To: Paid Leave Commission
From: Paid Leave for Maine Coalition
Date: September 9, 2022
RE: The Impacts of Program Design on Benefits and Costs, as Highlighted by the Milliman Actuarial Study

The [Maine Paid Leave Coalition](#) is grateful to the Commission to Develop a Maine Paid Family and Medical Leave Benefits Program for sharing the recently completed actuarial analysis of potential benefit programs by Milliman. The study clearly demonstrates the overall feasibility of creating a benefits program in Maine, with solid and defensible calculations to estimate the potential costs of a paid family and medical leave program.

When viewed side by side with the modeling completed by Myall & Milli (attached), this report highlights the impacts of program design on both the benefits generated and costs associated with establishing a paid family medical leave benefits program in Maine. The Coalition urges the Commission to strongly consider the differences between the two analyses and the positive impacts a graduated benefit structure can have on allowing for more generous benefits for low- and moderate-income Mainers, and greater usage overall, while enhancing the equity of the program.

The Milliman analysis does vary from the modelling completed by Myall & Milli for Paid Leave for ME in a few respects:

Data sources. The Myall & Milli analysis is based on Worker Paid Leave Usage Simulation (Worker PLUS) model developed by the Institute for Women's Policy Research and IMPAQ International for the U.S. Department of Labor. The Worker PLUS model is based on Census Bureau data for the period 2014-2018. Myall & Milli did make some adjustments to account for increased wage rates since then, but the Milliman analysis had access to the most current demographic and employment data from Maine Department of Labor. This likely only has a small impact on the results but the Milliman analysis may more accurately reflect a shift in labor market patterns away from low-wage service sectors such as hospitality in the past year.

Usage assumptions. The Myall & Milli analysis bases its usage rates on the experience of Rhode Island's PFML program, which has the highest usage rate of any existing state program. This was a deliberate choice so as not to underestimate the cost of the program. The Milliman report does not explain in detail how they arrive at their usage rate assumptions, but they are generally lower than those in the Myall & Milli analysis. Milliman may have taken the average experience of existing PFML plans in the states, rather than the conservative usage estimate used by Myall & Milli.

Benefit design. The Commission asked Milliman to analyze the costs of PFML plans which offer a flat wage replacement rate to participants, ranging from 80 to 100 percent of usual wages earned. In contrast, the Myall & Milli analysis is based on a proposal which offers a graduated rate of wage replacement. Low-income workers would receive 90 percent of their usual weekly wage, with replacement rates tapering off above half the statewide average weekly wage. Weekly benefits would also be capped at the statewide average weekly wage, around $1,000 a week. As a result, the overall *average* wage replacement rate for the policy analyzed by Myall & Milli is approximately 70 percent.

The flat-rate benefit proposed by the commission makes it difficult to provide an equitable policy at a sustainable cost. Allowing even the highest earners to receive 80-100 percent of their usual earnings requires low earners to pay higher payroll taxes to subsidize the benefits of high earners.

Other differences. The proposal analyzed by Myall & Milli includes some other elements not considered by the Commission. Namely, the proposal analyzed by Myall & Milli includes up to 16 weeks of paid leave if a worker has multiple leave needs in a calendar year. It also includes recently-unemployed workers in its eligibility criteria.

Detailed policy comparison

If we adjust the Myall & Milli proposal's usage rates to those predicted by Milliman, the Myall & Milli proposal provides a more generous benefit to most workers at a smaller cost than the flat-rate proposals explored by the commission. The closest Commission options to the Myall & Milli proposal are Options 4 and 5. When fully-phased in, both options have an estimated use rate of just under 46,000 claims per year. By contrast, Myall & Milli estimated just over 63,000 family and medical leave claims[12]

As a rough approximation to demonstrate how much more expensive the flat benefit approach is, it's possible to adjust a simplified the Myall & Milli analysis to account for a smaller number of claims. This simplified version excludes safe leave and leave for the recently-unemployed, and ignores the Myall & Milli proposal to exclude Maine's smallest employers from making employer contributions. [3][OBJ] - far less than the 0.87% total rate required for Commission Option 4, while providing a longer length of leave (up to 16 weeks in some situations).

Some examples will show that the Myall & Milli [45]

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[2] Not including the additional safe leave claims and claims among recently-unemployed workers who are additionally eligible under the Myall & Milli proposal.

[3] Estimate derived from the existing cost of family and medical leaves in Myall & Milli ($177.8 million), divided by 63,000 claims and multiplied by the new claim number (46,000). This figure ($124.2 million) was then multiplied by 105% to account for administrative costs, and added to the annual bond repayment figure. This produces a cost of $137 million in 2018 dollars. Applying this cost to the 2018 tax base of $27.8 billion produces a total payroll tax rate of 0.49%

[5] Under the Myall & Milli proposal, claimants receive 90% of their wages up to 50% of the statewide average weekly wage, plus 65% of their wages above this amount, with a maximum benefit capped at the statewide average weekly wage. In 2022, the statewide average weekly wage is $1,036, so beneficiaries get 90% of the first $518 of their usual earnings, plus 65% of earnings above that, with a maximum benefit of $1,036.

Example 1: A single parent working 20 hours a week as a waitress at $15 per hour. She earns $15,600 a year, or $300 a week. Under Commission Option 4, her benefit while on leave is $240 a week, and her portion of the weekly payroll tax is $1.31.

Under the Myall & Milli proposal, her benefit would be $270 per week and her portion of the weekly payroll tax would be $0.74

Example 2: A highway maintenance worker who works full-time at $21 per hour. He earns $43,680 a year, or $840 a week. Under Commission Option 4, his weekly benefit would be $672 and his portion of the weekly payroll tax would be $3.65

Under the Myall & Milli proposal, his benefit would be $675 per week and his portion of the weekly payroll tax would be $2.06

Example 3: A CEO who works full time at an equivalent hourly rate of $60 per hour. She earns $124,800 a year, or $2,400 a week. Under Commission Option 4, her weekly benefit would be $1,920 and her portion of the weekly payroll tax would be $10.44.

 Under the Myall & Milli policy, her benefit would be the maximum of $1,036 per week and her weekly payroll tax would be $5.88.

The lower-income worker pays more tax under Option 4 and receives a slightly smaller benefit. The middle-income worker receives an almost identical benefit, but pays a higher payroll tax under option 4. Only the high-income worker is better off under Option 4, with her payroll tax increasing alongside her weekly benefit.

Conclusion. Although there are places where the two estimates differ, they both point to the viability and sustainability of a statewide paid family and medical leave program. We are pleased to see this report and are happy to continue this conversation and to answer any questions you may have about our analysis. Thank you for your work, we look forward to the next steps with the Commission.

Paid Family and Medical Leave Insurance: Model-Based Estimates of Worker Usage and Costs in Maine

Prepared by James Myall, MA, Economic Policy Analyst, Maine Center for Economic Policy and Jessica Milli, PhD, Founder and Principal, Research 2 Impact

Paid family and medical leave insurance programs have been gaining increased attention in recent years, with nine states and the District of Columbia having passed laws establishing programs at the state level to date.[1] Voters in Maine could be asked whether they support the adoption of a paid family and medical leave insurance program through a ballot initiative as soon as November 2023.

The Maine Center for Economic Policy and Research 2 Impact analyzed the program currently under consideration in the state to estimate annual usage and costs as well as determine the premium level required to ensure that the program is self-sustainable. This brief presents the results of this analysis. It utilizes the Worker Paid Leave Usage Simulation (Worker PLUS) model, developed by the Institute for Women's Policy Research and IMPAQ International for the U.S. Department of Labor which simulates leave-taking behavior onto the Maine workforce using data from the Census Bureau's 2014-2018 American Community Survey. Additional data from a variety of publicly-available government sources and published academic research was used to estimate the additional costs and benefits associated with providing safe leave, bereavement leave, and providing benefits for otherwise eligible recently unemployed individuals.

Policy Parameters

The estimates presented in this brief are based on the following policy parameters:

- **Maximum Leave Length:** Up to 12 weeks of new child bonding leave, family caregiving, own health, and safe leave; individuals with more than one qualifying event in a year may take up to a total of 16 weeks of leave.
- **Wage Replacement Rate:** 90% of weekly earnings up to 50% of the statewide average weekly wage, and 65% on earnings beyond that level, up to a maximum of the statewide average weekly wage[2]
- **Covered Workers:** Private Sector, State and Local Government, and Self-Employed Workers
- **Worker Eligibility:** $5,141 in earnings in the past 12 months; recently unemployed individuals (less than 26 weeks unemployed) are also covered, provided they meet the other eligibility criteria
- **Revenue Base:** Total wages of eligible workers[3]

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[1] A Better Balance, "Comparative Chart of Paid Family and Medical Leave Laws in the United States" (New York, NY: A Better Balance, January 31, 2022), https://www.abetterbalance.org/resources/paid-family-leave-laws-chart/.

[2] In 2018, the year the data utilized in this analysis represents, the average weekly wage was $857 in the state, and 50% of the average weekly wage was $428.

[3] Estimates were also run in which the revenue base is capped at the Social Security taxable income limit.

- **Premium Payments:** 50/50 split between workers and employers[4]

Summary of Model Estimates

The results of the model are presented in Table 1. We estimate that a total of 64,456 leaves will be taken through the program in a given year. The majority of these will be for workers' own health conditions, though a significant share will also be needed by parents of new children (20 percent).

The average length of leaves needed is estimated to range from a low of 1.7 weeks for safe leave, to a high of 7.4 weeks for parental leaves. The average weekly benefit for leaves taken under the proposed program is estimated to be $489.

Table 1. Cost Estimates for Implementing a Paid Family and Medical Leave Insurance Program in the State of Maine

Number of Leaves Taken and Receiving Program Benefits	
Own Health Condition	43,518
Maternity/Parental	14,965
Family Care	4,653
Safe Leave	8,305
Leaves Among the Recently Unemployed	3,014
Total	74,456
Average Leave Length	
Own Health Condition	6.2
Maternity/Parental	7.4
Family Care	4.5
Safe Leave	1.7
Leaves Among the Recently Unemployed	5.3
Average Weekly Benefit	$489
Benefit Cost ($ Millions)	$192.4
Own Health Condition	$123.9
Maternity/Parental	$44.2
Family Care	$9.7
Safe Leave	$6.9
Leaves Among the Recently Unemployed	$7.8
Administrative Cost (5 percent, $ Millions)	$9.6
Repayment of Bond for Startup Costs	$6.8
Total Cost ($ Millions)	$208.8
Estimated Total Premium	
Cost as a Percent of Total Earnings	0.72%
Cost as a Percent of Social Security Wages	0.75%
Cost as a Percent of Social Security Wages, Employers Under 10 Employees Exempt	0.79%
Cost as a Percent of Social Security Wages, Employers Under 15 Employees Exempt	0.81%

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[4] Estimates were also run in which small businesses of varying sizes were exempt from paying the employer share of the premium.

Overall, the proposed paid family leave insurance program is estimated to pay out a total of $192.4 million in benefits per year. Based on program data from California, New Jersey, and Rhode Island, we assume 5 percent of benefit costs to cover program administration, which brings the total program costs to $202.0 million per year. Finally, we estimate that it will cost $6.8 million per year over 10 years to repay the $50 million bond used to finance program startup costs, bringing the total program costs to $208.8 million per year. Relative to the total wages of eligible workers, total program costs are 0.72 percent. This ratio increases slightly to 0.75 percent when compared with Social Security taxable wages. Finally, when small businesses are exempt from paying the employer share of the premium, the ratio increases to 0.79 percent (businesses with fewer than 10 employees exempt) and to 0.81 percent (businesses with fewer than 15 employees exempt).

Methodology

Estimating Leaves Needed by Type and Associated Costs

Estimates of the need for parental, caregiving, and own health leaves and their associated costs are based on results from the Worker Paid Leave Usage Simulation (Worker PLUS) model developed by the Institute for Women's Policy Research and IMPAQ International for the U.S. Department of labor.[5]

This simulation model makes use of two publicly-available government data sources—the 2018 FMLA survey and the 2014-2018 American Community Survey (ACS)—to estimate how workers would respond to a proposed program. It specifically uses the FMLA data to build behavioral models that describe how workers make decisions about whether to take a leave, how long of a leave to take, whether they would extend their leave if any/more benefits were available, and so on. Because of the relatively small sample size of the FMLA data and its lack of detailed geographic information on respondents, the simulation model runs the much larger ACS sample (in this case, the sample of eligible Maine workers) through these behavioral models to estimate workers' likelihood of needing and taking a leave.

The Worker PLUS model was calibrated using the policy parameters detailed above and assumes worker take-up rates will be similar to take-up rates observed in Rhode Island's program.

For more information on the Worker PLUS model, see Hartman and Hayes (2021).[6]

The Worker PLUS model is not able to account for more complex policy scenarios, such as the provision in the Maine bill which allows individuals with multiple qualifying events in a year to take up to 16 weeks

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[5] U.S. Department of Labor, "Microsimulation Model on Worker Leave," 2021, https://www.dol.gov/agencies/oasp/evaluation/completedstudies/Microsimulation-Model-on-Worker-Leave.

[6] Heidi I. Hartmann and Jeffrey Hayes, "Estimating Benefits: Proposed National Paid Family and Medical Leave Programs," *Contemporary Economic Policy* 39, no. 3 (2021): 537–56, https://doi.org/10.1111/coep.12526.

of leave (instead of 12 weeks). To account for this, we conducted a post-analysis of the simulation model output.

The first part of this analysis involved estimating the number of workers who were already taking at least two types of leave, but may have taken longer leaves if they had access to more paid leave in total. We estimate that just under 8,000 workers would use the program to take two ore more leaves without access to additional leave. Leave lengths for each type of leave were individually lower than average among this group. For simplicity, we assume that if they were given access to an additional 4 weeks of leave, workers would take leaves equal to the average length among those only taking one type of leave (subject to the limitation that total leave taken not exceed 16 weeks). In most cases, this increased the average leave length by less than a week. We then combined our estimates of the number of workers affected with our estimates of increases in leave length and the model-based estimates of average weekly benefit to estimate the total increase in cost associated with providing additional leave for workers taking at least two types of leave.

The second part of this analysis involved estimating the number of workers who needed at least two types of leave, but did not take at least one and may have taken the other(s) if they had access to more paid leave in total. We estimate that approximately 5,000 workers fall into this category. We assign the average leave length for the relevant type of leave to these workers (who previously had a leave length of 0, again, subject to the limitation that total leave taken not exceed 16 weeks). As with the case of workers extending leaves, we combined our estimates of the number of new leaves taken with the average leave length and average weekly benefit to estimate the total increase in cost associated with new leaves that would be taken if additional leave was provided.

These are simplifying assumptions, of course, and assume that all workers would avail themselves of the newly available leave. There is a lack of data available to make reasonable assumptions about which workers would take additional leave if it were available to them. As such, we opted for a conservative approach which is likely an overestimate of the additional costs associated with providing additional leave in this case.

Average Weekly Benefit

Estimates of the average weekly benefit paid by the program are calculated using output data from the Worker PLUS model. We first estimate the average leave length covered by the program by type of leave from the model output data. We then divide the model-estimated total benefit cost by leave type by the product of the average leave length (in weeks) and the model-estimated number of leaves taken to estimate the average weekly benefit by type of leave. Finally, a weighted average weekly benefit was calculated across leave types, using the number of leaves taken as weights.

Though benefit amounts are indexed to the average weekly wage, the average weekly benefit may be lower than expected for a number of reasons. First, the average weekly benefit paid to someone earning the average weekly wage would be $665.18. About 53.2 percent of year-round workers have weekly wages below this level, which means that the average benefit should skew lower than this, all else equal. Second, in order to earn the maximum benefit, an individual would need to earn at least $1,153.65 per week. Three quarters of the Maine workforce has weekly wages below this value, which again skews the average benefit lower, all else equal. Finally, it is possible that lower-wage workers need more leaves in a given year and would take them if they had access to paid leave benefits. There is a

well-documented link between income and health,[7] suggesting that lower-income workers may be more likely to need own health leaves or leaves to care for sick family members. Further, birth rates tend to be higher among lower-income households,[8] meaning that lower-income workers may also be more likely to need new child leaves. Higher rates of leave-taking among low-income workers would also drive down the estimated average weekly benefit, all else equal.

Safe Leave

Because of its sensitive nature and tendency towards underreporting, reliable and timely data on domestic violence is difficult to come by, making estimates of the anticipated costs associated with safe leave particularly difficult to produce. For this analysis, we use data from the National Center for Injury Prevention and Control, which finds that in 2015 approximately 5.5 percent of U.S. adult women and 5.2 percent of U.S. adult men had been nonfatally victimized by an intimate partner in the last 12 months, with variations in prevalence by type of violence experienced.[9] Additional data from the National Center for Injury Prevention and Control finds that 17.5 percent to 35.3 percent of victims of intimate partner violence missed at least one day of paid work, with the average days of paid work lost ranging from 7.2 days to 10.1 days depending on the type of violence experienced. This data was only available for women, however, so we assume that similar rates will apply to victimized men.[10]

We apply the rates of victimization of different types of intimate partner violence (stalking, rape, and physical violence) by gender and the shares of victims missing any work to the Maine adult population to estimate the number of domestic violence victims missing any work in a given year. These estimates were then multiplied by the overall program take-up rate among workers experiencing a qualifying leave need calculated through the Worker PLUS model (this is estimated at 49 percent) to get the number of victims expected to utilize the program to take safe leave. Finally, these estimates were then multiplied by the average number of weeks missed (days missed divided by 5) and the average weekly benefit to estimate the total cost of providing safe leave to victims of intimate partner violence.

These estimates likely overestimate the number of safe leaves that will be taken through the program, as victims of domestic violence may be hesitant to claim program benefits. Because of this, our estimates of the total cost of the program and subsequent premium calculations may also be slightly overestimated. This should result in a surplus of revenue to fund the program, however, which can be adjusted once actual program data on usage are available.

Leave for Recently Unemployed Persons

Because the Worker PLUS does not account for bereavement or safe leave and does not allow unemployed workers to receive benefits, we first calculated the total cost of benefits for all eligible leave reasons. This total cost was then divided by the total eligible workforce to get an average cost per

[7] Khullar, Dhruv and Dave A. Chokshi, "Health, Income, & Poverty: Where We Are & What Could Help" (*Health Affairs*, 2018), https://www.healthaffairs.org/do/10.1377/hpb20180817.901935/.

[8] Statista, "Birth rate in the United States in 2017, by household income," (2022), https://www.statista.com/statistics/241530/birth-rate-by-family-income-in-the-us/.

[9] Sharon G. Smith et al., "The National Intimate Partner and Sexual Violence Survey: 2015 Data Brief — Updated Release" (Atlanta, GA: National Center for Injury Prevention and Control, November 2018), https://www.cdc.gov/violenceprevention/pdf/2015data-brief508.pdf.

[10] Julie L. Gerberding et al., "Costs of Intimate Partner Violence Against Women in the United States" (Atlanta, GA: Centers for Disease Control and Prevention, 2003), https://www.cdc.gov/violenceprevention/pdf/ipvbook-a.pdf.

person. This average cost takes into account variations in whether leave was taken and leave length (if taken). Applying this average cost to the total number of individuals in the state who have been unemployed for less than 26 weeks (about 23,000 per year on average in Maine) from an analysis of the 2015-2019 Current Population Survey Annual Social and Economic Supplement (CPS ASEC),[11] allows us to estimate the cost of providing leave to otherwise eligible recently unemployed persons.

Bonding for Startup Costs

In addition to the costs of worker benefits paid through the program, the program will also require an initial investment to get the program up and running. These startup costs can include salaries for program management and planning staff, IT (including hardware, software, and programming), claims processing and review staff (typically hired at the end of the start-up period for training), program outreach, and other expenses such as office space, computers, phone lines, etc. Previous fiscal notes and feasibility studies conducted in other states estimate a wide range of total program start-up costs, from $5.4 million in Vermont to $60.0 million in Minnesota.[12] Based on this information, we opted for a more conservative estimate of $50 million to get the Maine program set up.

Based on the history of bond rates for non-tax-exempt revenue bonds and a 10-year repayment window, we estimate that it will cost $6.785 million per year for the repayment of a $50 million bond over 10 years.

Administrative Costs

Once the program is established, it will also require administrative staff to process benefits, program management staff, and IT support staff as well as office space, phone lines, and computers for staff along with other overhead costs. It will also require resources to devote to continued outreach and education about the program.

IMPAQ International found, in its review of the administrative costs of establishing and operating state paid family and medical leave programs, that the actual ongoing administrative costs as a percentage of total program benefits ranged from 4.33 percent in Rhode Island to 6.43 percent in New Jersey.[13] For simplicity, we assume ongoing administrative costs will equal 5 percent of total program benefits.

Premium Calculations

We explored a number of different revenue bases when estimating the premium required to ensure that the program is sustainable. The first was total earnings of eligible workers, which simply adds up the total annual earnings of all workers who are eligible for the program. When we express the total estimated program costs as a share of total earnings, we estimate the premium required for the program to be 0.72 percent, split equally between workers and employers.

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[11] Sarah Flood et al., "Integrated Public Use Microdata Series, Current Population Survey: Version 9.0 [Dataset]" (Minneapolis, MN: IPUMS, 2021), https://cps.ipums.org/cps/.

[12] IMPAQ International, LLC, "A Review of the Administrative Costs of Establishing a State Paid Family and Medical Leave Program" (Columbia, MD: IMPAQ International, LLC, January 5, 2021), https://www.dol.gov/sites/dolgov/files/OASP/evaluation/pdf/microsim_doc_admin_cost_508.pdf.

[13] Ibid.

The second revenue base was total wages of eligible workers capped at the Social Security taxable income limit, which in 2018 was $128,400.[14] This reduced the revenue base slightly, thus requiring a slightly higher premium for the program at 0.75 percent.

The last two revenue bases were total wages of eligible workers capped at the Social Security taxable income limit, but excluding employers with fewer than 10 and fewer than 15 employees from paying the employer share of the premium. The distribution of workers and earnings by business size was analyzed using the 2019 CPS ASEC.[15] Since business size is intervalled in the CPS ASEC, we assumed a uniform distribution of workers across each individual firm size within the range (e.g. we assumed that one third of workers in the 10 to 24 employees group were in businesses with fewer than 15 employees). We believe this is a reasonable assumption because comparisons of data on employment at businesses with 10-19 employees from the Annual Business Survey and employment at businesses with 10-24 employees from the Current Population Survey (both for 2019) show that businesses with 10-19 employees represent about 64 percent of employment at businesses with 10-24 employees—roughly two-thirds—suggesting that employment appears to be more or less evenly distributed in this particular firm size category.

We then calculated total worker earnings regardless of business size and then total worker earnings with earnings of workers at small businesses excluded. The revenue base with small businesses excluded was taken as a share of total worker earnings (regardless of business size) and then half the difference was added back in to reflect the fact that workers at small businesses would still pay their premiums. These ratios were then applied to the total wages of eligible workers capped at the Social Security income limit to arrive at the estimate of the relevant revenue base. Total program costs were then expressed as a share of these revenue bases to arrive at an estimated premium of 0.79 to 0.81 percent.

Recommended Buffer for Premium Rates

Because the estimates provided of the cost and required premium contributions under the proposed paid leave program are model-based, there is a certain margin of error involved in these estimates. In order to ensure the solvency of the program, it would be wise to consider adding a buffer to the estimated premium to account for the possibility of exceptionally high take-up and usage.

To arrive at a recommended buffer, we replicated the above analysis but used the upper bound of the 95% confidence interval for the number of leaves taken, benefits costs, and average leave length provided through the Worker PLUS model. This gives us an upper bound on the costs and contribution rates that we could reasonably expect given the model estimates. We found that this increases the total estimated cost to just over $220 million. The amount that this increases the premium contribution rate varies depending on the revenue base used, but generally the upper bound estimates raised expected contribution rates by 0.05 percentage points for each revenue base we considered. We, therefore, recommend that 0.05 percentage points be added to the estimated premium associated with the revenue base that is decided upon.

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[14] U.S. Social Security Administration, "Maximum Taxable Earnings," Retirement Benefits, 2022, https://www.ssa.gov/benefits/retirement/planner/maxtax.html.

[15] Flood et al., "Integrated Public Use Microdata Series, Current Population Survey: Version 9.0 [Dataset]."

Recommended Trigger for Solvency Report

As with premium contribution rates, it is also recommended to have procedures in place to review the program if its solvency could be in jeopardy and to ensure that rates do not increase by an unreasonable amount for workers. We recommend triggering a solvency report if the annual increase in the premium rate exceeds 0.1 percentage points (about a 14 percent increase from the baseline contribution rates estimated above). We base this recommendation on the idea that if premium rates increase at a significantly faster pace than inflation, costs may become overly burdensome for some workers over time. Current inflation rates are at 8.5 percent (not seasonally adjusted).[16] Thus, setting the trigger at a 0.1 percentage point increase in premiums would ensure that a solvency report is not triggered often, but that it would also catch potential issues before rates increase by an unreasonable amount for workers.

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[16] U.S. Bureau of Labor Statistics. 2022. "Consumer Price Index – March 2022." https://www.bls.gov/news.release/pdf/cpi.pdf.

About James Myall

James is the Maine Center for Economic Policy's lead on the inclusive economy, including research on labor issues, gender and racial equity, and health care policy. James conducts research and impact analyses, writes educational materials, and collaborates with partners. He is skilled in data collection, research, and statistical and policy analysis. He studied public policy and management at the University of Southern Maine and holds a master's degree in ancient history and archaeology from the University of St. Andrews in Scotland.

About Jessica Milli

Jessica Milli, PhD is an economist with over 8 years of experience directing high-impact research projects and impact evaluations with a focus on social and economic equity. As the founder of Research 2 Impact, Dr. Milli utilizes a mixed-methods research approach that helps organizations, philanthropists, and policymakers leverage data and stories to drive social impact. A core part of this work is the application of an intersectional framework that explores how individual identities shape peoples' experiences and needs. Dr. Milli has authored or co-authored more than 40 publications on a range of economic and social policy issues disproportionately impacting women and people of color throughout her career. Recognized as a leading expert in the field, she has been quoted in more than 50 print, online, and radio news stories including in Bloomberg, The Atlantic, Marketplace, and Fortune, and has been invited to provide expert testimony to state and local legislative bodies on a range of public policy issues.