \$2,948 | \$3,374 |
| 401% - 500%   | \$2,676 | \$2,815 | \$2,959 | \$3,111 | \$3,270 | \$3,438 | \$3,614 | \$3,799 | \$3,994 | \$4,198 | \$2,969 | \$3,397 |
| 501% - 600%   | \$2,691 | \$2,830 | \$2,976 | \$3,128 | \$3,288 | \$3,457 | \$3,634 | \$3,820 | \$4,016 | \$4,221 | \$2,985 | \$3,416 |
| Over 600%/Do Not Report                                     | \$2,746 | \$2,889 | \$3,037 | \$3,192 | \$3,356 | \$3,528 | \$3,708 | \$3,898 | \$4,098 | \$4,308 | \$3,037 | \$3,439 |
| <i>Essential Plan - Annual Out-of-Pocket Expenses - FPL</i> |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 150%  | \$9     | \$10    | \$10    | \$11    | \$11    | \$11    | \$12    | \$12    | \$13    | \$13    | \$10    | \$11    |
| 151% - 200%   | \$139   | \$145   | \$150   | \$156   | \$163   | \$169   | \$176   | \$183   | \$190   | \$198   | \$151   | \$168   |
| Over 201%   | \$238   | \$247   | \$257   | \$267   | \$278   | \$289   | \$301   | \$313   | \$325   | \$338   | \$257   | \$286   |

**Table B13. Without and With-Waiver Annual Out-of-Pocket Expenses by Age, PY 2024 – 2033**

| <b>Without Waiver - Scenario B - Age</b>                    | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | 2032    | 2033    | 5 Year  | 10 Year |
|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| <b>Exchange - Annual Out-of-Pocket Expenses - Age</b>       |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$1,131 | \$1,190 | \$1,251 | \$1,315 | \$1,383 | \$1,453 | \$1,528 | \$1,606 | \$1,688 | \$1,775 | \$1,254 | \$1,432 |
| 21 - 25 Years   | \$1,126 | \$1,184 | \$1,245 | \$1,309 | \$1,376 | \$1,446 | \$1,520 | \$1,598 | \$1,680 | \$1,766 | \$1,248 | \$1,425 |
| 26 - 30 Years   | \$1,459 | \$1,534 | \$1,613 | \$1,696 | \$1,783 | \$1,874 | \$1,970 | \$2,071 | \$2,177 | \$2,289 | \$1,617 | \$1,847 |
| 31 - 35 Years   | \$1,783 | \$1,876 | \$1,972 | \$2,073 | \$2,179 | \$2,291 | \$2,408 | \$2,531 | \$2,661 | \$2,797 | \$1,976 | \$2,257 |
| 36 - 40 Years   | \$1,960 | \$2,062 | \$2,168 | \$2,279 | \$2,396 | \$2,518 | \$2,647 | \$2,783 | \$2,926 | \$3,076 | \$2,173 | \$2,482 |
| 41 - 45 Years   | \$2,186 | \$2,299 | \$2,417 | \$2,541 | \$2,671 | \$2,808 | \$2,952 | \$3,103 | \$3,262 | \$3,429 | \$2,423 | \$2,767 |
| 46 - 50 Years   | \$2,578 | \$2,712 | \$2,851 | \$2,997 | \$3,151 | \$3,312 | \$3,482 | \$3,660 | \$3,848 | \$4,045 | \$2,858 | \$3,264 |
| 51 - 55 Years   | \$3,180 | \$3,346 | \$3,517 | \$3,697 | \$3,887 | \$4,086 | \$4,295 | \$4,515 | \$4,746 | \$4,990 | \$3,525 | \$4,026 |
| 56 - 60 Years   | \$3,896 | \$4,098 | \$4,309 | \$4,529 | \$4,761 | \$5,005 | \$5,261 | \$5,531 | \$5,814 | \$6,112 | \$4,319 | \$4,932 |
| 61 - 65 Years   | \$4,802 | \$5,052 | \$5,311 | \$5,583 | \$5,869 | \$6,169 | \$6,485 | \$6,818 | \$7,167 | \$7,535 | \$5,323 | \$6,079 |
| <b>Essential Plan - Annual Out-of-Pocket Expenses - Age</b> |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$45    | \$47    | \$48    | \$50    | \$52    | \$54    | \$57    | \$59    | \$61    | \$64    | \$49    | \$54    |
| 21 - 25 Years   | \$45    | \$46    | \$48    | \$50    | \$52    | \$54    | \$56    | \$59    | \$61    | \$63    | \$48    | \$54    |
| 26 - 30 Years   | \$58    | \$60    | \$62    | \$65    | \$68    | \$70    | \$73    | \$76    | \$79    | \$82    | \$63    | \$69    |
| 31 - 35 Years   | \$71    | \$73    | \$76    | \$79    | \$83    | \$86    | \$89    | \$93    | \$97    | \$100   | \$76    | \$85    |
| 36 - 40 Years   | \$78    | \$81    | \$84    | \$87    | \$91    | \$94    | \$98    | \$102   | \$106   | \$110   | \$84    | \$93    |
| 41 - 45 Years   | \$87    | \$90    | \$94    | \$97    | \$101   | \$105   | \$109   | \$114   | \$118   | \$123   | \$94    | \$104   |
| 46 - 50 Years   | \$102   | \$106   | \$110   | \$115   | \$119   | \$124   | \$129   | \$134   | \$140   | \$145   | \$111   | \$123   |
| 51 - 55 Years   | \$126   | \$131   | \$136   | \$142   | \$147   | \$153   | \$159   | \$166   | \$172   | \$179   | \$136   | \$151   |
| 56 - 60 Years   | \$154   | \$160   | \$167   | \$174   | \$180   | \$188   | \$195   | \$203   | \$211   | \$220   | \$167   | \$185   |
| 61 - 65 Years   | \$190   | \$198   | \$206   | \$214   | \$222   | \$231   | \$241   | \$250   | \$260   | \$271   | \$206   | \$228   |
| <b>With Waiver - Scenario B - Age</b>                       |         |         |         |         |         |         |         |         |         |         |         |         |
| <b>Exchange - Annual Out-of-Pocket Expenses - Age</b>       |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$1,126 | \$1,185 | \$1,246 | \$1,310 | \$1,377 | \$1,447 | \$1,521 | \$1,599 | \$1,681 | \$1,767 | \$1,249 | \$1,426 |
| 21 - 25 Years   | \$1,121 | \$1,179 | \$1,240 | \$1,303 | \$1,370 | \$1,440 | \$1,514 | \$1,591 | \$1,673 | \$1,759 | \$1,243 | \$1,419 |
| 26 - 30 Years   | \$1,453 | \$1,528 | \$1,606 | \$1,689 | \$1,775 | \$1,866 | \$1,962 | \$2,062 | \$2,168 | \$2,279 | \$1,610 | \$1,839 |
| 31 - 35 Years   | \$1,775 | \$1,868 | \$1,964 | \$2,064 | \$2,170 | \$2,281 | \$2,398 | \$2,521 | \$2,650 | \$2,786 | \$1,968 | \$2,248 |
| 36 - 40 Years   | \$1,952 | \$2,054 | \$2,159 | \$2,269 | \$2,386 | \$2,508 | \$2,636 | \$2,771 | \$2,913 | \$3,063 | \$2,164 | \$2,471 |
| 41 - 45 Years   | \$2,176 | \$2,290 | \$2,407 | \$2,530 | \$2,660 | \$2,796 | \$2,939 | \$3,090 | \$3,248 | \$3,415 | \$2,413 | \$2,755 |
| 46 - 50 Years   | \$2,567 | \$2,701 | \$2,839 | \$2,985 | \$3,137 | \$3,298 | \$3,467 | \$3,645 | \$3,831 | \$4,028 | \$2,846 | \$3,250 |
| 51 - 55 Years   | \$3,167 | \$3,331 | \$3,502 | \$3,682 | \$3,870 | \$4,068 | \$4,277 | \$4,496 | \$4,726 | \$4,969 | \$3,511 | \$4,009 |
| 56 - 60 Years   | \$3,879 | \$4,081 | \$4,291 | \$4,510 | \$4,741 | \$4,984 | \$5,239 | \$5,508 | \$5,790 | \$6,087 | \$4,300 | \$4,911 |
| 61 - 65 Years   | \$4,782 | \$5,031 | \$5,289 | \$5,560 | \$5,844 | \$6,143 | \$6,458 | \$6,789 | \$7,137 | \$7,503 | \$5,301 | \$6,054 |
| <b>Essential Plan - Annual Out-of-Pocket Expenses - Age</b> |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$49    | \$51    | \$53    | \$55    | \$57    | \$59    | \$62    | \$64    | \$67    | \$69    | \$53    | \$59    |
| 21 - 25 Years   | \$48    | \$50    | \$52    | \$55    | \$57    | \$59    | \$61    | \$64    | \$66    | \$69    | \$53    | \$58    |
| 26 - 30 Years   | \$63    | \$65    | \$68    | \$71    | \$74    | \$76    | \$80    | \$83    | \$86    | \$89    | \$68    | \$75    |
| 31 - 35 Years   | \$77    | \$80    | \$83    | \$86    | \$90    | \$93    | \$97    | \$101   | \$105   | \$109   | \$83    | \$92    |
| 36 - 40 Years   | \$84    | \$88    | \$91    | \$95    | \$99    | \$103   | \$107   | \$111   | \$116   | \$120   | \$91    | \$101   |
| 41 - 45 Years   | \$94    | \$98    | \$102   | \$106   | \$110   | \$115   | \$119   | \$124   | \$129   | \$134   | \$102   | \$113   |
| 46 - 50 Years   | \$111   | \$115   | \$120   | \$125   | \$130   | \$135   | \$141   | \$146   | \$152   | \$158   | \$120   | \$133   |
| 51 - 55 Years   | \$137   | \$142   | \$148   | \$154   | \$160   | \$167   | \$173   | \$180   | \$187   | \$195   | \$148   | \$164   |
| 56 - 60 Years   | \$168   | \$175   | \$182   | \$189   | \$196   | \$204   | \$212   | \$221   | \$230   | \$239   | \$182   | \$201   |
| 61 - 65 Years   | \$207   | \$215   | \$224   | \$233   | \$242   | \$252   | \$262   | \$272   | \$283   | \$294   | \$224   | \$248   |

**Table B14. Without and With-Waiver Annual Enrollment by Age, PY 2024 – 2033**

| Without Waiver - Scenario B - Age        | 2024      | 2025      | 2026      | 2027      | 2028      | 2029      | 2030      | 2031      | 2032      | 2033      | 5 Year    | 10 Year   |
|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| <b>Exchange - Enrollment - Age</b>       |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 302,692   | 302,094   | 302,112   | 302,200   | 302,411   | 302,743   | 303,192   | 303,757   | 304,435   | 305,224   | 302,302   | 303,086   |
| 00 - 20 Years                            | 22,981    | 22,874    | 22,804    | 22,718    | 22,643    | 22,580    | 22,528    | 22,487    | 22,457    | 22,437    | 22,804    | 22,651    |
| 21 - 25 Years                            | 16,810    | 16,768    | 16,758    | 16,749    | 16,748    | 16,753    | 16,765    | 16,784    | 16,810    | 16,842    | 16,767    | 16,779    |
| 26 - 30 Years                            | 25,800    | 25,777    | 25,813    | 25,864    | 25,924    | 25,994    | 26,072    | 26,160    | 26,256    | 26,361    | 25,836    | 26,002    |
| 31 - 35 Years                            | 26,063    | 26,058    | 26,114    | 26,193    | 26,280    | 26,376    | 26,481    | 26,593    | 26,714    | 26,843    | 26,142    | 26,372    |
| 36 - 40 Years                            | 23,972    | 23,964    | 24,011    | 24,077    | 24,151    | 24,234    | 24,324    | 24,422    | 24,528    | 24,642    | 24,035    | 24,233    |
| 41 - 45 Years                            | 23,948    | 23,932    | 23,970    | 24,025    | 24,089    | 24,160    | 24,240    | 24,328    | 24,424    | 24,528    | 23,993    | 24,165    |
| 46 - 50 Years                            | 26,738    | 26,708    | 26,736    | 26,779    | 26,832    | 26,895    | 26,967    | 27,048    | 27,139    | 27,239    | 26,759    | 26,908    |
| 51 - 55 Years                            | 34,911    | 34,845    | 34,851    | 34,866    | 34,896    | 34,939    | 34,995    | 35,065    | 35,148    | 35,243    | 34,874    | 34,976    |
| 56 - 60 Years                            | 47,162    | 47,035    | 46,997    | 46,959    | 46,941    | 46,942    | 46,964    | 47,005    | 47,064    | 47,142    | 47,019    | 47,021    |
| 61 - 65 Years                            | 49,962    | 49,797    | 49,722    | 49,636    | 49,572    | 49,531    | 49,512    | 49,514    | 49,537    | 49,580    | 49,738    | 49,636    |
| 65+ Years                                | 4,346     | 4,336     | 4,335     | 4,334     | 4,335     | 4,338     | 4,343     | 4,349     | 4,357     | 4,367     | 4,337     | 4,344     |
| <b>Essential Plan - Enrollment - Age</b> |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 1,365,381 | 1,307,461 | 1,317,042 | 1,338,169 | 1,359,656 | 1,381,489 | 1,403,672 | 1,426,211 | 1,449,113 | 1,472,382 | 1,337,542 | 1,382,057 |
| 00 - 20 Years                            | 22,968    | 21,994    | 22,155    | 22,511    | 22,872    | 23,239    | 23,612    | 23,992    | 24,377    | 24,768    | 22,500    | 23,249    |
| 21 - 25 Years                            | 133,178   | 127,528   | 128,463   | 130,524   | 132,620   | 134,749   | 136,913   | 139,111   | 141,345   | 143,615   | 130,463   | 134,805   |
| 26 - 30 Years                            | 185,132   | 177,279   | 178,578   | 181,442   | 184,356   | 187,316   | 190,324   | 193,380   | 196,485   | 199,640   | 181,357   | 187,393   |
| 31 - 35 Years                            | 174,980   | 167,557   | 168,785   | 171,492   | 174,246   | 177,044   | 179,887   | 182,775   | 185,710   | 188,692   | 171,412   | 177,117   |
| 36 - 40 Years                            | 164,741   | 157,753   | 158,909   | 161,458   | 164,051   | 166,685   | 169,362   | 172,081   | 174,844   | 177,652   | 161,382   | 166,754   |
| 41 - 45 Years                            | 158,981   | 152,237   | 153,353   | 155,812   | 158,314   | 160,857   | 163,439   | 166,064   | 168,730   | 171,440   | 155,739   | 160,923   |
| 46 - 50 Years                            | 149,534   | 143,191   | 144,240   | 146,554   | 148,907   | 151,298   | 153,727   | 156,196   | 158,704   | 161,252   | 146,485   | 151,360   |
| 51 - 55 Years                            | 143,638   | 137,545   | 138,553   | 140,775   | 143,036   | 145,332   | 147,666   | 150,037   | 152,446   | 154,894   | 140,709   | 145,392   |
| 56 - 60 Years                            | 136,399   | 130,613   | 131,570   | 133,680   | 135,827   | 138,008   | 140,224   | 142,475   | 144,763   | 147,088   | 133,618   | 138,065   |
| 61 - 65 Years                            | 95,830    | 91,765    | 92,437    | 93,920    | 95,428    | 96,961    | 98,518    | 100,100   | 101,707   | 103,340   | 93,876    | 97,001    |
| 65+ Years                                | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         |
| <b>With Waiver - Scenario B - Age</b>    |           |           |           |           |           |           |           |           |           |           |           |           |
| <b>Exchange - Enrollment - Age</b>       |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 235,044   | 235,023   | 235,497   | 234,652   | 233,904   | 233,249   | 232,686   | 232,210   | 231,818   | 231,508   | 234,824   | 233,559   |
| 00 - 20 Years                            | 20,741    | 20,691    | 20,677    | 20,554    | 20,441    | 20,337    | 20,243    | 20,158    | 20,082    | 20,014    | 20,621    | 20,394    |
| 21 - 25 Years                            | 12,419    | 12,409    | 12,422    | 12,361    | 12,305    | 12,255    | 12,210    | 12,171    | 12,136    | 12,107    | 12,383    | 12,279    |
| 26 - 30 Years                            | 16,894    | 16,912    | 16,966    | 16,912    | 16,865    | 16,825    | 16,791    | 16,764    | 16,742    | 16,727    | 16,910    | 16,840    |
| 31 - 35 Years                            | 18,804    | 18,840    | 18,923    | 18,900    | 18,882    | 18,871    | 18,866    | 18,867    | 18,873    | 18,884    | 18,870    | 18,871    |
| 36 - 40 Years                            | 17,352    | 17,382    | 17,454    | 17,428    | 17,408    | 17,394    | 17,385    | 17,381    | 17,383    | 17,390    | 17,405    | 17,396    |
| 41 - 45 Years                            | 17,652    | 17,676    | 17,742    | 17,709    | 17,682    | 17,661    | 17,645    | 17,636    | 17,632    | 17,634    | 17,692    | 17,667    |
| 46 - 50 Years                            | 20,384    | 20,402    | 20,466    | 20,418    | 20,377    | 20,343    | 20,317    | 20,297    | 20,284    | 20,277    | 20,409    | 20,357    |
| 51 - 55 Years                            | 27,411    | 27,412    | 27,472    | 27,380    | 27,300    | 27,229    | 27,170    | 27,120    | 27,080    | 27,049    | 27,395    | 27,262    |
| 56 - 60 Years                            | 38,281    | 38,250    | 38,297    | 38,132    | 37,984    | 37,851    | 37,735    | 37,633    | 37,546    | 37,473    | 38,189    | 37,918    |
| 61 - 65 Years                            | 40,741    | 40,683    | 40,701    | 40,491    | 40,300    | 40,127    | 39,972    | 39,834    | 39,712    | 39,606    | 40,583    | 40,217    |
| 65+ Years                                | 4,365     | 4,365     | 4,376     | 4,368     | 4,361     | 4,356     | 4,351     | 4,349     | 4,347     | 4,347     | 4,367     | 4,359     |
| <b>Essential Plan - Enrollment - Age</b> |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 1,455,144 | 1,410,434 | 1,413,037 | 1,434,488 | 1,456,301 | 1,478,460 | 1,500,970 | 1,523,838 | 1,547,069 | 1,570,669 | 1,433,881 | 1,479,041 |
| 00 - 20 Years                            | 25,649    | 24,899    | 24,949    | 25,316    | 25,689    | 26,069    | 26,454    | 26,845    | 27,242    | 27,645    | 25,301    | 26,076    |
| 21 - 25 Years                            | 139,667   | 135,303   | 135,544   | 137,624   | 139,740   | 141,889   | 144,072   | 146,290   | 148,544   | 150,833   | 137,576   | 141,951   |
| 26 - 30 Years                            | 196,973   | 190,911   | 191,262   | 194,169   | 197,124   | 200,127   | 203,178   | 206,276   | 209,425   | 212,623   | 194,088   | 200,207   |
| 31 - 35 Years                            | 185,025   | 179,293   | 179,618   | 182,360   | 185,147   | 187,979   | 190,856   | 193,779   | 196,748   | 199,764   | 182,289   | 188,057   |
| 36 - 40 Years                            | 173,981   | 168,584   | 168,889   | 171,469   | 174,092   | 176,757   | 179,465   | 182,215   | 185,009   | 187,848   | 171,403   | 176,831   |
| 41 - 45 Years                            | 167,807   | 162,598   | 162,893   | 165,382   | 167,913   | 170,484   | 173,096   | 175,750   | 178,446   | 181,185   | 165,319   | 170,555   |
| 46 - 50 Years                            | 158,285   | 153,386   | 153,666   | 156,009   | 158,392   | 160,813   | 163,273   | 165,771   | 168,309   | 170,888   | 155,948   | 160,879   |
| 51 - 55 Years                            | 153,478   | 148,776   | 149,052   | 151,310   | 153,607   | 155,940   | 158,311   | 160,719   | 163,165   | 165,650   | 151,245   | 156,001   |
| 56 - 60 Years                            | 147,559   | 143,096   | 143,368   | 145,523   | 147,713   | 149,939   | 152,200   | 154,496   | 156,829   | 159,199   | 145,452   | 149,992   |
| 61 - 65 Years                            | 106,719   | 103,589   | 103,797   | 105,327   | 106,882   | 108,462   | 110,067   | 111,697   | 113,353   | 115,035   | 105,263   | 108,493   |
| 65+ Years                                | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         |



## Updated Appendix C: Scenario C Detailed 10-Year Estimates (Pregnancy Choice, Current Law & Insurer Reimbursement)

The following provides an analysis of the proposed 1332 Waiver under current law for expansion to consumers with incomes between 200 – 250% of the FPL and with the policy of allowing pregnant individuals to remain in the With-Waiver Essential Plan. The analysis estimates that the proposed Waiver meets each of the four guardrails for the five years of the Waiver and 10-year analysis.

**Table C1. Scenario C High-Level Guardrail Compliance of 1332 Waiver**

| Guardrail          | Estimated Impact With-Waiver (WW) Compared to Without-Waiver (WoW)   |
|--------------------|--|
| Comprehensiveness  | <p>The Waiver is projected to meet the comprehensiveness guardrail as consumers have access to more comprehensive coverage compared to the Baseline Without-Waiver Scenario.</p> <ul style="list-style-type: none"> <li>• Consumers with incomes between 200–250% of the FPL will experience an increase in comprehensiveness.</li> <li>• There are no expected impacts for other consumers in the individual market.</li> <li>• There are no expected impacts for other consumers in the Essential Plan.</li> </ul>   |
| Affordability      | <p>The Waiver is projected to meet the affordability guardrail as the affordability across the market is improved compared to the Baseline Without-Waiver Scenario.</p> <ul style="list-style-type: none"> <li>• Affordability for current Essential Plan members is not expected to change.</li> <li>• Affordability for consumers with incomes between 200–250% of the FPL is expected to improve under the Waiver for an aggregate savings of \$1.5 billion over the 5 years. <ul style="list-style-type: none"> <li>◦ This is an average annual savings of \$4,700 under the Waiver (\$2,300 in premiums and \$2,400 in out-of-pocket spend), which is approximately 12% of income for consumers 200 – 250% of the FPL.</li> </ul> </li> <li>• Affordability for subsidized On-Exchange consumers is not expected to change under the Waiver.</li> <li>• Affordability for subsidy-ineligible On-Exchange consumers and Off-Exchange consumers is also not expected to change under the Waiver, as premiums will be calculated at without-waiver levels as part of the insurer reimbursement program.</li> </ul> |
| Coverage           | <p>The Waiver is projected to meet the coverage guardrail as more consumers are expected to enroll in coverage compared to the Baseline Without-Waiver Scenario.</p> <ul style="list-style-type: none"> <li>• Overall enrollment for the Essential Plan and individual market is expected to increase by a combined 1.3% for PY 2024, 3.0% for PY 2025, 3.1% for PY 2026, 3.0% for PY 2027, and 3.0% for PY 2028.</li> <li>• Individuals who become pregnant may opt to remain in the Essential Plan, this is estimated to increase enrollment by 4,118 (average monthly enrollment over the 9 months of implementation) for 2024, 12,098 for 2025, 14,245 for 2026, 14,530 for 2027, and 14,820 for 2028.</li> </ul>  |
| Deficit Neutrality | <p>The Waiver is projected to meet the deficit neutrality guardrail and generate savings for the federal government.</p> <ul style="list-style-type: none"> <li>• The federal spend under the Waiver is estimated to decrease by \$9.8 billion in PY 2024 (which reflects the impact of the April 1, 2023 implementation date) and \$66.2 billion over the 5-year Waiver period, before pass-through funding.</li> <li>• The net federal spend under the waiver is estimated to decrease by \$22.5 million in PY 2024 and \$442.2 million over the 5-year waiver period, after accounting for pass-through funding.</li> </ul>   |

**Table C2. Baseline Without-Waiver Summary of Enrollment, Premium, and Cost Estimates, PY 2024-2033**

| Baseline - Scenario C                   | 2024      | 2025      | 2026      | 2027      | 2028      | 2029      | 2030      | 2031      | 2032      | 2033      | 5-Year Total | 10-Year Total |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---------------|
| <b>Unsubsidized On/Off-Exchange</b>     |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 66,122    | 64,435    | 124,043   | 123,236   | 122,435   | 121,639   | 120,849   | 120,063   | 119,283   | 118,507   | 100,054      | 110,061       |
| Average Premium PMPM                    | \$802     | \$843     | \$868     | \$913     | \$961     | \$1,011   | \$1,063   | \$1,118   | \$1,176   | \$1,237   | \$890        | \$1,016       |
| <b>Subsidized On-Exchange</b>           |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 236,570   | 237,659   | 149,369   | 150,356   | 151,349   | 152,348   | 153,354   | 154,367   | 155,387   | 156,413   | 185,061      | 169,717       |
| Average Premium PMPM                    | \$761     | \$801     | \$842     | \$886     | \$932     | \$981     | \$1,032   | \$1,085   | \$1,142   | \$1,201   | \$833        | \$949         |
| Average APTC PMPM                       | \$314     | \$345     | \$325     | \$358     | \$394     | \$432     | \$472     | \$514     | \$559     | \$607     | \$344        | \$423         |
| <b>Total Individual Market</b>          |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 302,692   | 302,094   | 273,412   | 273,592   | 273,784   | 273,988   | 274,203   | 274,430   | 274,670   | 274,920   | 285,115      | 279,779       |
| Average Premium PMPM                    | \$770     | \$810     | \$854     | \$898     | \$945     | \$994     | \$1,046   | \$1,100   | \$1,157   | \$1,217   | \$853        | \$975         |
| Aggregate Premiums (millions)           | \$2,798   | \$2,936   | \$2,802   | \$2,950   | \$3,105   | \$3,268   | \$3,440   | \$3,622   | \$3,813   | \$4,014   | \$14,590     | \$32,747      |
| Projected Federal Spend (millions)      | \$833     | \$918     | \$544     | \$604     | \$668     | \$737     | \$810     | \$889     | \$973     | \$1,063   | \$3,567      | \$8,039       |
| <b>Essential Plan</b>                   |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 1,365,381 | 1,307,461 | 1,317,042 | 1,338,169 | 1,359,656 | 1,381,489 | 1,403,672 | 1,426,211 | 1,449,113 | 1,472,382 | 1,337,542    | 1,382,057     |
| Average Premium PMPM                    | \$625     | \$647     | \$671     | \$695     | \$720     | \$747     | \$774     | \$803     | \$832     | \$863     | \$672        | \$740         |
| Aggregate Premiums (millions)           | \$10,237  | \$10,156  | \$10,601  | \$11,162  | \$11,755  | \$12,380  | \$13,041  | \$13,738  | \$14,474  | \$15,251  | \$53,912     | \$122,796     |
| Quality Incentive Pool Costs (millions) | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$1,125      | \$2,250       |
| LTSS Coverage (millions)                | \$0       | \$131     | \$137     | \$144     | \$152     | \$160     | \$168     | \$177     | \$187     | \$197     | \$563        | \$1,451       |
| SDoH/BH Grant Program (millions)        | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$125        | \$250         |
| Total Program Costs (millions)          | \$10,487  | \$10,537  | \$10,988  | \$11,556  | \$12,156  | \$12,790  | \$13,459  | \$14,165  | \$14,911  | \$15,698  | \$55,725     | \$126,747     |
| Projected Federal Spend (millions)      | \$12,829  | \$12,924  | \$13,126  | \$14,030  | \$14,997  | \$16,030  | \$17,134  | \$18,315  | \$19,577  | \$20,925  | \$67,907     | \$159,888     |
| <b>Other Federal Spend/Revenue</b>      |           |           |           |           |           |           |           |           |           |           |              |               |
| Pregnancy Medicaid Spend (millions)     | \$25      | \$89      | \$101     | \$108     | \$115     | \$124     | \$133     | \$142     | \$152     | \$161     | \$438        | \$1,149       |
| ESRP Revenue (millions)                 | (\$3)     | (\$3)     | (\$3)     | (\$3)     | (\$4)     | (\$4)     | (\$5)     | (\$6)     | (\$7)     | (\$8)     | (\$16)       | (\$45)        |
| <b>Combined Totals</b>                  |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 1,668,073 | 1,609,554 | 1,590,454 | 1,611,761 | 1,633,440 | 1,655,476 | 1,677,875 | 1,700,642 | 1,723,782 | 1,747,302 | 1,622,657    | 1,661,836     |
| Projected Federal Spend (millions)      | \$13,685  | \$13,928  | \$13,768  | \$14,739  | \$15,776  | \$16,886  | \$18,072  | \$19,340  | \$20,695  | \$22,142  | \$71,896     | \$169,032     |

<sup>1</sup>5- and 10-year totals are straight averages.

**Table C3. With-Waiver Summary of Enrollment, Premium, and Cost Estimates, PY 2024-2033**

| With Waiver - Scenario C                | 2024      | 2025      | 2026      | 2027      | 2028      | 2029      | 2030      | 2031      | 2032      | 2033      | 5-Year Total | 10-Year Total |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|---------------|
| <b>Unsubsidized On/Off-Exchange</b>     |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 66,122    | 64,587    | 124,347   | 123,692   | 123,043   | 122,399   | 121,761   | 121,127   | 120,499   | 119,875   | 100,358      | 110,745       |
| Average Premium PMPM                    | \$802     | \$843     | \$868     | \$913     | \$961     | \$1,010   | \$1,063   | \$1,118   | \$1,176   | \$1,237   | \$890        | \$1,016       |
| <b>Subsidized On-Exchange</b>           |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 186,174   | 170,243   | 87,405    | 87,979    | 88,556    | 89,138    | 89,724    | 90,313    | 90,906    | 91,503    | 124,071      | 107,194       |
| Average Premium PMPM                    | \$761     | \$801     | \$842     | \$886     | \$932     | \$981     | \$1,032   | \$1,085   | \$1,142   | \$1,201   | \$826        | \$937         |
| Average APTC PMPM                       | \$316     | \$345     | \$325     | \$358     | \$394     | \$432     | \$472     | \$514     | \$559     | \$607     | \$342        | \$416         |
| <b>Total Individual Market</b>          |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 252,296   | 234,830   | 211,752   | 211,671   | 211,599   | 211,537   | 211,485   | 211,440   | 211,405   | 211,378   | 224,430      | 217,939       |
| Average Premium PMPM                    | \$772     | \$812     | \$858     | \$902     | \$949     | \$998     | \$1,050   | \$1,104   | \$1,161   | \$1,221   | \$854        | \$977         |
| Aggregate Premiums (millions)           | \$2,336   | \$2,289   | \$2,179   | \$2,291   | \$2,409   | \$2,533   | \$2,664   | \$2,801   | \$2,946   | \$3,098   | \$11,505     | \$25,547      |
| Projected Federal Spend (millions)      | \$659     | \$658     | \$318     | \$353     | \$391     | \$431     | \$474     | \$520     | \$569     | \$622     | \$2,379      | \$4,996       |
| <b>Essential Plan</b>                   |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 1,436,781 | 1,422,531 | 1,427,282 | 1,449,018 | 1,471,121 | 1,493,577 | 1,516,390 | 1,539,566 | 1,563,111 | 1,587,032 | 1,441,347    | 1,490,641     |
| Average Premium PMPM                    | \$629     | \$655     | \$678     | \$703     | \$729     | \$755     | \$783     | \$812     | \$842     | \$873     | \$679        | \$749         |
| Aggregate Premiums (millions)           | \$10,849  | \$11,177  | \$11,615  | \$12,222  | \$12,862  | \$13,537  | \$14,249  | \$15,000  | \$15,793  | \$16,629  | \$58,725     | \$133,932     |
| IRIP Payment (millions)                 | \$45      | \$63      | \$60      | \$63      | \$66      | \$69      | \$73      | \$77      | \$80      | \$85      | \$295        | \$679         |
| Quality Incentive Pool Costs (millions) | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$225     | \$1,125      | \$2,250       |
| LTSS Coverage (millions)                | \$0       | \$131     | \$136     | \$143     | \$151     | \$159     | \$167     | \$176     | \$185     | \$195     | \$561        | \$1,442       |
| SDoH/BH Grant Program (millions)        | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$25      | \$125        | \$250         |
| Total Program Costs (millions)          | \$11,144  | \$11,621  | \$12,061  | \$12,677  | \$13,328  | \$14,014  | \$14,738  | \$15,502  | \$16,308  | \$17,159  | \$60,831     | \$138,553     |
| Projected Federal Spend (millions)      | \$3,207   | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$3,207      | \$3,207       |
| <b>Other Federal Spend/Revenue</b>      |           |           |           |           |           |           |           |           |           |           |              |               |
| Pregnancy Medicaid Spend (millions)     | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0          | \$0           |
| ESRP Revenue (millions)                 | (\$1)     | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | \$0       | (\$1)        | (\$1)         |
| <b>Combined Totals</b>                  |           |           |           |           |           |           |           |           |           |           |              |               |
| Enrollment <sup>1</sup>                 | 1,689,077 | 1,657,361 | 1,639,034 | 1,660,689 | 1,682,721 | 1,705,114 | 1,727,874 | 1,751,006 | 1,774,517 | 1,798,410 | 1,665,776    | 1,708,580     |
| Projected Federal Spend (millions)      | \$3,866   | \$658     | \$318     | \$353     | \$391     | \$431     | \$474     | \$520     | \$569     | \$622     | \$5,586      | \$8,202       |

<sup>1</sup> 5- and 10-year totals are straight averages. 2024 enrollment, premium, and APTC amounts reflect the average monthly enrollment for the 12-month period. 2024 amounts in other With Waiver enrollment tables reflect a 9-month average after waiver implementation.

Note: The program investments for Quality Incentive Pool and SDoH/BH Grant Program for 2024 are displayed as total costs over all 12 months. The first 3 months of these amounts would be incurred under the BHP and the last 9 months would be incurred under the 1332 Waiver.

**Table C3. With-Waiver PY 2024 Break-Out**

|   | 200-250% FPL   | All Other FPL | 200-250% FPL    | All Other FPL |
|---|----------------|---------------|-----------------|---------------|
| <b>With Waiver - Scenario C</b>         | 1/1/24-3/31/24 |               | 4/1/24-12/31/24 |               |
| <b>Unsubsidized On/Off-Exchange</b>     |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 66,122        | 0               | 66,122        |
| Average Premium PMPM                    | \$0            | \$802         | \$0             | \$802         |
| <b>Subsidized On-Exchange</b>           |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 168,922       | 410             | 168,512       |
| Average Premium PMPM                    | \$756          | \$761         | \$756           | \$761         |
| Average APTC PMPM                       | \$332          | \$314         | \$332           | \$314         |
| <b>Total Individual Market</b>          |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 69,010         | 235,044       | 410             | 234,634       |
| Average Premium PMPM                    | \$756          | \$773         | \$756           | \$773         |
| Aggregate Premiums (millions)           | \$156          | \$545         | \$3             | \$1,632       |
| Projected Federal Spend (millions)      | \$64           | \$149         | \$1             | \$445         |
| <b>Essential Plan</b>                   |                |               |                 |               |
| Enrollment <sup>1</sup>                 | 0              | 1,369,339     | 89,922          | 1,369,339     |
| Average Premium PMPM                    | \$0            | \$625         | \$718           | \$625         |
| Aggregate Premiums (millions)           | \$0            | \$2,567       | \$581           | \$7,701       |
| IRIP Payment (millions)                 |                | \$0           |                 | \$45          |
| Quality Incentive Pool Costs (millions) |                | \$56          |                 | \$169         |
| LTSS Coverage (millions)                |                | \$0           |                 | \$0           |
| SDoH/BH Grant Program (millions)        |                | \$6           |                 | \$19          |
| Total Program Costs (millions)          |                | \$2,786       |                 | \$8,358       |
| Projected Federal Spend (millions)      |                | \$802         |                 | \$2,405       |

**Table C4. Baseline Without and With-Waiver Annual Funding Estimates, PY 2024-2033**

| Scenario C                          | 2024                    | 2025                     | 2026                    | 2027                    | 2028                    | 2029                    | 2030                    | 2031                    | 2032                    | 2033                    |
|-------------------------------------|-------------------------|--------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| <b>Individual Market</b>            |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver PTCs                 | \$832,994,392           | \$918,399,798            | \$543,752,041           | \$603,685,799           | \$667,898,054           | \$736,660,976           | \$810,263,312           | \$889,011,384           | \$973,230,136           | \$1,063,264,246         |
| With Waiver PTCs                    | \$658,913,296           | \$657,880,975            | \$318,180,580           | \$353,238,621           | \$390,797,546           | \$431,016,325           | \$474,063,603           | \$520,118,284           | \$569,370,136           | \$622,020,447           |
| Difference                          | \$174,081,096           | \$260,518,823            | \$225,571,462           | \$250,447,179           | \$277,100,509           | \$305,644,651           | \$336,199,708           | \$368,893,100           | \$403,860,000           | \$441,243,800           |
| <b>Essential Plan</b>               |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver BHP Funding          | \$12,829,257,312        | \$12,923,855,551         | \$13,126,291,459        | \$14,030,366,556        | \$14,996,951,508        | \$16,030,127,338        | \$17,134,481,121        | \$18,314,916,475        | \$19,576,674,841        | \$20,925,358,757        |
| With Waiver BHP Funding             | \$3,207,314,328         | \$0                      | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     | \$0                     |
| Difference                          | \$9,621,942,984         | \$12,923,855,551         | \$13,126,291,459        | \$14,030,366,556        | \$14,996,951,508        | \$16,030,127,338        | \$17,134,481,121        | \$18,314,916,475        | \$19,576,674,841        | \$20,925,358,757        |
| <b>Other Federal Spend/Savings</b>  |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Pregnancy Medicaid Total Enrollment | 4,118                   | 12,098                   | 14,245                  | 14,530                  | 14,820                  | 15,117                  | 15,419                  | 15,728                  | 16,042                  | 16,363                  |
| Enrollment >138% FPL                | 4,074                   | 11,969                   | 14,093                  | 14,375                  | 14,663                  | 14,956                  | 15,255                  | 15,560                  | 15,871                  | 16,189                  |
| Pregnancy Medicaid Reduction        | \$25,108,274            | \$88,542,913             | \$100,943,689           | \$107,885,204           | \$115,310,143           | \$123,755,769           | \$132,643,493           | \$141,777,455           | \$151,755,984           | \$161,163,031           |
| Employer Penalty Loss               | (\$2,592,000)           | (\$2,970,000)            | (\$3,006,000)           | (\$3,258,000)           | (\$3,746,700)           | (\$4,308,705)           | (\$4,955,011)           | (\$5,698,262)           | (\$6,553,002)           | (\$7,535,952)           |
| <b>Combined Totals</b>              |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver Federal Spend        | \$13,684,767,979        | \$13,927,828,262         | \$13,767,981,189        | \$14,738,679,559        | \$15,776,413,005        | \$16,886,235,378        | \$18,072,432,915        | \$19,340,007,052        | \$20,695,107,960        | \$22,142,250,082        |
| With Waiver Federal Spend           | \$3,866,227,625         | \$657,880,975            | \$318,180,580           | \$353,238,621           | \$390,797,546           | \$431,016,325           | \$474,063,603           | \$520,118,284           | \$569,370,136           | \$622,020,447           |
| <b>Total Federal Savings</b>        | <b>\$9,818,540,354</b>  | <b>\$13,269,947,287</b>  | <b>\$13,449,800,610</b> | <b>\$14,385,440,939</b> | <b>\$15,385,615,460</b> | <b>\$16,455,219,054</b> | <b>\$17,598,369,312</b> | <b>\$18,819,888,768</b> | <b>\$20,125,737,823</b> | <b>\$21,520,229,635</b> |
| Requested Pass-through              | \$9,796,024,080         | \$13,184,374,374         | \$13,351,862,921        | \$14,280,813,734        | \$15,274,052,017        | \$16,335,771,989        | \$17,470,680,829        | \$18,683,809,575        | \$19,980,534,841        | \$21,366,602,556        |
| <b>Net Federal Savings</b>          | <b>\$22,516,274</b>     | <b>\$85,572,913</b>      | <b>\$97,937,689</b>     | <b>\$104,627,204</b>    | <b>\$111,563,443</b>    | <b>\$119,447,064</b>    | <b>\$127,688,482</b>    | <b>\$136,079,193</b>    | <b>\$145,202,982</b>    | <b>\$153,627,079</b>    |
| <b>Combined Totals</b>              |                         |                          |                         |                         |                         |                         |                         |                         |                         |                         |
|                                     | 5-Year Total            | 10-Year Total            |                         |                         |                         |                         |                         |                         |                         |                         |
| Without Waiver Federal Spend        | \$71,895,669,994        | \$169,031,703,380        |                         |                         |                         |                         |                         |                         |                         |                         |
| With Waiver Federal Spend           | \$5,586,325,345         | \$8,202,914,140          |                         |                         |                         |                         |                         |                         |                         |                         |
| <b>Total Federal Savings</b>        | <b>\$66,309,344,649</b> | <b>\$160,828,789,240</b> |                         |                         |                         |                         |                         |                         |                         |                         |
| Requested Pass-through              | \$65,887,127,126        | \$159,724,526,916        |                         |                         |                         |                         |                         |                         |                         |                         |
| <b>Net Federal Savings</b>          | <b>\$422,217,522</b>    | <b>\$1,104,262,324</b>   |                         |                         |                         |                         |                         |                         |                         |                         |

Note: For 2024 due to the April 1 implementation date, there will still be 1 quarter of BHP funding compared to the other years of the Waiver.

**Table C5. SLCSP Premium Without and With-Waiver by Rating Area, PY 2024 – 2033**

| <b>Baseline - Scenario C</b>                                    | 2024  | 2025  | 2026  | 2027  | 2028  | 2029    | 2030    | 2031    | 2032    | 2033    |
|---|-------|-------|-------|-------|-------|---------|---------|---------|---------|---------|
| <i>Second Lowest Cost Silver Plans (SLCSP) Monthly Premiums</i> |       |       |       |       |       |         |         |         |         |         |
| Rating Area 1   | \$599 | \$630 | \$662 | \$697 | \$733 | \$771   | \$811   | \$853   | \$898   | \$945   |
| Rating Area 2   | \$512 | \$539 | \$567 | \$596 | \$627 | \$660   | \$694   | \$731   | \$769   | \$808   |
| Rating Area 3   | \$744 | \$782 | \$823 | \$866 | \$911 | \$958   | \$1,008 | \$1,061 | \$1,116 | \$1,174 |
| Rating Area 4   | \$808 | \$850 | \$894 | \$941 | \$990 | \$1,041 | \$1,095 | \$1,152 | \$1,212 | \$1,275 |
| Rating Area 5   | \$600 | \$631 | \$664 | \$699 | \$735 | \$773   | \$813   | \$856   | \$900   | \$947   |
| Rating Area 6   | \$617 | \$649 | \$683 | \$718 | \$756 | \$795   | \$836   | \$880   | \$926   | \$974   |
| Rating Area 7   | \$612 | \$644 | \$677 | \$712 | \$749 | \$788   | \$829   | \$872   | \$918   | \$965   |
| Rating Area 8   | \$775 | \$815 | \$857 | \$902 | \$949 | \$998   | \$1,050 | \$1,105 | \$1,162 | \$1,222 |
| <b>With Waiver - Scenario C</b>                                 | 2024  | 2025  | 2026  | 2027  | 2028  | 2029    | 2030    | 2031    | 2032    | 2033    |
| <i>Second Lowest Cost Silver Plans (SLCSP) Monthly Premiums</i> |       |       |       |       |       |         |         |         |         |         |
| Rating Area 1   | \$599 | \$630 | \$663 | \$697 | \$733 | \$772   | \$812   | \$854   | \$898   | \$945   |
| Rating Area 2   | \$512 | \$539 | \$567 | \$597 | \$628 | \$660   | \$695   | \$731   | \$769   | \$809   |
| Rating Area 3   | \$744 | \$783 | \$824 | \$866 | \$911 | \$959   | \$1,009 | \$1,061 | \$1,116 | \$1,174 |
| Rating Area 4   | \$808 | \$850 | \$895 | \$941 | \$990 | \$1,042 | \$1,096 | \$1,153 | \$1,213 | \$1,276 |
| Rating Area 5   | \$600 | \$632 | \$664 | \$699 | \$735 | \$774   | \$814   | \$856   | \$901   | \$948   |
| Rating Area 6   | \$617 | \$649 | \$683 | \$719 | \$756 | \$795   | \$837   | \$880   | \$926   | \$974   |
| Rating Area 7   | \$612 | \$644 | \$677 | \$713 | \$750 | \$789   | \$830   | \$873   | \$918   | \$966   |
| Rating Area 8   | \$775 | \$815 | \$858 | \$902 | \$949 | \$999   | \$1,051 | \$1,105 | \$1,163 | \$1,223 |

**Table C6. Baseline Without Average Annual Enrollment by Metal Level, PY 2024 – 2033**

| <b>Baseline - Scenario C</b>                   | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,668,073</b> | <b>1,609,554</b> | <b>1,590,454</b> | <b>1,611,761</b> | <b>1,633,440</b> | <b>1,655,476</b> | <b>1,677,875</b> | <b>1,700,642</b> | <b>1,723,782</b> | <b>1,747,302</b> |
| <i>Unsubsidized On/Off-Exchange Enrollment</i> | 66,122           | 64,435           | 124,043          | 123,236          | 122,435          | 121,639          | 120,849          | 120,063          | 119,283          | 118,507          |
| Catastrophic                                   | 5,073            | 5,025            | 4,739            | 4,730            | 4,722            | 4,714            | 4,706            | 4,699            | 4,691            | 4,684            |
| Bronze   | 21,026           | 20,462           | 42,758           | 42,472           | 42,189           | 41,907           | 41,627           | 41,349           | 41,072           | 40,797           |
| Silver   | 21,525           | 20,941           | 45,249           | 44,945           | 44,644           | 44,344           | 44,046           | 43,750           | 43,456           | 43,164           |
| Gold   | 10,038           | 9,771            | 17,674           | 17,556           | 17,439           | 17,322           | 17,206           | 17,091           | 16,977           | 16,863           |
| Platinum                                       | 8,461            | 8,236            | 13,624           | 13,533           | 13,442           | 13,352           | 13,263           | 13,174           | 13,086           | 12,999           |
| <i>Subsidized On-Exchange Enrollment</i>       | 236,570          | 237,659          | 149,369          | 150,356          | 151,349          | 152,348          | 153,354          | 154,367          | 155,387          | 156,413          |
| Catastrophic                                   | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Bronze   | 88,312           | 88,718           | 55,760           | 56,128           | 56,499           | 56,872           | 57,247           | 57,625           | 58,006           | 58,389           |
| Silver   | 96,331           | 96,774           | 60,823           | 61,225           | 61,629           | 62,036           | 62,446           | 62,858           | 63,273           | 63,691           |
| Gold   | 30,993           | 31,136           | 19,569           | 19,698           | 19,828           | 19,959           | 20,091           | 20,224           | 20,357           | 20,492           |
| Platinum                                       | 20,934           | 21,030           | 13,218           | 13,305           | 13,393           | 13,481           | 13,570           | 13,660           | 13,750           | 13,841           |
| <b>Essential Plan Enrollment</b>               | <b>1,365,381</b> | <b>1,307,461</b> | <b>1,317,042</b> | <b>1,338,169</b> | <b>1,359,656</b> | <b>1,381,489</b> | <b>1,403,672</b> | <b>1,426,211</b> | <b>1,449,113</b> | <b>1,472,382</b> |
| EP1  | 573,460          | 549,133          | 553,158          | 562,031          | 571,056          | 580,225          | 589,542          | 599,009          | 608,627          | 618,400          |
| EP2  | 163,846          | 156,895          | 158,045          | 160,580          | 163,159          | 165,779          | 168,441          | 171,145          | 173,894          | 176,686          |
| EP3  | 95,577           | 91,522           | 92,193           | 93,672           | 95,176           | 96,704           | 98,257           | 99,835           | 101,438          | 103,067          |
| EP4  | 532,498          | 509,910          | 513,646          | 521,886          | 530,266          | 538,781          | 547,432          | 556,222          | 565,154          | 574,229          |

**Table C7. With-Waiver Average Annual Enrollment by Metal Level, PY 2024 – 2033**

| <b>With Waiver - Scenario C</b>                | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,694,305</b> | <b>1,657,361</b> | <b>1,639,034</b> | <b>1,660,689</b> | <b>1,682,721</b> | <b>1,705,114</b> | <b>1,727,874</b> | <b>1,751,006</b> | <b>1,774,517</b> | <b>1,798,410</b> |
| <i>Unsubsidized On/Off-Exchange Enrollment</i> | 66,122           | 64,587           | 124,347          | 123,692          | 123,043          | 122,399          | 121,761          | 121,127          | 120,499          | 119,875          |
| Catastrophic                                   | 5,073            | 5,037            | 4,750            | 4,748            | 4,745            | 4,743            | 4,742            | 4,740            | 4,739            | 4,738            |
| Bronze   | 21,026           | 20,510           | 42,863           | 42,629           | 42,398           | 42,169           | 41,941           | 41,715           | 41,491           | 41,268           |
| Silver   | 21,525           | 20,991           | 45,360           | 45,112           | 44,865           | 44,621           | 44,379           | 44,138           | 43,899           | 43,662           |
| Gold   | 10,038           | 9,794            | 17,717           | 17,621           | 17,525           | 17,430           | 17,336           | 17,243           | 17,150           | 17,058           |
| Platinum                                       | 8,461            | 8,255            | 13,657           | 13,583           | 13,509           | 13,436           | 13,363           | 13,291           | 13,220           | 13,149           |
| <i>Subsidized On-Exchange Enrollment</i>       | 168,922          | 170,243          | 87,405           | 87,979           | 88,556           | 89,138           | 89,724           | 90,313           | 90,906           | 91,503           |
| Catastrophic                                   | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Bronze   | 63,059           | 63,552           | 32,628           | 32,842           | 33,058           | 33,275           | 33,494           | 33,714           | 33,935           | 34,158           |
| Silver   | 68,785           | 69,323           | 35,591           | 35,825           | 36,060           | 36,297           | 36,535           | 36,775           | 37,017           | 37,260           |
| Gold   | 22,131           | 22,304           | 11,451           | 11,526           | 11,602           | 11,678           | 11,755           | 11,832           | 11,910           | 11,988           |
| Platinum                                       | 14,948           | 15,065           | 7,734            | 7,785            | 7,836            | 7,888            | 7,940            | 7,992            | 8,044            | 8,097            |
| <b>Essential Plan Enrollment</b>               | <b>1,459,261</b> | <b>1,422,531</b> | <b>1,427,282</b> | <b>1,449,018</b> | <b>1,471,121</b> | <b>1,493,577</b> | <b>1,516,390</b> | <b>1,539,566</b> | <b>1,563,111</b> | <b>1,587,032</b> |
| EP1  | 575,666          | 557,117          | 562,735          | 571,807          | 581,034          | 590,411          | 599,938          | 609,620          | 619,459          | 629,456          |
| EP2  | 164,476          | 159,176          | 160,781          | 163,373          | 166,010          | 168,689          | 171,411          | 174,177          | 176,988          | 179,844          |
| EP3  | 95,747           | 91,696           | 92,371           | 93,853           | 95,361           | 96,893           | 98,449           | 100,031          | 101,638          | 103,271          |
| EP4  | 533,450          | 510,880          | 514,636          | 522,895          | 531,295          | 539,831          | 548,503          | 557,315          | 566,268          | 575,365          |
| Undocumented Population                        | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 200%-250% FPL Population                       | 89,922           | 103,662          | 96,760           | 97,090           | 97,421           | 97,754           | 98,088           | 98,423           | 98,759           | 99,096           |

Note: This table displays the With Waiver amounts as 9-month averages for 2024, since the first year of the waiver will only contain 9 months. There is an increase from the WoW scenario (~0.6% in total) for the on-exchange Unsubsidized and Subsidized population with incomes above 250% of the FPL. This is due to increased awareness, concentrated advertisement, and outreach activities with the implementation of the waiver.



**Table C8. Baseline Without-Waiver Average Annual Enrollment by FPL, PY 2024 – 2033**

| <b>Baseline - Scenario C</b>                   | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,668,073</b> | <b>1,609,554</b> | <b>1,590,454</b> | <b>1,611,761</b> | <b>1,633,440</b> | <b>1,655,476</b> | <b>1,677,875</b> | <b>1,700,642</b> | <b>1,723,782</b> | <b>1,747,302</b> |
| <b>Unsubsidized On/Off-Exchange Enrollment</b> | <b>66,122</b>    | <b>64,435</b>    | <b>124,043</b>   | <b>123,236</b>   | <b>122,435</b>   | <b>121,639</b>   | <b>120,849</b>   | <b>120,063</b>   | <b>119,283</b>   | <b>118,507</b>   |
| Below 400%                                     | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 401% - 500%                                    | 0                | 0                | 24,239           | 24,082           | 23,925           | 23,770           | 23,615           | 23,462           | 23,309           | 23,158           |
| 501% - 600%                                    | 0                | 0                | 12,400           | 12,319           | 12,239           | 12,159           | 12,080           | 12,002           | 11,924           | 11,846           |
| Over 600%                                      | 12,291           | 13,896           | 15,502           | 15,401           | 15,301           | 15,201           | 15,103           | 15,004           | 14,907           | 14,810           |
| Do Not Report                                  | 53,831           | 50,539           | 71,902           | 71,435           | 70,970           | 70,509           | 70,051           | 69,595           | 69,143           | 68,693           |
| <b>Subsidized On-Exchange Enrollment</b>       | <b>236,570</b>   | <b>237,659</b>   | <b>149,369</b>   | <b>150,356</b>   | <b>151,349</b>   | <b>152,348</b>   | <b>153,354</b>   | <b>154,367</b>   | <b>155,387</b>   | <b>156,413</b>   |
| Below 139%                                     | 7,523            | 7,558            | 4,750            | 4,782            | 4,813            | 4,845            | 4,877            | 4,909            | 4,942            | 4,974            |
| 139% - 150%                                    | 288              | 290              | 182              | 183              | 184              | 186              | 187              | 188              | 189              | 191              |
| 151% - 200%                                    | 1,757            | 1,765            | 1,110            | 1,117            | 1,124            | 1,132            | 1,139            | 1,147            | 1,154            | 1,162            |
| 201% - 250%                                    | 69,010           | 69,122           | 62,093           | 62,470           | 62,849           | 63,230           | 63,614           | 64,000           | 64,388           | 64,779           |
| 251% - 300%                                    | 54,227           | 54,547           | 36,619           | 36,876           | 37,134           | 37,395           | 37,657           | 37,921           | 38,187           | 38,455           |
| 301% - 350%                                    | 40,022           | 40,258           | 27,027           | 27,216           | 27,407           | 27,599           | 27,793           | 27,988           | 28,184           | 28,381           |
| 351% - 400%                                    | 26,047           | 26,201           | 17,589           | 17,713           | 17,837           | 17,962           | 18,088           | 18,215           | 18,342           | 18,471           |
| 401% - 500%                                    | 21,502           | 21,629           | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 501% - 600%                                    | 9,595            | 9,652            | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Over 600%                                      | 6,599            | 6,638            | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| <b>Essential Plan Enrollment</b>               | <b>1,365,381</b> | <b>1,307,461</b> | <b>1,317,042</b> | <b>1,338,169</b> | <b>1,359,656</b> | <b>1,381,489</b> | <b>1,403,672</b> | <b>1,426,211</b> | <b>1,449,113</b> | <b>1,472,382</b> |
| Below 150%                                     | 791,921          | 758,327          | 763,884          | 776,138          | 788,601          | 801,264          | 814,130          | 827,203          | 840,485          | 853,981          |
| Over 151%                                      | 573,460          | 549,133          | 553,158          | 562,031          | 571,056          | 580,225          | 589,542          | 599,009          | 608,627          | 618,400          |

**Table C9. With-Waiver PY Average Annual Enrollment by FPL, PY 2024 – 2033**

| <b>With Waiver - Scenario C</b>                | 2024             | 2025             | 2026             | 2027             | 2028             | 2029             | 2030             | 2031             | 2032             | 2033             |
|--|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| <b>Total Combined Enrollment</b>               | <b>1,694,305</b> | <b>1,657,361</b> | <b>1,639,034</b> | <b>1,660,689</b> | <b>1,682,721</b> | <b>1,705,114</b> | <b>1,727,874</b> | <b>1,751,006</b> | <b>1,774,517</b> | <b>1,798,410</b> |
| <b>Unsubsidized On/Off-Exchange Enrollment</b> | <b>66,122</b>    | <b>64,587</b>    | <b>124,347</b>   | <b>123,692</b>   | <b>123,043</b>   | <b>122,399</b>   | <b>121,761</b>   | <b>121,127</b>   | <b>120,499</b>   | <b>119,875</b>   |
| Below 400% <sup>2</sup>                        | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 401% - 500% <sup>2</sup>                       | 0                | 0                | 24,299           | 24,171           | 24,044           | 23,918           | 23,793           | 23,670           | 23,547           | 23,425           |
| 501% - 600% <sup>2</sup>                       | 0                | 0                | 12,430           | 12,365           | 12,300           | 12,235           | 12,171           | 12,108           | 12,045           | 11,983           |
| Over 600% <sup>2</sup>                         | 12,314           | 13,927           | 15,540           | 15,458           | 15,377           | 15,296           | 15,217           | 15,137           | 15,059           | 14,981           |
| Do Not Report <sup>2</sup>                     | 53,808           | 50,660           | 72,078           | 71,699           | 71,323           | 70,949           | 70,579           | 70,212           | 69,848           | 69,486           |
| <b>Subsidized On-Exchange Enrollment</b>       | <b>168,922</b>   | <b>170,243</b>   | <b>87,405</b>    | <b>87,979</b>    | <b>88,556</b>    | <b>89,138</b>    | <b>89,724</b>    | <b>90,313</b>    | <b>90,906</b>    | <b>91,503</b>    |
| Below 139% <sup>1</sup>                        | 7,490            | 7,548            | 3,875            | 3,901            | 3,927            | 3,952            | 3,978            | 4,004            | 4,031            | 4,057            |
| 139% - 150% <sup>1</sup>                       | 287              | 289              | 149              | 149              | 150              | 151              | 152              | 153              | 154              | 155              |
| 151% - 200% <sup>1</sup>                       | 1,750            | 1,763            | 905              | 911              | 917              | 923              | 929              | 935              | 942              | 948              |
| 201% - 250%                                    | 410              | 413              | 212              | 213              | 215              | 216              | 218              | 219              | 220              | 222              |
| 251% - 300% <sup>2</sup>                       | 54,568           | 54,995           | 37,083           | 37,326           | 37,571           | 37,818           | 38,067           | 38,317           | 38,568           | 38,822           |
| 301% - 350% <sup>2</sup>                       | 40,274           | 40,589           | 27,369           | 27,548           | 27,729           | 27,912           | 28,095           | 28,279           | 28,465           | 28,652           |
| 351% - 400% <sup>2</sup>                       | 26,211           | 26,416           | 17,812           | 17,929           | 18,047           | 18,165           | 18,285           | 18,405           | 18,526           | 18,647           |
| 401% - 500% <sup>2</sup>                       | 21,637           | 21,807           | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| 501% - 600% <sup>2</sup>                       | 9,655            | 9,731            | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| Over 600% <sup>2</sup>                         | 6,641            | 6,693            | 0                | 0                | 0                | 0                | 0                | 0                | 0                | 0                |
| <b>Essential Plan Enrollment</b>               | <b>1,459,261</b> | <b>1,422,531</b> | <b>1,427,282</b> | <b>1,449,018</b> | <b>1,471,121</b> | <b>1,493,577</b> | <b>1,516,390</b> | <b>1,539,566</b> | <b>1,563,111</b> | <b>1,587,032</b> |
| Below 150%                                     | 793,673          | 761,752          | 767,788          | 780,121          | 792,666          | 805,412          | 818,363          | 831,523          | 844,894          | 858,481          |
| 151% - 200%                                    | 575,666          | 557,117          | 562,735          | 571,807          | 581,034          | 590,411          | 599,938          | 609,620          | 619,459          | 629,456          |
| Over 201%                                      | 89,922           | 103,662          | 96,760           | 97,090           | 97,421           | 97,754           | 98,088           | 98,423           | 98,759           | 99,096           |

<sup>1</sup> The decrease in enrollment from the WoW scenario (~0.4% in total) is due to the methodology for allocating estimated enrollment by income and does not reflect any changes in eligibility for this population that would cause consumers below 200% of FPL to lose coverage.

<sup>2</sup> There is an increase from the WoW scenario (~0.6% in total) for the on-exchange Unsubsidized and Subsidized population with incomes above 250% of the FPL. This is due to increased awareness, concentrated advertisement, and outreach activities with the implementation of the waiver.

Note: This table displays the With Waiver amounts as 9-month averages for 2024, since the first year of the waiver will only contain 9 months.

**Table C10. Without and With-Waiver Monthly Federal Funding PMPM by Metal Level and Rate Cohort, PY 2024 – 2033**

| <b>Without Waiver - Scenario C</b> | 2024         | 2025         | 2026         | 2027         | 2028         | 2029         | 2030           | 2031           | 2032           | 2033           |
|------------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|----------------|----------------|----------------|----------------|
| <b>Exchange Subsidized APTCs</b>   | \$314        | \$345        | \$325        | \$358        | \$394        | \$432        | \$472          | \$514          | \$559          | \$607          |
| Bronze                             | \$289        | \$313        | \$305        | \$331        | \$360        | \$389        | \$421          | \$454          | \$490          | \$527          |
| Silver                             | \$365        | \$398        | \$383        | \$418        | \$456        | \$496        | \$538          | \$583          | \$630          | \$681          |
| Gold                               | \$281        | \$317        | \$275        | \$315        | \$357        | \$403        | \$450          | \$501          | \$555          | \$613          |
| Platinum                           | \$237        | \$278        | \$216        | \$260        | \$308        | \$359        | \$413          | \$470          | \$531          | \$596          |
| <b>Essential Plan BHP Funding</b>  | <b>\$783</b> | <b>\$824</b> | <b>\$831</b> | <b>\$874</b> | <b>\$919</b> | <b>\$967</b> | <b>\$1,017</b> | <b>\$1,070</b> | <b>\$1,126</b> | <b>\$1,184</b> |
| EP1                                | \$704        | \$741        | \$711        | \$748        | \$786        | \$827        | \$870          | \$916          | \$963          | \$1,013        |
| EP2                                | \$771        | \$811        | \$809        | \$851        | \$896        | \$942        | \$991          | \$1,043        | \$1,097        | \$1,154        |
| EP3                                | \$835        | \$878        | \$915        | \$962        | \$1,012      | \$1,065      | \$1,120        | \$1,179        | \$1,240        | \$1,304        |
| EP4                                | \$862        | \$907        | \$951        | \$1,001      | \$1,053      | \$1,107      | \$1,165        | \$1,226        | \$1,289        | \$1,356        |
| <b>With Waiver - Scenario C</b>    | 2024         | 2025         | 2026         | 2027         | 2028         | 2029         | 2030           | 2031           | 2032           | 2033           |
| <b>Exchange Subsidized APTCs</b>   | \$314        | \$345        | \$325        | \$358        | \$394        | \$432        | \$472          | \$514          | \$559          | \$607          |
| Bronze                             | \$289        | \$313        | \$305        | \$331        | \$360        | \$389        | \$421          | \$454          | \$490          | \$527          |
| Silver                             | \$365        | \$398        | \$383        | \$418        | \$456        | \$496        | \$538          | \$583          | \$630          | \$681          |
| Gold                               | \$281        | \$317        | \$275        | \$315        | \$357        | \$403        | \$450          | \$501          | \$555          | \$613          |
| Platinum                           | \$237        | \$278        | \$216        | \$260        | \$308        | \$359        | \$413          | \$470          | \$531          | \$596          |
| <b>Essential Plan BHP Funding</b>  | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>   | <b>\$0</b>     | <b>\$0</b>     | <b>\$0</b>     | <b>\$0</b>     |
| EP1                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |
| EP2                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |
| EP3                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |
| EP4                                | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |
| QHP 200%-250% FPL Population       | \$0          | \$0          | \$0          | \$0          | \$0          | \$0          | \$0            | \$0            | \$0            | \$0            |

**Table C11. Without and With Waiver - 5-Year Enrollment, Premium, and Federal Deficit Estimates, PY 2024 – 2033**

| <b>Without Waiver - Scenario C</b>   | <b>2024</b> | <b>2025</b> | <b>2026</b> | <b>2027</b> | <b>2028</b> | <b>2029</b> | <b>2030</b> | <b>2031</b> | <b>2032</b> | <b>2033</b> |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| <i>Unsubsidized On-exchange &amp; Off-exchange Enrollment</i>                | 66,122      | 64,435      | 124,043     | 123,236     | 122,435     | 121,639     | 120,849     | 120,063     | 119,283     | 118,507     |
| Below 400%   | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| 401% - 500%  | 0           | 0           | 24,239      | 24,082      | 23,925      | 23,770      | 23,615      | 23,462      | 23,309      | 23,158      |
| 501% - 600%  | 0           | 0           | 12,400      | 12,319      | 12,239      | 12,159      | 12,080      | 12,002      | 11,924      | 11,846      |
| Over 600%  | 12,291      | 13,896      | 15,502      | 15,401      | 15,301      | 15,201      | 15,103      | 15,004      | 14,907      | 14,810      |
| Do Not Report  | 53,831      | 50,539      | 71,902      | 71,435      | 70,970      | 70,509      | 70,051      | 69,595      | 69,143      | 68,693      |
| <i>Unsubsidized On-exchange Enrollment</i>                                   | 16,531      | 16,109      | 74,426      | 73,942      | 73,461      | 72,984      | 72,509      | 72,038      | 71,570      | 71,104      |
| <i>Off-exchange Enrollment</i>   | 49,592      | 48,326      | 49,617      | 49,295      | 48,974      | 48,656      | 48,339      | 48,025      | 47,713      | 47,403      |
| <b>With Waiver - Scenario C</b>  | <b>2024</b> | <b>2025</b> | <b>2026</b> | <b>2027</b> | <b>2028</b> | <b>2029</b> | <b>2030</b> | <b>2031</b> | <b>2032</b> | <b>2033</b> |
| <i>Unsubsidized On-exchange &amp; Off-exchange Enrollment</i>                | 66,122      | 64,587      | 124,347     | 123,692     | 123,043     | 122,399     | 121,761     | 121,127     | 120,499     | 119,875     |
| Below 400%   | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           | 0           |
| 401% - 500%  | 0           | 0           | 24,299      | 24,171      | 24,044      | 23,918      | 23,793      | 23,670      | 23,547      | 23,425      |
| 501% - 600%  | 0           | 0           | 12,430      | 12,365      | 12,300      | 12,235      | 12,171      | 12,108      | 12,045      | 11,983      |
| Over 600%  | 12,314      | 13,927      | 15,540      | 15,458      | 15,377      | 15,296      | 15,217      | 15,137      | 15,059      | 14,981      |
| Do Not Report  | 53,808      | 50,660      | 72,078      | 71,699      | 71,323      | 70,949      | 70,579      | 70,212      | 69,848      | 69,486      |
| <i>Unsubsidized On-exchange &amp; Off-exchange Premium Increase (Annual)</i> | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |
| <i>Unsubsidized On-exchange Enrollment</i>                                   | 16,531      | 16,147      | 74,608      | 74,215      | 73,826      | 73,439      | 73,057      | 72,676      | 72,299      | 71,925      |
| <i>Unsubsidized On-exchange Premium Increase (Annual)</i>                    | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |
| <i>Off-exchange Enrollment</i>   | 49,592      | 48,440      | 49,739      | 49,477      | 49,217      | 48,960      | 48,704      | 48,451      | 48,200      | 47,950      |
| <i>Off-exchange Premium Increase (Annual)</i>                                | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |

Note: Due to IRIP, there are no expected increases of premiums for consumers that remain in the individual market compared to Without Waiver.

Note: There is an increase from the WoW scenario (~0.6% in total) for the on-exchange Unsubsidized and Subsidized population with incomes above 250% of the FPL. This is due to increased awareness, concentrated advertisement, and outreach activities with the implementation of the Waiver.

**Table C12. Without and With-Waiver Annual Out-of-Pocket Expenses by FPL, PY 2024 – 2033**

| <b>Without Waiver - Scenario C - FPL</b>                    | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | 2032    | 2033    | 5 Year  | 10 Year |
|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| <i>Exchange - Annual Out-of-Pocket Expenses - FPL</i>       |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 250%  | \$2,751 | \$2,895 | \$3,045 | \$3,203 | \$3,370 | \$3,545 | \$3,730 | \$3,923 | \$4,128 | \$4,342 | \$3,040 | \$3,481 |
| 251% - 300%   | \$2,643 | \$2,781 | \$2,925 | \$3,078 | \$3,238 | \$3,406 | \$3,583 | \$3,769 | \$3,965 | \$4,172 | \$2,898 | \$3,308 |
| 301% - 350%   | \$2,641 | \$2,778 | \$2,922 | \$3,074 | \$3,234 | \$3,402 | \$3,579 | \$3,766 | \$3,961 | \$4,167 | \$2,895 | \$3,304 |
| 351% - 400%   | \$2,653 | \$2,791 | \$2,936 | \$3,089 | \$3,250 | \$3,419 | \$3,596 | \$3,783 | \$3,980 | \$4,187 | \$2,909 | \$3,320 |
| 401% - 500%   | \$2,672 | \$2,811 | \$2,957 | \$3,111 | \$3,272 | \$3,442 | \$3,621 | \$3,810 | \$4,008 | \$4,216 | \$2,974 | \$3,399 |
| 501% - 600%   | \$2,686 | \$2,826 | \$2,973 | \$3,128 | \$3,290 | \$3,462 | \$3,642 | \$3,831 | \$4,030 | \$4,240 | \$3,002 | \$3,434 |
| Over 600%/Do Not Report                                     | \$2,742 | \$2,885 | \$3,034 | \$3,192 | \$3,358 | \$3,533 | \$3,717 | \$3,910 | \$4,113 | \$4,327 | \$3,058 | \$3,498 |
| <i>Essential Plan - Annual Out-of-Pocket Expenses - FPL</i> |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 150%  | \$9     | \$10    | \$10    | \$11    | \$11    | \$11    | \$12    | \$12    | \$13    | \$13    | \$10    | \$11    |
| Over 151%   | \$139   | \$145   | \$150   | \$156   | \$163   | \$169   | \$176   | \$183   | \$190   | \$198   | \$151   | \$168   |
| <b>With Waiver - Scenario C - FPL</b>                       | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | 2032    | 2033    | 5 Year  | 10 Year |
| <i>Exchange - Annual Out-of-Pocket Expenses - FPL</i>       |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 250%  | \$2,757 | \$2,901 | \$3,051 | \$3,210 | \$3,377 | \$3,553 | \$3,737 | \$3,932 | \$4,136 | \$4,351 | \$2,997 | \$3,403 |
| 251% - 300%   | \$2,648 | \$2,785 | \$2,930 | \$3,082 | \$3,243 | \$3,411 | \$3,589 | \$3,775 | \$3,972 | \$4,178 | \$2,903 | \$3,313 |
| 301% - 350%   | \$2,645 | \$2,782 | \$2,927 | \$3,079 | \$3,239 | \$3,408 | \$3,585 | \$3,771 | \$3,967 | \$4,174 | \$2,900 | \$3,310 |
| 351% - 400%   | \$2,657 | \$2,795 | \$2,941 | \$3,094 | \$3,255 | \$3,424 | \$3,602 | \$3,789 | \$3,986 | \$4,193 | \$2,914 | \$3,325 |
| 401% - 500%   | \$2,676 | \$2,815 | \$2,961 | \$3,115 | \$3,277 | \$3,448 | \$3,627 | \$3,816 | \$4,014 | \$4,223 | \$2,978 | \$3,405 |
| 501% - 600%   | \$2,691 | \$2,830 | \$2,978 | \$3,132 | \$3,295 | \$3,467 | \$3,647 | \$3,837 | \$4,036 | \$4,246 | \$3,006 | \$3,440 |
| Over 600%/Do Not Report                                     | \$2,746 | \$2,889 | \$3,039 | \$3,197 | \$3,363 | \$3,538 | \$3,722 | \$3,916 | \$4,119 | \$4,333 | \$3,063 | \$3,504 |
| <i>Essential Plan - Annual Out-of-Pocket Expenses - FPL</i> |         |         |         |         |         |         |         |         |         |         |         |         |
| Below 150%  | \$9     | \$10    | \$10    | \$11    | \$11    | \$11    | \$12    | \$12    | \$13    | \$13    | \$10    | \$11    |
| 151% - 200%   | \$139   | \$145   | \$150   | \$156   | \$163   | \$169   | \$176   | \$183   | \$190   | \$198   | \$151   | \$168   |
| Over 201%   | \$238   | \$247   | \$257   | \$267   | \$278   | \$289   | \$301   | \$313   | \$325   | \$338   | \$257   | \$286   |

**Table C13. Without and With-Waiver Annual Out-of-Pocket Expenses by Age, PY 2024 – 2033**

| <b>Without Waiver - Scenario C - Age</b>                    | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | 2032    | 2033    | 5 Year  | 10 Year |
|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| <b>Exchange - Annual Out-of-Pocket Expenses - Age</b>       |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$1,131 | \$1,190 | \$1,252 | \$1,317 | \$1,386 | \$1,458 | \$1,533 | \$1,613 | \$1,697 | \$1,785 | \$1,255 | \$1,436 |
| 21 - 25 Years   | \$1,126 | \$1,184 | \$1,246 | \$1,311 | \$1,379 | \$1,450 | \$1,526 | \$1,605 | \$1,689 | \$1,776 | \$1,249 | \$1,429 |
| 26 - 30 Years   | \$1,459 | \$1,534 | \$1,614 | \$1,698 | \$1,787 | \$1,879 | \$1,977 | \$2,080 | \$2,188 | \$2,302 | \$1,618 | \$1,852 |
| 31 - 35 Years   | \$1,783 | \$1,876 | \$1,973 | \$2,076 | \$2,184 | \$2,297 | \$2,417 | \$2,542 | \$2,675 | \$2,814 | \$1,978 | \$2,264 |
| 36 - 40 Years   | \$1,960 | \$2,062 | \$2,169 | \$2,282 | \$2,401 | \$2,526 | \$2,657 | \$2,795 | \$2,941 | \$3,094 | \$2,175 | \$2,489 |
| 41 - 45 Years   | \$2,186 | \$2,299 | \$2,419 | \$2,545 | \$2,677 | \$2,816 | \$2,963 | \$3,117 | \$3,279 | \$3,449 | \$2,425 | \$2,775 |
| 46 - 50 Years   | \$2,578 | \$2,712 | \$2,853 | \$3,001 | \$3,158 | \$3,322 | \$3,494 | \$3,676 | \$3,867 | \$4,068 | \$2,860 | \$3,273 |
| 51 - 55 Years   | \$3,180 | \$3,346 | \$3,520 | \$3,703 | \$3,895 | \$4,098 | \$4,311 | \$4,535 | \$4,771 | \$5,019 | \$3,529 | \$4,038 |
| 56 - 60 Years   | \$3,896 | \$4,098 | \$4,311 | \$4,536 | \$4,772 | \$5,020 | \$5,281 | \$5,555 | \$5,844 | \$6,148 | \$4,323 | \$4,946 |
| 61 - 65 Years   | \$4,802 | \$5,052 | \$5,315 | \$5,591 | \$5,882 | \$6,188 | \$6,509 | \$6,848 | \$7,204 | \$7,578 | \$5,328 | \$6,097 |
| <b>Essential Plan - Annual Out-of-Pocket Expenses - Age</b> |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$45    | \$47    | \$48    | \$50    | \$52    | \$54    | \$57    | \$59    | \$61    | \$64    | \$49    | \$54    |
| 21 - 25 Years   | \$45    | \$46    | \$48    | \$50    | \$52    | \$54    | \$56    | \$59    | \$61    | \$63    | \$48    | \$54    |
| 26 - 30 Years   | \$58    | \$60    | \$62    | \$65    | \$68    | \$70    | \$73    | \$76    | \$79    | \$82    | \$63    | \$69    |
| 31 - 35 Years   | \$71    | \$73    | \$76    | \$79    | \$83    | \$86    | \$89    | \$93    | \$97    | \$100   | \$76    | \$85    |
| 36 - 40 Years   | \$78    | \$81    | \$84    | \$87    | \$91    | \$94    | \$98    | \$102   | \$106   | \$110   | \$84    | \$93    |
| 41 - 45 Years   | \$87    | \$90    | \$94    | \$97    | \$101   | \$105   | \$109   | \$114   | \$118   | \$123   | \$94    | \$104   |
| 46 - 50 Years   | \$102   | \$106   | \$110   | \$115   | \$119   | \$124   | \$129   | \$134   | \$140   | \$145   | \$111   | \$123   |
| 51 - 55 Years   | \$126   | \$131   | \$136   | \$142   | \$147   | \$153   | \$159   | \$166   | \$172   | \$179   | \$136   | \$151   |
| 56 - 60 Years   | \$154   | \$160   | \$167   | \$174   | \$180   | \$188   | \$195   | \$203   | \$211   | \$220   | \$167   | \$185   |
| 61 - 65 Years   | \$190   | \$198   | \$206   | \$214   | \$222   | \$231   | \$241   | \$250   | \$260   | \$271   | \$206   | \$228   |
| <b>With Waiver - Scenario C - Age</b>                       |         |         |         |         |         |         |         |         |         |         |         |         |
| <b>Exchange - Annual Out-of-Pocket Expenses - Age</b>       |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$1,126 | \$1,185 | \$1,247 | \$1,312 | \$1,380 | \$1,451 | \$1,527 | \$1,606 | \$1,690 | \$1,778 | \$1,250 | \$1,430 |
| 21 - 25 Years   | \$1,121 | \$1,179 | \$1,240 | \$1,305 | \$1,373 | \$1,444 | \$1,519 | \$1,598 | \$1,681 | \$1,769 | \$1,244 | \$1,423 |
| 26 - 30 Years   | \$1,453 | \$1,528 | \$1,607 | \$1,691 | \$1,779 | \$1,872 | \$1,969 | \$2,071 | \$2,179 | \$2,292 | \$1,612 | \$1,844 |
| 31 - 35 Years   | \$1,775 | \$1,868 | \$1,965 | \$2,067 | \$2,175 | \$2,288 | \$2,407 | \$2,532 | \$2,663 | \$2,802 | \$1,970 | \$2,254 |
| 36 - 40 Years   | \$1,952 | \$2,054 | \$2,160 | \$2,273 | \$2,391 | \$2,515 | \$2,646 | \$2,784 | \$2,928 | \$3,081 | \$2,166 | \$2,478 |
| 41 - 45 Years   | \$2,176 | \$2,290 | \$2,409 | \$2,534 | \$2,666 | \$2,804 | \$2,950 | \$3,104 | \$3,265 | \$3,435 | \$2,415 | \$2,763 |
| 46 - 50 Years   | \$2,567 | \$2,701 | \$2,841 | \$2,989 | \$3,144 | \$3,308 | \$3,480 | \$3,661 | \$3,851 | \$4,051 | \$2,848 | \$3,259 |
| 51 - 55 Years   | \$3,167 | \$3,331 | \$3,505 | \$3,687 | \$3,879 | \$4,080 | \$4,293 | \$4,516 | \$4,751 | \$4,998 | \$3,514 | \$4,021 |
| 56 - 60 Years   | \$3,879 | \$4,081 | \$4,293 | \$4,517 | \$4,751 | \$4,999 | \$5,258 | \$5,532 | \$5,820 | \$6,122 | \$4,304 | \$4,925 |
| 61 - 65 Years   | \$4,782 | \$5,031 | \$5,292 | \$5,567 | \$5,857 | \$6,162 | \$6,482 | \$6,819 | \$7,174 | \$7,547 | \$5,306 | \$6,071 |
| <b>Essential Plan - Annual Out-of-Pocket Expenses - Age</b> |         |         |         |         |         |         |         |         |         |         |         |         |
| 00 - 20 Years   | \$49    | \$51    | \$53    | \$55    | \$57    | \$59    | \$62    | \$64    | \$67    | \$69    | \$53    | \$59    |
| 21 - 25 Years   | \$48    | \$50    | \$52    | \$55    | \$57    | \$59    | \$61    | \$64    | \$66    | \$69    | \$53    | \$58    |
| 26 - 30 Years   | \$63    | \$65    | \$68    | \$71    | \$74    | \$76    | \$80    | \$83    | \$86    | \$89    | \$68    | \$75    |
| 31 - 35 Years   | \$77    | \$80    | \$83    | \$86    | \$90    | \$93    | \$97    | \$101   | \$105   | \$109   | \$83    | \$92    |
| 36 - 40 Years   | \$84    | \$88    | \$91    | \$95    | \$99    | \$103   | \$107   | \$111   | \$116   | \$120   | \$91    | \$101   |
| 41 - 45 Years   | \$94    | \$98    | \$102   | \$106   | \$110   | \$115   | \$119   | \$124   | \$129   | \$134   | \$102   | \$113   |
| 46 - 50 Years   | \$111   | \$115   | \$120   | \$125   | \$130   | \$135   | \$141   | \$146   | \$152   | \$158   | \$120   | \$133   |
| 51 - 55 Years   | \$137   | \$142   | \$148   | \$154   | \$160   | \$167   | \$173   | \$180   | \$187   | \$195   | \$148   | \$164   |
| 56 - 60 Years   | \$168   | \$175   | \$182   | \$189   | \$196   | \$204   | \$212   | \$221   | \$230   | \$239   | \$182   | \$201   |
| 61 - 65 Years   | \$207   | \$215   | \$224   | \$233   | \$242   | \$252   | \$262   | \$272   | \$283   | \$294   | \$224   | \$248   |

**Table C14. Without and With-Waiver Annual Enrollment by Age, PY 2024 – 2033**

| Without Waiver - Scenario C - Age        | 2024      | 2025      | 2026      | 2027      | 2028      | 2029      | 2030      | 2031      | 2032      | 2033      | 5 Year    | 10 Year   |
|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| <b>Exchange - Enrollment - Age</b>       |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 302,692   | 302,094   | 273,412   | 273,592   | 273,784   | 273,988   | 274,203   | 274,430   | 274,670   | 274,920   | 285,115   | 279,779   |
| 00 - 20 Years                            | 22,981    | 22,874    | 21,009    | 21,004    | 21,000    | 20,998    | 20,996    | 20,995    | 20,994    | 20,995    | 21,774    | 21,385    |
| 21 - 25 Years                            | 16,810    | 16,768    | 15,221    | 15,228    | 15,236    | 15,245    | 15,254    | 15,264    | 15,275    | 15,286    | 15,853    | 15,559    |
| 26 - 30 Years                            | 25,800    | 25,777    | 23,186    | 23,210    | 23,235    | 23,261    | 23,288    | 23,316    | 23,345    | 23,375    | 24,242    | 23,779    |
| 31 - 35 Years                            | 26,063    | 26,058    | 23,350    | 23,380    | 23,410    | 23,442    | 23,474    | 23,508    | 23,542    | 23,578    | 24,452    | 23,981    |
| 36 - 40 Years                            | 23,972    | 23,964    | 21,493    | 21,519    | 21,546    | 21,574    | 21,603    | 21,632    | 21,663    | 21,695    | 22,499    | 22,066    |
| 41 - 45 Years                            | 23,948    | 23,932    | 21,501    | 21,525    | 21,550    | 21,575    | 21,602    | 21,629    | 21,658    | 21,687    | 22,491    | 22,061    |
| 46 - 50 Years                            | 26,738    | 26,708    | 24,057    | 24,079    | 24,103    | 24,128    | 24,154    | 24,181    | 24,209    | 24,238    | 25,137    | 24,660    |
| 51 - 55 Years                            | 34,911    | 34,845    | 31,520    | 31,542    | 31,565    | 31,589    | 31,615    | 31,642    | 31,671    | 31,701    | 32,876    | 32,260    |
| 56 - 60 Years                            | 47,162    | 47,035    | 42,742    | 42,759    | 42,779    | 42,800    | 42,824    | 42,849    | 42,876    | 42,904    | 44,495    | 43,673    |
| 61 - 65 Years                            | 49,962    | 49,797    | 45,402    | 45,412    | 45,423    | 45,437    | 45,453    | 45,470    | 45,490    | 45,511    | 47,199    | 46,336    |
| 65+ Years                                | 4,346     | 4,336     | 3,931     | 3,933     | 3,935     | 3,938     | 3,941     | 3,944     | 3,947     | 3,950     | 4,096     | 4,020     |
| <b>Essential Plan - Enrollment - Age</b> |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 1,365,381 | 1,307,461 | 1,317,042 | 1,338,169 | 1,359,656 | 1,381,489 | 1,403,672 | 1,426,211 | 1,449,113 | 1,472,382 | 1,337,542 | 1,382,057 |
| 00 - 20 Years                            | 22,968    | 21,994    | 22,155    | 22,511    | 22,872    | 23,239    | 23,612    | 23,992    | 24,377    | 24,768    | 22,500    | 23,249    |
| 21 - 25 Years                            | 133,178   | 127,528   | 128,463   | 130,524   | 132,620   | 134,749   | 136,913   | 139,111   | 141,345   | 143,615   | 130,463   | 134,805   |
| 26 - 30 Years                            | 185,132   | 177,279   | 178,578   | 181,442   | 184,356   | 187,316   | 190,324   | 193,380   | 196,485   | 199,640   | 181,357   | 187,393   |
| 31 - 35 Years                            | 174,980   | 167,557   | 168,785   | 171,492   | 174,246   | 177,044   | 179,887   | 182,775   | 185,710   | 188,692   | 171,412   | 177,117   |
| 36 - 40 Years                            | 164,741   | 157,753   | 158,909   | 161,458   | 164,051   | 166,685   | 169,362   | 172,081   | 174,844   | 177,652   | 161,382   | 166,754   |
| 41 - 45 Years                            | 158,981   | 152,237   | 153,353   | 155,812   | 158,314   | 160,857   | 163,439   | 166,064   | 168,730   | 171,440   | 155,739   | 160,923   |
| 46 - 50 Years                            | 149,534   | 143,191   | 144,240   | 146,554   | 148,907   | 151,298   | 153,727   | 156,196   | 158,704   | 161,252   | 146,485   | 151,360   |
| 51 - 55 Years                            | 143,638   | 137,545   | 138,553   | 140,775   | 143,036   | 145,332   | 147,666   | 150,037   | 152,446   | 154,894   | 140,709   | 145,392   |
| 56 - 60 Years                            | 136,399   | 130,613   | 131,570   | 133,680   | 135,827   | 138,008   | 140,224   | 142,475   | 144,763   | 147,088   | 133,618   | 138,065   |
| 61 - 65 Years                            | 95,830    | 91,765    | 92,437    | 93,920    | 95,428    | 96,961    | 98,518    | 100,100   | 101,707   | 103,340   | 93,876    | 97,001    |
| 65+ Years                                | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         |
| <b>With Waiver - Scenario C - Age</b>    |           |           |           |           |           |           |           |           |           |           |           |           |
| <b>Exchange - Enrollment - Age</b>       |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 235,044   | 234,830   | 211,752   | 211,671   | 211,599   | 211,537   | 211,485   | 211,440   | 211,405   | 211,378   | 220,979   | 216,214   |
| 00 - 20 Years                            | 20,741    | 20,670    | 18,946    | 18,940    | 18,934    | 18,930    | 18,926    | 18,922    | 18,920    | 18,918    | 19,646    | 19,285    |
| 21 - 25 Years                            | 12,419    | 12,397    | 11,228    | 11,217    | 11,208    | 11,198    | 11,189    | 11,181    | 11,173    | 11,166    | 11,694    | 11,438    |
| 26 - 30 Years                            | 16,894    | 16,898    | 15,099    | 15,083    | 15,067    | 15,052    | 15,037    | 15,024    | 15,011    | 14,998    | 15,808    | 15,416    |
| 31 - 35 Years                            | 18,804    | 18,828    | 16,740    | 16,738    | 16,736    | 16,735    | 16,735    | 16,735    | 16,736    | 16,738    | 17,569    | 17,152    |
| 36 - 40 Years                            | 17,352    | 17,371    | 15,466    | 15,463    | 15,460    | 15,459    | 15,458    | 15,457    | 15,458    | 15,459    | 16,222    | 15,840    |
| 41 - 45 Years                            | 17,652    | 17,664    | 15,767    | 15,764    | 15,761    | 15,760    | 15,758    | 15,758    | 15,758    | 15,759    | 16,522    | 16,140    |
| 46 - 50 Years                            | 20,384    | 20,387    | 18,265    | 18,262    | 18,260    | 18,258    | 18,257    | 18,257    | 18,258    | 18,260    | 19,112    | 18,685    |
| 51 - 55 Years                            | 27,411    | 27,390    | 24,680    | 24,673    | 24,667    | 24,663    | 24,659    | 24,657    | 24,655    | 24,655    | 25,764    | 25,211    |
| 56 - 60 Years                            | 38,281    | 38,217    | 34,634    | 34,622    | 34,611    | 34,601    | 34,593    | 34,586    | 34,581    | 34,577    | 36,073    | 35,330    |
| 61 - 65 Years                            | 40,741    | 40,645    | 36,989    | 36,969    | 36,950    | 36,933    | 36,918    | 36,904    | 36,892    | 36,881    | 38,459    | 37,682    |
| 65+ Years                                | 4,365     | 4,363     | 3,937     | 3,941     | 3,945     | 3,949     | 3,954     | 3,958     | 3,963     | 3,968     | 4,110     | 4,034     |
| <b>Essential Plan - Enrollment - Age</b> |           |           |           |           |           |           |           |           |           |           |           |           |
| Total Enrollment                         | 1,459,261 | 1,422,531 | 1,427,282 | 1,449,018 | 1,471,121 | 1,493,577 | 1,516,390 | 1,539,566 | 1,563,111 | 1,587,032 | 1,445,843 | 1,492,889 |
| 00 - 20 Years                            | 25,962    | 25,818    | 25,906    | 26,295    | 26,691    | 27,092    | 27,501    | 27,915    | 28,336    | 28,765    | 26,135    | 27,028    |
| 21 - 25 Years                            | 140,480   | 137,692   | 138,600   | 140,737   | 142,909   | 145,116   | 147,359   | 149,638   | 151,953   | 154,306   | 140,084   | 144,879   |
| 26 - 30 Years                            | 198,145   | 194,351   | 195,349   | 198,337   | 201,375   | 204,462   | 207,598   | 210,785   | 214,022   | 217,312   | 197,511   | 204,174   |
| 31 - 35 Years                            | 186,160   | 182,629   | 183,703   | 186,523   | 189,390   | 192,304   | 195,264   | 198,271   | 201,327   | 204,432   | 185,681   | 192,000   |
| 36 - 40 Years                            | 174,542   | 170,231   | 171,000   | 173,618   | 176,281   | 178,986   | 181,734   | 184,527   | 187,364   | 190,246   | 173,134   | 178,853   |
| 41 - 45 Years                            | 167,922   | 162,938   | 163,467   | 165,963   | 168,502   | 171,082   | 173,702   | 176,365   | 179,069   | 181,817   | 165,758   | 171,083   |
| 46 - 50 Years                            | 158,293   | 153,409   | 153,808   | 156,152   | 158,536   | 160,957   | 163,417   | 165,916   | 168,455   | 171,034   | 156,040   | 160,998   |
| 51 - 55 Years                            | 153,479   | 148,778   | 149,012   | 151,271   | 153,568   | 155,901   | 158,272   | 160,680   | 163,126   | 165,611   | 151,222   | 155,970   |
| 56 - 60 Years                            | 147,559   | 143,096   | 143,133   | 145,287   | 147,479   | 149,704   | 151,965   | 154,262   | 156,595   | 158,965   | 145,311   | 149,804   |
| 61 - 65 Years                            | 106,719   | 103,589   | 103,304   | 104,835   | 106,391   | 107,971   | 109,577   | 111,207   | 112,864   | 114,546   | 104,967   | 108,100   |
| 65+ Years                                | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         | -         |