



Tribal Hearing for Draft 1332 Waiver Application

Oklahoma Insurance Department

October 22, 2026

Today's Agenda

#	Topic
1	Welcome and Instructions
2	Draft 1332 Waiver Overview
3	Open for Public Comments
4	Closing and Resources

Welcome and Instructions for Public Comment

In-Person Comments



After providing an overview of the draft waiver, in-person comments will be received based on the order listed on the sign-in sheet.

1. When called upon, please **come to the podium.**
2. State your name and organization before beginning your comment.

Virtual Comments



After in-person comments, the hearing will be open to any virtual comments will be received based on the order in which attendees registered.

1. When called upon, the host will move you to the virtual podium.
2. Please **unmute your mic.**
3. State your name and organization before beginning your comment.

Additional Comments

If you want to provide comment, but did not previously register, write your name in the Q&A and we will call on you after the other speakers.

Timing

Speakers are asked to limit their comments to **two (2) minutes** to allow all interested persons an opportunity to be heard during the hearing.

Draft 1332 Waiver Overview

Oklahoma's Market Overview & State Authority

Current Market Dynamics

Since the beginning of the Affordable Care Act (ACA), Oklahoma's individual health insurance market has experienced significant instability. Today, declining enrollment, high premiums, and limited insurance company participation across the State continue to undermine access to affordable coverage.

- **Enrollment has declined approximately 30%** from December 2025 to August 2026.
- **Average premiums have increased 17%** from 2025 to 2026, with an additional 16.5% increase estimated for 2027.
- **Consumers are shifting toward Bronze plans**, which offer lower premiums but higher out-of-pocket costs.
- **Two insurance companies will no longer offer plans** in Oklahoma for 2027.
- **36 Oklahoma counties (47%) will have only one or two insurance companies** offering plans through Healthcare.gov for 2027.

State Authority

Oklahoma House Bill 1512 was signed into law on May 15, 2025, providing the Oklahoma Insurance Commissioner the **authority to apply for a waiver** pursuant to Section 1332 of the ACA.

About 1332 State Innovation Waivers

Section 1332 of the Affordable Care Act (ACA)

States may request to waive parts of the ACA to pursue innovative strategies for providing residents with access to high quality, affordable health insurance while retaining consumer protections.

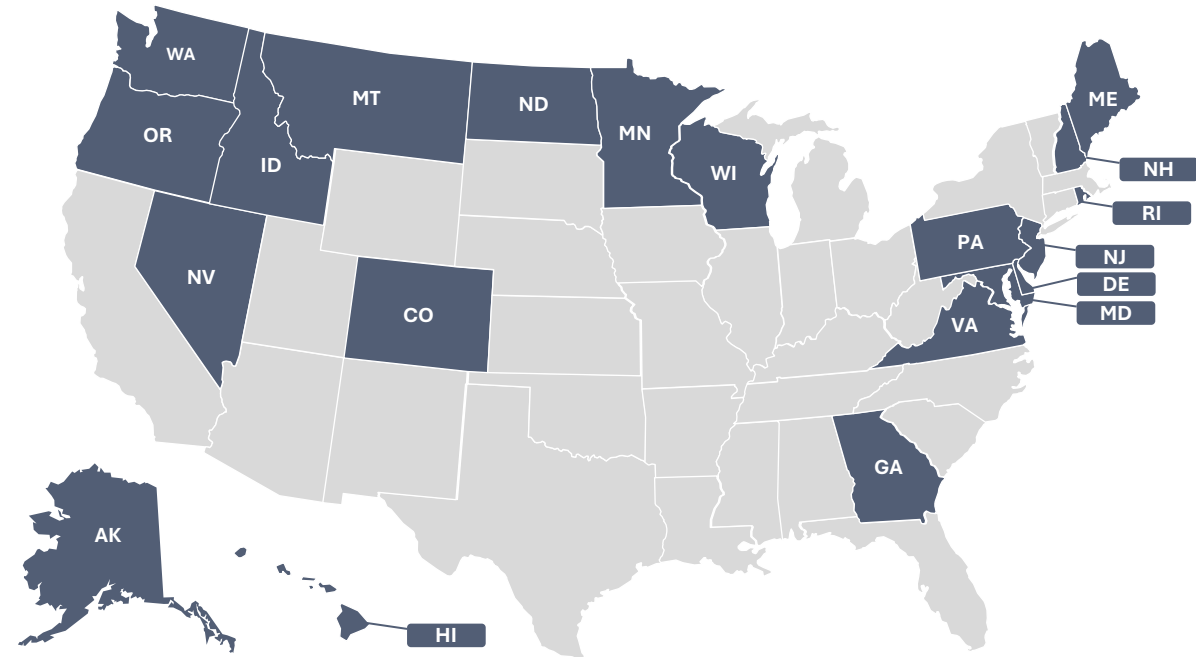
Federal Approval

The U.S. Department of Health & Human Services and U.S. Department of Treasury review and approve 1332 Waivers. Waivers may be authorized for up to 5 years, with options to renew.

Federal Funding

States may request to redirect federal savings from the waiver to the State to administer the program (known as “pass-through funding”).

20 States have Approved and Operational 1332 Waivers



18 states have implemented Reinsurance Programs through 1332 Waivers to stabilize their ACA markets

1332 Waiver Guardrails

For the federal government to approve a 1332 Waiver, the State must include an actuarial and economic analysis demonstrating that the changes under the waiver comply with **four statutory guardrails**.

1

Coverage

Provide coverage to a comparable number of consumers as without the waiver.

2

Comprehensiveness

Provide coverage for consumers at least as comprehensive as without the waiver.

3

Affordability

Provide coverage at least as affordable for consumers as without the waiver.

4

Deficit Neutrality

Not increase the federal deficit.

Oklahoma's Draft 1332 Waiver

Oklahoma's Proposed Waiver

Reinsurance Program



- Offsets the risk of high-cost claims for issuers which results in **lower premiums for consumers**.
- **Stabilizes** the market through a parameter-based reinsurance model.
- **Improves affordability** and **stabilizes the market**, especially in rural, high-cost regions.

Oklahoma's Waiver Goals



The goals are to **improve affordability**, **increase competition**, and **expand access** to healthcare coverage for residents.

Funding

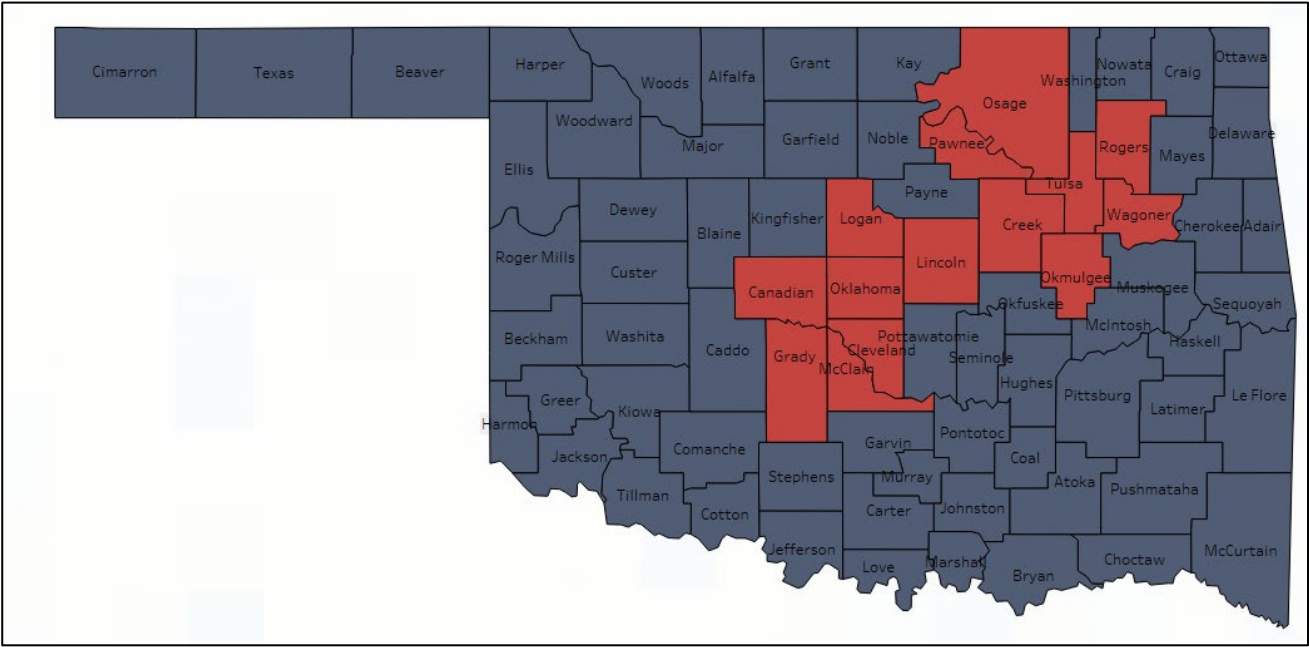


The waiver will be funded primarily through **Federal Pass-Through dollars** with some state funding from **Exchange User Fees**.

Two-Tiered Reinsurance Approach

Oklahoma is proposing a **tiered reinsurance program** that groups the State’s five rating areas and associated counties into a higher cost and lower cost tier.

A **rating area** is a specific geographic boundary used by health insurance companies to set and adjust health insurance premium rates under the ACA.



Reinsurance Tier	Rating Areas	Counties
Tier 1 <i>(Higher-Cost Regions)</i>	1, 2, 5	Le Flore, Sequoyah, Comanche, Adair, Alfalfa, Atoka, Beaver, Beckham, Blaine, Bryan, Caddo, Carter, Cherokee, Choctaw, Cimarron, Coal, Cotton, Craig, Custer, Delaware, Dewey, Ellis, Garfield, Garvin, Grant, Greer, Harmon, Harper, Haskell, Hughes, Jackson, Jefferson, Johnston, Kay, Kingfisher, Kiowa, Latimer, Love, Major, Marshall, Mayes, McCurtain, McIntosh, Murray, Muskogee, Noble, Nowata, Okfuskee, Ottawa, Payne, Pittsburg, Pontotoc, Pottawatomie, Pushmataha, Roger Mills, Seminole, Stephens, Texas, Tillman, Washington, Washita, Woods, Woodward
Tier 2 <i>(Lower-Cost Regions)</i>	3, 4	Canadian, Cleveland, Grady, Lincoln, Logan, McClain, Oklahoma, Creek, Okmulgee, Osage, Pawnee, Rogers, Tulsa, Wagoner

Proposed Reinsurance Parameters and Estimated Impacts

Reinsurance Parameters	2028	2029	2030	2031	2032	Total
Attachment Point	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000	-
Coinsurance Rate						
Rating Area 1	50%	50%	75%	75%	75%	-
Rating Area 2	50%	50%	75%	75%	75%	-
Rating Area 3	0%	0%	0%	0%	0%	-
Rating Area 4	0%	0%	0%	0%	0%	-
Rating Area 5	50%	50%	75%	75%	75%	-
Cap	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	-

Estimated Avg. Premium Impact	2028	2029	2030	2031	2032	Total
Rating Area 1	-9.4%	-9.5%	-14.3%	-14.4%	-14.5%	-12.4%
Rating Area 2	-9.3%	-9.3%	-14.0%	-14.0%	-14.0%	-12.1%
Rating Area 3	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Rating Area 4	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Rating Area 5	-9.7%	-9.7%	-14.5%	-14.6%	-14.6%	-12.6%
Total	-4.1%	-4.1%	-6.2%	-6.2%	-6.2%	-5.4%

The proposed parameters aim to bring rural premiums more in line with urban areas, advancing Oklahoma's goal of improving affordable coverage statewide and creating incentives for issuers to expand coverage.

Impacts on Tribal Communities



Rural Affordability & Market Competition

Reinsurance will help lower premiums and create incentives for issuers to expand coverage options in rural Tribal service areas that have historically faced higher costs and fewer participating issuers.



Increased Tribal Health System Revenue

Increased marketplace enrollment among Tribal members may lead to more billable revenue flowing back into Tribal health systems.



Reduced Uncompensated Care

Reinsurance can help reduce uncompensated care by improving affordability of coverage, which can ease financial pressure on Tribal health systems, Urban Indian Health Programs, and IHS facilities.



Stronger Referral Networks & Specialty Access

Stabilizing the individual market broadly can strengthen referral networks and specialty care access that Tribal health systems rely on for services that are not provided internally.

Open for Public Comments

Instructions for Public Comment

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Closing and Resources

Closing and Resources

- OID has a dedicated 1332 Waiver webpage with resources and updates: <https://www.oid.ok.gov/ohim-oklahoma-1332-state-innovation-waiver/>
- The Draft 1332 Waiver is available at: <https://www.oid.ok.gov/wp-content/uploads/2026/09/Draft-Oklahoma-1332-Waiver-Application-October-1-2026.pdf>
- The State is accepting comments through **October 31, 2026**.
 - All comments received will be reviewed and considered before Oklahoma submits its final application to the federal government.
 - Comments may be emailed to: 1332waiver@oid.ok.gov
 - Comments may be mailed to the following address and must be received by October 31, 2026:

Oklahoma Insurance Department
Attn: State Based Exchange / 1332 Waiver
400 NE 50th Street, Oklahoma City, OK 73105