

SERFF Tracking #:	INAC-132818409	State Tracking #:	INAC-132818409	Company Tracking #:	KHPE SG 1-1-2022
State:	Pennsylvania	Filing Company:	Keystone Health Plan East, Inc.		
TOI/Sub-TOI:	H15G Group Health - Hospital/Surgical/Medical Expense/H15G.003 Small Group Only				
Product Name:	KHPE Small Group HMO eff 1-1-2022				
Project Name/Number:	/				

Supporting Document Schedules

Satisfied - Item:	ACA Public Rate Filing PDF
Comments:	
Attachment(s):	Public Rate Filing KHPE Small Group 20210810.pdf
Item Status:	
Status Date:	



May 18, 2021

Ms. Tracie Gray, Director
Bureau of Accident and Health Insurance
Pennsylvania Insurance Department
1311 Strawberry Square
Harrisburg, PA 17120

SUBMITTED VIA SERFF

**RE: Keystone Health Plan East
Small Group HMO Rate Filing effective 1/1/2022
INAC-132818409**

Dear Ms. Gray:

Keystone Health Plan East (KHPE) is proposing a reduction in Small Group Health Insurance rates effective January 1, 2022 and later.

Attached is the 2022 rate filing for HMO plans of Keystone Health Plan East (KHPE), and Direct Point-of-Service (DPOS) plans, of which a large majority of benefit expenses is attributed to KHPE and the remainder to QCC Insurance Company (QCC), and offered to small employer groups in the Commonwealth of Pennsylvania. Rates for new and renewing plans are being filed and satisfy market reform requirements of the Affordable Care Act (ACA).

This rate filing includes rates for these plans and specifies compliance with rating requirements of the ACA. The enclosed is for rating periods effective from January 1, 2022 through December 31, 2022.

The proposed 2022 rates represent a 3.4% increase over the previously approved 2021 rates.

Information for the Pennsylvania Bulletin:

- | | | |
|----|-------------------------------------|----------------------------------|
| 1. | Company Name and NAIC Number: | Keystone Health Plan East; 95056 |
| 2. | Market | Small Group |
| 3. | On or Off Exchange | Off |
| 4. | Effective Date of Coverage | January 1, 2022 |
| 5. | Average Rate Change Requested | 3.4% |
| 6. | Range of Rate Changes Requested | -3.0% to 4.5% |
| 7. | Total Annual Revenue Generated from | |



	the Proposed Rate Change	\$23,057,657
8.	Products	HMO
9.	Rating Areas and Change from 2021	Rating Area 8; No Change
10.	Metal Levels and Catastrophic Plans	Platinum, Gold, Silver, Bronze
11.	Current covered lives and policyholders as of February 1, 2021	103,318 lives
12.	Number of plans offered in 2022 and change from 2021	22 plans in 2022; 21 plans in 2021
13.	Corresponding contract form number, SERFF, and binder numbers	SERFF # INBC-132821835 See appendix for form numbers.
14.	HIOS Issuer ID # and submission tracking Number	HIOS Issuer ID # 33871; Filing # 33871-2015250937999930375

Please contact [REDACTED] at [REDACTED] or [REDACTED] with any questions regarding this filing.

Sincerely,

[REDACTED]

cc:

[REDACTED]



APPENDIX

Form Numbers

KE 670 WPR GMC Rev. 1.22
KE 670 SG EXC-OFF Rev. 1.22
KE 670 SG EXC-OFF.Direct Rev. 1.22
KE 670 SG EXC-OFF.Tier Rev. 1.22
PREV/SCH-II Rev. 1.22

Attachment I

Rate Change Summary

Keystone Health Plan East – Small Group Plans

Rate request filing ID # INAC-132818409 - This document is prepared by the insurance company submitting the rate filing as a consumer tool to help explain the rate filing. It is not intended to describe or include all factors or information considered in the review process. For more information, see the filing at

<https://www.insurance.pa.gov/Consumers/HealthInsuranceFilings/Pages/ACA-Health-Rate-Filings.aspx>

Overview

Initial requested average rate change:	3.4% ¹
Revised requested average rate change:	N/A ¹
Range of requested rate change:	-3.0% to 4.5%
Effective date:	January 1, 2022
Mapped Members:	103,318
Available in:	Area 8

Key information

Jan. 2020-Dec. 2020 financial experience

Premiums	\$650,395,400
Claims	\$503,233,323
Administrative expenses	\$43,737,799
Taxes & fees	\$90,576,871
Company made (after taxes)	\$12,847,406

How it plans to spend your premium

This is how the insurance company plans to spend the premium it collects in 2022:

Claims:	82%
Administrative:	15%
Taxes & fees:	1%
Profit:	2%

The company expects its annual medical costs to increase **8.4%**.

Explanation of requested rate change

Keystone Health Plan East ("KHPE") is revising premium rates for the Pennsylvania Small Group ACA compliant products, effective from January 1, 2022.

About 103,000 members will be affected.

Changes in Taxes and Fees:

The Federal government ended the Health Insurance Providers Fee beginning with premiums due in 2021.

¹ Note that the Initial requested average rate change reflects the insurer's rate change request, in July, after they have received information about the impact of a federal program called risk adjustment and finalization of the reinsurance program parameters.

Changes in Medical Service Costs:

Premium rates for health care insurance are increasing as the cost of health care service rise. Health care service costs increase as health care providers increase their fees, members use more health care services and supplies, and the types of health care services and supplies change, among other factors.

Financial Experience of the Product:

KHPE is required by federal law to pay out a minimum of 80% percent of premium dollars for medical claims—this is referred to as the minimum Medical Loss Ratio (MLR). The rate action proposed in this filing is expected to achieve a Medical Loss Ratio of greater than 80% using the state's estimates for individual mandate and CSRs not being funded.

Changes in Benefits:

Some plan benefits are mandated by federal and state law. Benefit changes for some plans were also made. All changes in benefits are in compliance with the uniform modifications rules stipulated by the Federal government.

Administrative Costs:

In addition, the Affordable Care Act (ACA) imposes taxes and other levies.

PENNSYLVANIA ACTUARIAL MEMORANDUM

PURPOSES

This Actuarial Memorandum is provided along with the Unified Rate Review Template (URRT) and PA Actuarial Memorandum Rate Exhibits to provide certain information to support the gross premium for the single risk pool for small group market health care insurance underwritten by Keystone Health Plan East in the Commonwealth of Pennsylvania. It is provided as a component of a state rate filing. This submission may not be appropriate for other purposes.

1. BASIC INFORMATION AND DATA

A. COMPANY INFORMATION

Company Legal Name:	Keystone Health Plan East ("KHPE")
State:	Pennsylvania
NAIC #:	95056
Market:	Small Group
Marketplace:	Off Exchange
Effective Date(s):	1/1/2022 – 3/31/2022, 4/1/2022 – 6/30/2022, 7/1/2022 – 9/30/2022, 10/1/2022 – 12/31/2022
Average Rate Change:	3.4%
Range of Rate Changes:	-3.0% to 4.5%
Products:	HMO
Rating Areas:	Rating Area 8
Metal Levels:	Platinum, Gold, Silver, Bronze
Current Members:	103,318
Number of 2022 Plans:	22
HIOS Issuer ID (5-digit):	33871

Worksheet 1 of the accompanying URRT contains experience period data and development of the projected Single Risk Pool Gross Premium Average Rate PMPM for the small group market for KHPE. Worksheet 2 contains experience period data and projections by product for the single risk pool for the same entities. This memorandum pertains only to plans denoted in Worksheet 2 by Plan IDs starting with the sequence 33871.

COMPANY CONTACT INFORMATION

Primary Contact Name:	
Primary Contact Telephone Number:	
Primary Contact Email Address:	

INAC-132818409
KHPE Small Group

B. RATE HISTORY AND PROPOSED VARIATIONS IN RATE CHANGES

January 1, 2015	8.40%	INAC- 129626509
October 1, 2015	-0.30%	INAC- 130111004
January 1, 2016	6.88%	INAC- 129955625
January 1, 2017	27.97%	INAC- 130539718
July 1, 2017	2.00%	INAC- 130959307
January 1, 2018	10.19%	INAC- 131005809
July 1, 2018	1.59%	INAC- 131405465
January 1, 2019	4.26%	INAC- 131478481
April 1, 2019	-1.12%	INAC- 131750260
July 1, 2019	-3.10%	INAC- 131860437
January 1, 2020	9.70%	INAC- 131927130
April 1, 2020	6.70%	INAC- 132132176
January 1, 2021	0.90%	INAC- 132358832
July 1, 2021	3.63%	INAC- 132762206

The historical rate changes varied by metallic tier based on plan benefits as illustrated via the Pricing AV.

Proposed rate changes may vary by metallic tier and plan based on plan benefit changes.

C. AVERAGE RATE CHANGE

The average proposed rate change shown in Cell AC15 of Table 10 is 3.4%. The changes to the single risk pool gross premium average rate per member per month (PMPM) from calendar year 2020 to calendar year 2022 are incorporated into the pricing and reflected in the Unified Rate Review Template.

The change in 21-year-old Non-Tobacco Premium PMPM calculated in Table 11, Cell AN13 is 3.5%.

D. MEMBERSHIP COUNT

Table 1 illustrates the Experience Period member-months, Current Period members as of February 1, 2021, and Projected Rating Period Member-months by ages.

E. BENEFIT CHANGES

Benefit changes were made to the following plans to assure compliance with Actuarial Value

Requirements, including differences that resulted from changes to the AV Calculator. The basis for pricing changes was our internal pricing model.

F. EXPERIENCE PERIOD CLAIMS AND PREMIUMS

Table 2 illustrates the experience period claims and premiums using calendar year data. The data is consistent with the data reported in Section 1 of Worksheet I of the URRT.

We combined the experience period data for KHPE with the experience period data for QCC Insurance Company ("QCC"). This should provide a more stable basis for projecting the Index Rate. The combined data is shown in Tab Ib. The Change in Network Factor is intended to result in KHPE rates that are reasonable in relation to QCC rates.

Experience period premium, claims, and member months are obtained from the company's internal data warehouse. The claims data is collected for incurred dates from January through December 2020 and paid through February 2021. Earned premiums and member months are for January through December 2020. The data are for all direct-written small group business of KHPE in the Commonwealth of Pennsylvania, including out-of-network claims written by KHPE but paid by QCC for POS plans. No private reinsurance was applicable.

Projected Risk Adjustment PMPM

Projected Risk Adjustment is accounted for in Projected Incurred Claims before the state based reinsurance program and Risk Adjustment to reflect anticipated risk adjustment transfer amounts for the projection period. The amount reflects the projected morbidity for the single risk pool in the projection period.

The estimated risk adjustment revenue for all of the plans in the risk pool is developed using the following methodology. We recognize that the HHS payment transfer formula implies that the projected incurred claims based solely on the experience period single risk pool claims need to be adjusted by the ratio of the current statewide market's risk relative to allowable rating factor (ARF) for age compared to the single risk pool's risk relative to ARF presented during the experience period. This adjustment, together with the assumed future changes in population risk morbidity, results in the issuer's pricing being consistent with the anticipated morbidity level of the future statewide market.

The anticipated risk adjustment transfer revenue is allocated proportionally based on plan premium. The Projected Risk Adjustment is subtracted from Projected Incurred Claims before ACA Risk Adjustment to reflect anticipated receipt of risk adjustment transfer amounts for the projection period.

The projected risk adjustment amounts for KHPE and Independence Blue Cross (QCC) are consistent with the projection made in the respective submissions. We also considered preliminary 2020 risk transfer results.

In the URRT v5.3, it is necessary to divide Risk Adjustment by the Paid to Allowed factor when it is used in calculations based on Allowed Claims to produce calculations that are consistent with the Actuarial Memo Rate Exhibit.

G. CREDIBILITY OF DATA

The experience period data is considered 100% credible.

H. TREND IDENTIFICATION

Table 3 identifies the proposed annual medical and prescription drug allowed claims cost and utilization trends. These data match the data illustrated in Section 2 of Worksheet I of the URRT. Additional discussion is provided in Section I, Historical Experience.

We populated the URRT with the Total Annual Trend calculated in cell G52 of Table 3. The URRT requires that factors are rounded to four decimal places which results in some small differences.

I. HISTORICAL EXPERIENCE

Table 4 illustrates historical experience from 2017 through 2020 for the product line.

a. Annualized Cost Trend

Annual cost trend reflects changes in costs of medical treatment due to medical inflation and changes in the distribution of services across network providers. The trend value is developed by reviewing historical medical costs for the single risk pool and adjusting them for anticipated future provider contracting reimbursement levels. The data is normalized for changes in age, benefit changes during the experience period, changes to provider contracts, and prescription drug formulary, and new drugs brought to market.

b. Annualized Utilization Trend

Annual utilization trend reflects the change in the number of units per 1,000 members for a fixed level of illness burden and includes changes due to the mix and intensity of services provided and changes related to shifts in product mix. It also includes effects of selection, if any, since this cannot be reflected in the relative cost of the various products and plans offered.

c. Benefit Changes

Historical medical costs are normalized for the impact of benefit and mix factors to isolate the effect that changes in plan design or member movements amongst plans has on historical trend. By isolating this impact we avoid projecting cost trends into the future that are due to non-repeatable historical member movements or benefit changes.

1. Benefit changes are calculated to value the cost-to-health-plan impact of year-over-year changes in plan designs. The methodology used to calculate the benefit changes is consistent with the one used in the calculation of Pricing AV.
2. Mix impact is calculated using the historical average costs by member at the metallic level, separately for HMO and PPO products.
(Ex. X% of our members shifted from one metallic level to another in a historical period which is determined to move our average plan cost by y% in aggregate. We itemize this one-time cost impact of members shifting plans so it is not included in forward-looking trend projections.)

J. TERMINATED PLANS

No plans are being terminated in 2022.

2. RATE DEVELOPMENT AND CHANGE

A. DEVELOPMENT OF PROJECTED INDEX RATE, MARKET-ADJUSTED INDEX RATE, & TOTAL ALLOWED CLAIMS

Table 5 illustrates the development of the Projected Index Rate and Market-Adjusted Index Rate beginning with the Experience Period Index Rate. Exhibit A provides additional information about the adjustment factors.

Changes in Population Risk Morbidity

Experience period allowed claims are adjusted to account for differences in the average morbidity of the single risk pool population underlying the experience and the anticipated population in the projection period. This adjustment reflects changes in the small group market-wide morbidity.

COVID-19 Impact

Changes in Other Factors

Experience period allowed claims are adjusted to account for differences in the single risk pool population underlying the experience and the anticipated population in the projection period pertaining to several factors not due to changes in morbidity or the costs and utilization of medical care. This adjustment reflects: additional benefits required to be covered as essential health benefits; recently mandated benefits required by state law that are not reflected in the experience period data; benefits in the experience that are removed for the projection period; anticipated changes in the average utilization of services due to differences in average cost sharing requirements during the experience period and average cost sharing requirements in the projection period; changes in demographic characteristics of the single risk pool experience period population and the projection period population (including age, gender, region, and tobacco use); changes in the provider network (adding or removing a provider system or introducing a limited network option); and anticipated changes in pharmacy rebates.

We incorporated the quarterly trend methodology from Table 5A into the URRT Part 1 Worksheet 1 Section II so that the calculated MAIR in the URRT was consistent with the MAIR calculated in the Actuarial Memo Rate Exhibits. The factor is also applied in the URRT Worksheet 2 Section 3, Plan Adjustment Factors, to correctly calculate the first quarter 2022 rates.

Table 5 of the Actuarial Memorandum Rate Exhibit shows the components used in calculating change in other. The calculations of the components are based on the changes in values shown in Table 7.

B. RETENTION ITEMS

Table 6 illustrates the retention items, expressed as percentages of premium. Consistent with conversations with our State regulator, no Pricing load was applied for the Managed Care Assessment levied pursuant to Article VIII-I of the Pennsylvania Code, as it will be separately reimbursed. Federal Income Tax is calculated by applying the tax rate to the sum of the HIF plus Profit/Contingency.

Administrative Expenses		15.34%
General and Claims	9.57%	
Agent/Broker Fees and Commissions	4.97%	
Quality Improvement Initiatives	0.80%	
Taxes and Fees		0.59%
Risk Adjustment User Fee	0.05%	
PCORI Fee	0.04%	
PA Premium Tax	0.00%	
Federal Income Tax	0.51%	
Health Insurance Providers Fee	0.00%	
INAC-132818409	6	PA Actuarial Memorandum
KHPE Small Group		May 18, 2021
		Revised July 23, 2021

Profit/Contingency	1.91%
Total Retention	17.84%

C. NORMALIZED MARKET-ADJUSTED PROJECTED ALLOWED TOTAL CLAIMS

Table 7 compares the normalization factors used in this filing to those used in the 2021 filing. The changes in the factors reflect small differences from the projected populations in 2021 and 2022.

D. COMPONENTS OF RATE CHANGE

Table 8 illustrates the components of rate change, based on inputs from other sections of the Rate Exhibits. The results in Row H are similar to the values in Row A of Table 8.

Data in Table 9 is consistent with the 2021 and 2022 URRT with the exceptions of Risk Adjustment and Reinsurance which were revised to project company-specific values.

3. PLAN RATE DEVELOPMENT

Table 10 is populated with plan information consistent with entries in the 2022 URRT. Plan mappings, where applicable, are illustrated in Column F of Table 10.

Attached to this actuarial memorandum are exhibits providing actuarial certifications for the use of alternate methods of calculating the Actuarial Value, where applicable, as well as required support for the calculations.

The factor “AV and Cost Sharing Design of Plan” in Worksheet 2 of the URRT is the product of the Pricing AV, the Benefit Richness Factors from the Actuarial Memo Rate Exhibit. We incorporated the first quarter factor from cell J34 of Table 5A of the Actuarial Memo Rate Exhibit. Again, please note that the URRT requires factors to be rounded to four decimal places, resulting in small differences.

4. PLAN PREMIUM DEVELOPMENT FOR 21-YEAR OLD NON-TOBACCO USER

Table 11 is populated from other sections of the Rate Exhibits, along with the population by age and rating area for the Projection Period.

5. PLAN FACTORS

Tables 12, 13, and 14 illustrate the factors used in pricing for age, tobacco, geographic rating area, and network. The tobacco factors match the previously approved tobacco factors from the 2021 filing.

6. ACTUARIAL CERTIFICATION

I, [REDACTED], am Director & Actuary of Commercial Markets for the Independence Blue Cross Family of Companies. I am a member of the Society of Actuaries and the American Academy of Actuaries with the education and experience necessary to perform the work necessary and meet the Qualification Standards of the American Academy of Actuaries to render the qualified actuarial opinion contained herein. The developed rates and memorandum have been prepared in conformity with appropriate Actuarial Standards of Practice and the Academy's Code of Professional Conduct.

The Part I Unified Rate Review Template does not demonstrate the process used by the issuer to develop the premium rates and allowable rating factors. Rather, it represents information required by Federal regulation to be provided in support of the review of gross premium rate increases, for certification of qualified health plans for Federally facilitated exchanges, and for certification that the index rate is developed in accordance with Federal regulation and used consistently and only adjusted by the allowable modifiers.

I hereby certify that, to the best of my knowledge and judgment, the following:

- The projected index rate is:
 - In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.08(d)(1) and 147.106);
 - Developed in compliance with applicable Actuarial Standards of Practice;
 - Reasonable in relation to the benefits provided and the population anticipated to be covered; and
 - Neither excessive nor deficient.
- The index rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan level rates.
- The percent of total premium that represents essential health benefits included in Worksheet 2, Sections III and IV were calculated in accordance with actuarial standards of practice.
- The AV Calculator was used to determine the AV Metal Values illustrated in Worksheet 2 of the Part I Unified Rate Review Template for all plans, unless an alternate methodology was required. If an alternate methodology was used to calculate the AV Metal Value for at least one plan offered, a copy of the actuarial certification required by 45 CFR Part 156, §156.135 will be included.
- All factor, benefit, and other changes from the prior approved filing have been disclosed in the actuarial memorandum.
- New plans cannot be considered modifications of existing plans under the uniform modification standards in 45 CFR 147.106.

- The information presented in the PA Actuarial Memorandum and PA Actuarial Memorandum Rate Exhibits is consistent with the information presented in the 2022 Rate Filing Justification.

May 18, 2021

PA Rate Template Part I
Data Relevant to the Rate Filing

Table 0. Identify/wise Information

Carrier Name:	Keystone Health Plan East
Product/ID:	HMO
Market Segment:	Small Group
Rate Effective Date:	1/1/2022
Base Period Start Date:	1/1/2020
Rate of Most Recent Membership:	3/1/2021

to 12/31/2022
to 12/31/2020

Table 1. Number of Members

	Member-months	Members	Member-months
	Experience Period	Current Period (as of 06/30/2021)	Projected Rating Period
Average Age	36.6	36.6	36.6
Total	1,285,783	103,318	1,239,816
<18	214,157	17,052	204,872
18-24	113,370	8,050	107,400
25-29	114,724	8,824	110,088
30-34	114,824	10,746	114,946
35-39	117,868	8,531	116,771
40-44	107,801	8,719	109,571
45-49	105,105	8,252	99,144
50-54	103,149	8,609	110,808
55-59	118,804	10,426	124,146
60-63	62,868	7,571	66,871
64+	11,959	2,585	11,022

Table 2. Experience Period Claims and Premiums

Earned Premium	Paid Claims	Ultimate Incurred Claims	Member Months	Estimated Cost Sharing (Member & HHS)	Allowed Claims (Non-Capitated)	Non-DRB portion of Allowed Claims	Total Prescription Drug Rebates*	Total DRB Capitation	Total Non-DRB Capitation	Estimated Risk Adjustment	Estimated Reinsurance Recoveries
\$16,424,249.54	\$16,424,249.54	\$16,424,249.54	3,280,783	76,149,254.51	\$16,424,249.54	\$	\$16,424,249.54	\$	\$16,424,249.54	\$	\$
Experience Period Total Allowed DRB Claims + DRB Capitation PMPM (out of prescription drug rebates)											446.57
Loss Ratio											77.16%

*Express Prescription Drug Rebates as a negative number

Table 3. Trend Components

Service Category	Cost*	Utilization**	Induced Demand**	Comorbidity Trend	Weight*
Impatient Hospital	1.11%	11.42%	0.00%	14.98%	18.93%
Outpatient Hospital	3.01%	11.42%	0.00%	14.78%	18.31%
Professional	2.24%	11.42%	0.00%	13.91%	23.65%
Other Medical	1.44%	11.42%	0.00%	13.91%	10.00%
Capitation				13.91%	19.86%
Prescription Drugs	-6.47%	11.42%	0.00%	19.86%	27.66%
Total Annual Trend				2.24%	
Months of Trend				24	
Total Applied Trend Projection Factor				1.180	

*Express Cost, Utilization, Induced Utilization and Weight in percentages

** Should equal UBRF Trend

Table 4. Historical Experience

Month-Year	Total Annual Premium	Incurred Claims	Completion Factor*	Ultimate Incurred Claims	Members	Ultimate Incurred PMPM	Estimated Annual Cost Sharing (Member + HHS)	Prescription Drug Rebates**	Allowed Claims (Net of Prescription Drug Rebates)	Allowed PMPM
Jan-17		\$ 38,479,567.18	1.000%	\$ 38,479,567.18	120,494	\$ 319.34		\$ (787,461.01)	\$ 45,814,318.22	\$380.21
Feb-17		\$ 39,791,636.94	1.000%	\$ 39,791,636.94	116,524	\$ 340.17		\$ (718,609.22)	\$ 45,488,027.24	\$372.33
Mar-17		\$ 39,756,332.17	1.000%	\$ 39,756,332.17	119,800	\$ 332.44		\$ (727,203.16)	\$ 44,781,886.21	\$372.05
Apr-17		\$ 39,354,633.33	1.000%	\$ 39,354,633.33	119,781	\$ 328.24		\$ (735,305.84)	\$ 44,869,344.58	\$341.20
May-17		\$ 39,117,705.17	1.000%	\$ 39,117,705.17	119,562	\$ 328.63		\$ (646,861.70)	\$ 43,787,527.44	\$365.86
Jun-17		\$ 37,318,288.14	1.000%	\$ 37,318,288.14	119,378	\$ 312.61		\$ (801,889.17)	\$ 43,444,122.16	\$383.81
Jul-17		\$ 36,707,085.24	1.000%	\$ 36,707,085.24	118,501	\$ 309.88		\$ (774,867.03)	\$ 43,527,715.46	\$318.87
Aug-17		\$ 39,443,021.65	1.000%	\$ 39,443,021.65	118,136	\$ 333.47		\$ (649,102.11)	\$ 44,094,088.11	\$378.89
Sep-17		\$ 36,729,184.70	1.000%	\$ 36,729,184.70	118,189	\$ 310.10		\$ (735,732.44)	\$ 43,697,246.94	\$352.21
Oct-17		\$ 39,618,182.08	1.000%	\$ 39,618,182.08	118,074	\$ 335.70		\$ (655,479.46)	\$ 44,514,077.84	\$377.63
Nov-17		\$ 37,331,163.79	1.000%	\$ 37,331,163.79	117,821	\$ 316.58		\$ (805,811.71)	\$ 43,900,398.06	\$383.81
Dec-17	\$68,650,454.45	\$ 39,981,024.16	1.000%	\$ 39,981,024.16	116,569	\$ 342.74	\$ 75,872,049.41	\$ (844,654.24)	\$ 43,716,226.46	\$366.24
Jan-18		\$ 37,491,108.19	1.000%	\$ 37,491,108.19	115,274	\$ 325.77		\$ (705,401.68)	\$ 43,143,605.17	\$377.47
Feb-18		\$ 34,851,229.47	1.000%	\$ 34,851,229.47	114,768	\$ 303.93		\$ (874,152.42)	\$ 40,710,433.37	\$354.63
Mar-18		\$ 35,502,985.45	1.000%	\$ 35,502,985.45	113,438	\$ 313.77		\$ (815,189.10)	\$ 41,232,104.47	\$361.49
Apr-18		\$ 37,028,281.47	1.000%	\$ 37,028,281.47	112,273	\$ 329.81		\$ (814,268.14)	\$ 42,831,279.16	\$381.49
May-18		\$ 37,818,010.99	1.000%	\$ 37,818,010.99	111,764	\$ 338.45		\$ (819,907.24)	\$ 43,674,024.16	\$392.73
Jun-18		\$ 35,895,400.03	1.000%	\$ 35,895,400.03	110,911	\$ 323.64		\$ (860,902.48)	\$ 41,984,427.74	\$378.13
Jul-18		\$ 35,784,470.16	1.000%	\$ 35,784,470.16	109,868	\$ 326.71		\$ (832,149.80)	\$ 41,124,078.60	\$374.80
Aug-18		\$ 35,493,291.03	1.000%	\$ 35,493,291.03	109,391	\$ 324.45		\$ (871,141.67)	\$ 41,100,139.81	\$375.73
Sep-18		\$ 34,692,084.78	1.000%	\$ 34,692,084.78	109,163	\$ 317.80		\$ (887,870.06)	\$ 40,506,731.08	\$362.48
Oct-18		\$ 36,936,723.18	1.000%	\$ 36,936,723.18	108,681	\$ 339.02		\$ (805,904.08)	\$ 42,518,611.49	\$391.60
Nov-18		\$ 33,625,763.16	1.000%	\$ 33,625,763.16	108,401	\$ 310.10		\$ (853,762.10)	\$ 40,479,516.07	\$358.60
Dec-18	\$201,481,474.46	\$ 34,813,829.11	1.000%	\$ 34,813,829.11	109,777	\$ 314.10	\$ 27,508,496.96	\$ (858,622.11)	\$ 40,617,099.26	\$388.77
Jan-19		\$ 35,102,725.79	1.000%	\$ 35,102,725.79	109,871	\$ 320.11		\$ (810,898.48)	\$ 42,489,542.24	\$386.73
Feb-19		\$ 32,224,594.84	1.000%	\$ 32,224,594.84	109,681	\$ 293.80		\$ (900,448.64)	\$ 41,742,880.58	\$344.13
Mar-19		\$ 35,927,386.47	1.000%	\$ 35,927,386.47	109,438	\$ 328.26		\$ (884,761.76)	\$ 42,848,480.68	\$384.24
Apr-19		\$ 37,678,088.00	1.000%	\$ 37,678,088.00	109,291	\$ 345.26		\$ (1,004,571.17)	\$ 43,117,719.18	\$394.53
May-19		\$ 37,442,173.76	1.000%	\$ 37,442,173.76	109,210	\$ 342.82		\$ (1,025,843.03)	\$ 43,984,740.17	\$399.13
Jun-19		\$ 33,404,814.93	1.000%	\$ 33,404,814.93	108,970	\$ 306.55		\$ (854,545.10)	\$ 40,731,813.34	\$354.45
Jul-19		\$ 35,893,085.08	1.000%	\$ 35,893,085.08	108,842	\$ 326.77		\$ (1,055,931.84)	\$ 41,557,231.05	\$381.81
Aug-19		\$ 36,493,011.81	1.000%	\$ 36,493,011.81	108,753	\$ 335.96		\$ (1,014,969.46)	\$ 42,122,000.46	\$387.74
Sep-19		\$ 35,277,378.05	1.000%	\$ 35,277,378.05	108,446	\$ 324.70		\$ (1,056,471.61)	\$ 40,425,109.11	\$373.95
Oct-19		\$ 37,627,381.64	1.000%	\$ 37,627,381.64	108,708	\$ 346.13		\$ (1,113,787.44)	\$ 43,528,490.76	\$398.43
Nov-19		\$ 34,995,713.78	1.000%	\$ 34,995,713.78	108,710	\$ 321.80		\$ (1,047,444.49)	\$ 40,324,469.78	\$375.00
Dec-19	\$176,249,620.11	\$ 35,443,387.98	1.000%	\$ 35,443,387.98	109,811	\$ 322.77	\$ 81,324,971.76	\$ (1,110,250.49)	\$ 41,184,458.07	\$375.00
Jan-20		\$ 37,807,575.42	1.000%	\$ 37,807,575.42	110,499	\$ 342.16		\$ (1,792,310.79)	\$ 42,724,579.51	\$386.67
Feb-20		\$ 36,716,294.46	0.998%	\$ 36,716,294.46	110,291	\$ 329.43		\$ (1,551,414.17)	\$ 40,701,611.27	\$369.63
Mar-20		\$ 33,931,948.48	0.998%	\$ 33,931,948.48	110,191	\$ 299.82		\$ (1,058,635.30)	\$ 39,673,411.78	\$332.83
Apr-20		\$ 29,213,424.40	0.998%	\$ 29,213,424.40	109,841	\$ 264.89		\$ (1,041,405.49)	\$ 38,148,495.14	\$283.20
May-20		\$ 30,631,103.82	0.994%	\$ 30,796,106.12	109,438	\$ 280.63		\$ (1,087,508.14)	\$ 37,679,122.17	\$313.27
Jun-20		\$ 34,245,613.84	0.999%	\$ 34,401,186.92	107,150	\$ 321.00		\$ (1,140,763.30)	\$ 38,172,647.10	\$356.27
Jul-20		\$ 36,068,133.82	0.999%	\$ 36,404,847.47	108,401	\$ 336.91		\$ (1,098,396.44)	\$ 40,471,866.44	\$374.80
Aug-20		\$ 34,480,632.09	0.987%	\$ 35,111,991.69	106,136	\$ 330.82		\$ (1,277,687.72)	\$ 39,069,932.44	\$368.11
Sep-20		\$ 33,519,058.66	0.984%	\$ 34,127,719.13	106,171	\$ 321.73		\$ (1,429,207.38)	\$ 40,115,394.64	\$382.13
Oct-20		\$ 38,400,120.18	0.978%	\$ 39,245,186.95	104,816	\$ 374.43		\$ (1,463,027.03)	\$ 43,402,614.61	\$414.60
Nov-20		\$ 35,587,173.16	0.948%	\$ 36,746,488.32	104,217	\$ 352.70		\$ (1,315,811.62)	\$ 40,876,614.71	\$392.57
Dec-20	\$66,417,701.50	\$ 34,846,191.82	0.948%	\$ 37,543,910.26	106,724	\$ 366.47	\$ 26,763,241.51	\$ (1,514,195.46)	\$ 41,443,729.81	\$396.63

*Express Completion Factor as a percentage

**Express Prescription Drug Rebates as a negative number

Carrier Name: Keystone Health Plan East
Product(s): HMO
Market Segment: Small Group
Rate Effective Date: 1/1/2022

Table 2b. Manual Experience Period Claims and Premiums

Earned Premium	Paid Claims	Ultimate Incurred Claims	Member Months	Estimated Cost Sharing (Member + HSA)	Allowed Claims (Non-Capitated)	Non-ENB portion of Allowed Claims	Total Prescription Drug Rebates*	Total ENB Capitation	Total Non-ENB Capitation	Estimated Risk Adjustment	Estimated Reinsurance Recovery
1,000,000.00	100,000.00	100,000.00	1,127,422	100,000.00	971,880,137.00	100,000,000.00	100,000,000.00	100,000,000.00	100,000,000.00	100,000.00	100,000.00
Experience Period Total Allowed ENB Claims + ENB Capitation minus (not of prescription drug rebates)											
Loss Ratio											

*Express Prescription Drug Rebates as a negative number

Table 3b. Manual Trend Components

Service Category	Cost*	Utilization*	Induced Demand*	Composite Trend	Weight*
Inpatient Hospital	1.22%	8.23%	0.00%	12.25%	18.58%
Outpatient Hospital	3.61%	8.23%	0.00%	11.86%	19.40%
Professional	2.00%	8.23%	0.00%	10.94%	27.84%
Other Medical	0.00%	8.23%	0.00%	10.94%	0.00%
Capitation	0.00%	0.00%	0.00%	11.11%	11.11%
Prescription Drugs	0.47%	8.23%	0.00%	7.73%	23.14%
Total Annual Trend				8.40%	100.00%
Months of Trend				24	
Total Applied Trend Projection Factor				1.474	

*Express Cost, Utilization, Induced Demand and Weight as percentages

Table 4b. Historical Manual Experience

Month-Year	Total Annual Premium	Incurred Claims	Completion Factor*	Ultimate Incurred Claims	Members	Ultimate Incurred PMPM	Estimated Annual Cost Sharing (Member + HSA)	Prescription Drug Rebates**	Allowed Claims (Net of Prescription Drug Rebates)	Allowed PMPM
Jan-17	\$	70,088,516.45	1.0000	70,088,516.45	105,631	358.12	\$	1,508,862.43	65,479,654.02	436.92
Feb-17	\$	53,985,965.82	1.0000	53,985,965.82	105,763	258.82	\$	1,268,950.47	52,716,995.35	287.30
Mar-17	\$	75,868,899.38	1.0000	75,868,899.38	105,101	398.86	\$	1,418,672.18	74,450,227.20	447.11
Apr-17	\$	68,422,642.06	1.0000	68,422,642.06	104,624	341.27	\$	1,454,738.00	66,967,904.06	388.08
May-17	\$	72,461,021.38	1.0000	72,461,021.38	104,631	372.29	\$	1,438,917.79	71,022,103.59	435.48
Jun-17	\$	70,344,127.87	1.0000	70,344,127.87	104,391	361.87	\$	1,548,972.80	68,795,155.07	427.81
Jul-17	\$	66,014,541.94	1.0000	66,014,541.94	103,381	349.38	\$	1,494,021.63	64,520,520.31	392.35
Aug-17	\$	72,218,951.46	1.0000	72,218,951.46	103,611	373.51	\$	1,441,786.01	70,777,165.45	430.03
Sep-17	\$	66,748,113.86	1.0000	66,748,113.86	101,448	345.00	\$	1,472,147.11	65,275,966.75	397.24
Oct-17	\$	71,546,112.46	1.0000	71,546,112.46	102,481	392.09	\$	1,398,847.24	70,147,265.22	432.68
Nov-17	\$	71,587,604.38	1.0000	71,587,604.38	102,111	372.61	\$	1,357,120.66	70,230,483.72	428.18
Dec-17	\$	66,576,718.27	1.0000	66,576,718.27	102,841	349.29	\$	1,458,472.69	65,118,245.58	396.13
Jan-18	\$	66,147,578.04	1.0000	66,147,578.04	102,751	344.81	\$	1,426,926.06	64,720,651.98	393.01
Feb-18	\$	63,703,564.43	1.0000	63,703,564.43	106,177	342.18	\$	1,464,533.72	62,238,990.71	405.41
Mar-18	\$	68,812,576.25	1.0000	68,812,576.25	104,201	371.88	\$	1,746,580.89	67,065,995.36	436.64
Apr-18	\$	66,310,227.42	1.0000	66,310,227.42	101,974	364.30	\$	1,520,449.61	64,789,777.81	430.40
May-18	\$	69,187,643.41	1.0000	69,187,643.41	100,881	380.50	\$	1,705,433.53	67,482,209.88	448.86
Jun-18	\$	64,038,485.04	1.0000	64,038,485.04	101,921	358.55	\$	1,458,235.10	62,580,249.94	420.03
Jul-18	\$	64,112,869.94	1.0000	64,112,869.94	101,648	358.88	\$	1,727,168.41	62,385,701.53	419.28
Aug-18	\$	69,380,867.20	1.0000	69,380,867.20	102,480	388.38	\$	1,861,496.31	67,519,370.89	451.64
Sep-18	\$	69,715,247.41	1.0000	69,715,247.41	101,938	351.16	\$	1,685,738.58	68,029,508.83	407.40
Oct-18	\$	70,268,277.78	1.0000	70,268,277.78	101,311	384.01	\$	1,886,120.64	68,382,157.14	438.94
Nov-18	\$	67,478,831.81	1.0000	67,478,831.81	101,821	361.61	\$	1,858,427.36	65,620,404.45	428.13
Dec-18	\$	63,740,002.00	1.0000	63,740,002.00	100,000	354.50	\$	1,812,238.58	61,927,763.42	413.50
Jan-19	\$	68,613,791.33	1.0000	68,613,791.33	101,474	378.09	\$	1,914,826.06	66,708,965.27	435.80
Feb-19	\$	62,087,022.06	1.0000	62,087,022.06	101,171	342.80	\$	1,713,273.37	60,373,748.69	410.06
Mar-19	\$	69,025,091.11	1.0000	69,025,091.11	101,139	380.92	\$	1,871,928.18	67,153,162.93	432.01
Apr-19	\$	69,091,837.38	1.0000	69,091,837.38	101,371	380.96	\$	1,929,649.01	67,162,188.37	432.08
May-19	\$	70,148,477.61	1.0000	70,148,477.61	101,411	389.46	\$	1,964,303.76	68,184,173.85	436.81
Jun-19	\$	63,496,516.35	1.0000	63,496,516.35	101,791	348.94	\$	1,817,788.89	61,678,727.46	413.04
Jul-19	\$	68,381,250.75	1.0000	68,381,250.75	101,904	381.41	\$	2,021,189.28	66,359,061.47	408.92
Aug-19	\$	69,598,081.77	1.0000	69,598,081.77	102,243	381.90	\$	1,994,181.99	67,603,909.78	446.36
Sep-19	\$	66,831,892.43	1.0000	66,831,892.43	101,491	366.21	\$	1,961,034.07	64,870,858.36	427.81
Oct-19	\$	74,883,280.98	1.0000	74,883,280.98	101,072	409.52	\$	2,138,648.38	72,744,632.60	477.02
Nov-19	\$	68,480,300.63	1.0000	68,480,300.63	101,044	372.04	\$	2,018,020.17	66,462,280.46	434.63
Dec-19	\$	71,275,234.85	1.0000	71,275,234.85	100,804	384.50	\$	2,168,020.47	69,107,214.38	468.74
Jan-20	\$	74,076,181.92	1.0000	74,076,181.92	106,378	397.46	\$	2,176,286.76	71,899,895.16	460.01
Feb-20	\$	71,466,447.81	0.9911	71,466,447.81	101,581	386.25	\$	1,968,617.25	69,507,830.56	441.68
Mar-20	\$	63,830,856.84	0.9888	64,084,692.21	101,670	365.40	\$	1,589,818.40	62,504,878.81	388.04
Apr-20	\$	63,243,617.18	0.9914	63,472,639.37	101,801	369.36	\$	1,493,518.01	61,779,121.17	391.79
May-20	\$	67,241,154.64	0.9981	67,453,287.58	101,608	374.61	\$	1,845,371.04	65,407,916.54	387.48
Jun-20	\$	68,000,000.00	0.9944	68,365,760.34	101,014	377.69	\$	1,814,459.11	66,550,541.23	422.84
Jul-20	\$	69,937,995.38	0.9916	70,478,138.77	100,861	389.46	\$	1,848,688.48	68,630,250.29	437.68
Aug-20	\$	68,683,517.97	0.9893	69,408,444.84	100,107	381.30	\$	1,760,709.41	67,622,838.56	433.34
Sep-20	\$	68,763,302.30	0.9853	69,786,552.46	100,620	390.65	\$	1,750,260.71	68,036,291.75	439.48
Oct-20	\$	73,192,863.49	0.9887	74,631,916.21	101,624	437.81	\$	1,874,606.14	72,817,310.07	470.52
Nov-20	\$	67,804,935.46	0.9774	69,786,980.41	107,464	391.04	\$	1,547,106.80	66,239,873.61	462.96
Dec-20	\$	69,231,881.01	0.9647	72,048,113.87	107,677	408.01	\$	1,490,481.28	69,548,632.59	456.14

*Express Completion Factor as a percentage

**Express Prescription Drug Rebates as a negative number

PA Rate Template Part II
Rate Development and Change

Center Name: **Anytime Health Plan East**
Product/ID: **EMD**
Market Segment: **Small Group**
Rate Effective Date: **1/1/2022**

Table 5. Development of the Projected Index Rate, Market-Adjusted Index Rate, and Total Allowed Claims

Development of the Projected Index Rate	Actual Experience \$Bn	Manual Data
Total Allowed EIB Claims + EIB Cancellation PMPM (net of association drive rebates) PMPM	\$ 465.57	\$ 471.35
Two year trend projection factor	1.333	1.375
Unadjusted Projected Allowed EIB Claims PMPM	\$ 532.61	\$ 553.87
Market Risk Class Adjustment Factors		
Change in Mortality - Impact of Reinsurance Program	1.000	1.000
Change in Mortality - All Other	1.000	0.960
Total Non-Mortality Changes	1.000	0.960
Change in Demographics	1.000	1.000
Change in Network	1.000	0.951
Change in Benefits	1.000	1.000
Change in Other	1.000	1.000
Total Adjusted Projected Allowed EIB Claims PMPM	\$ 564.57	\$ 564.57
Credibility Factors	8%	100%
Blended Projected EIB Claims PMPM	\$ 564.57	\$ 564.57
Development of the Market-Adjusted Index Rate and Total Allowed Claims		
Adjusted Projected Allowed EIB Claims PMPM	\$ 564.57	
Projected Fee to Allowed Ratio	0.718%	
Projected Insured EIB Claims PMPM	\$ 406.79	
Market-Adjusted Adjustments		
Projected Insured Risk Adjustment PMPM	\$12.00	
Projected Insured Exchange User Fee PMPM	\$0.00	
Projected Insured Reinsurance Recoveries PMPM	\$0.00	
Market-Adjusted Projected Insured EIB Claims PMPM	\$ 406.79	
Market-Adjusted Projected Allowed EIB Claims PMPM	\$ 565.05	
Projected Allowed Non-EIB Claims PMPM	\$ 5.00	
Market-Adjusted Projected Insured Total Claims PMPM	\$ 406.79	
Market-Adjusted Projected Allowed Total Claims PMPM	\$ 565.05	

Table 6. Retention

Retentions/Expenses in percentage	Percentage	PMPM Amounts
Administrative Expenses	0.133%	\$66.89
General and Claims	0.17%	\$53.84
Agent/Broker Fees and Commissions	0.07%	\$28.00
Quality Improvement Initiatives	0.00%	\$4.55
Taxes and Fees	0.07%	\$5.35
Risk Adjustment User Fee	0.00%	\$0.23
PCRB Fee	0.00%	\$0.00
PA Premium & Other Taxes (if applicable)	0.00%	\$0.00
Federal Income Tax	0.01%	\$2.88
Health Insurance Provider Fee (Projected for Small Groups only)	0.00%	\$0.00
Profit/Contingency (after tax)	1.01%	\$10.78
Total Retention	17.84%	\$100.51
Projected Required Revenue PMPM		\$ 565.07

Table 8. Components of Rate Change

Rate Components	2021	2022	Difference	Percent Change
A. Calibrated Plan Adjusted Index Rate (PMPM)	\$ 362.50	\$ 375.14	\$ 12.64	3.49%
B. New period allowed claims before normalization	\$ 465.85	\$ 471.36	\$ 5.51	1.1%
C. Normalization factor component of change	\$ (138.05)	\$ (161.51)	\$ (23.51)	-1.0%
D. Change in Normalized Allowed Claims Adjustment Components				
01. UEBT Trend	\$ 307.89	\$ 309.85	\$ 1.91	0.1%
02. UEBT Trend	\$ 39.50	\$ 14.34	\$ -24.76	-4.1%
03. UEBT Mortality	\$ 3.47	\$ 18.63	\$ 15.46	4.4%
04. UEBT Other	\$ 3.80	\$ (11.80)	\$ (15.70)	-4.1%
05. Normalized UEBT Risk Adjustment on an allowed basis	\$ 22.56	\$ 18.89	\$ (3.65)	-1.6%
06. Normalized Exchange User Fee on an allowed basis	\$ -	\$ -	\$ -	0.0%
07. Normalized Reinsurance Recoveries on an allowed basis	\$ -	\$ -	\$ -	0.0%
08. Subtotal - Sum(01-07)	\$ 377.22	\$ 389.82	\$ 12.60	3.3%
E. Change in Allowable Plan Adjusted Level Components				
E1. Network	\$ -7.7	\$ 0.00	\$ 7.70	0.0%
E2. Pricing IV	\$ 82.89	\$ 88.98	\$ 6.09	0.6%
E3. Benefit Richness	\$ 0.00	\$ 0.00	\$ 0.00	0.0%
E4. Catastrophe Eligibility	\$ -	\$ -	\$ -	0.0%
E5. Subtotal - Sum(E1-E4)	\$ 82.89	\$ 88.98	\$ 6.09	0.6%
F. Change in Retention Components				
F1. Administrative Expenses	\$ 57.09	\$ 57.53	\$ 0.44	0.1%
F2. Taxes and Fees	\$ 1.82	\$ 2.23	\$ 0.41	0.2%
F3. Profit and/or Contingency	\$ 7.26	\$ 7.17	\$ (0.09)	0.0%
F4. Subtotal - Sum(F1-F3)	\$ 66.17	\$ 66.93	\$ 0.77	0.2%
G. Change in Miscellaneous Items	\$ -	\$ -	\$ -	0.0%
H. Sum of Components of Rate Change (should approximate the change shown in line A)	\$ 362.50	\$ 368.50	\$ 6.00	2.2%

For Informational Purposes only - No input required.

Standard Base Period Unadjusted Claims before Normalization	\$ 471.35	= Index Rate of Experience Period on UEBT
Standard Earned Premium	\$ 1,302,280,239.95	
Standard Loss Ratio	72.52%	

Table 5A. Small Group Projected Index Rate with Quarterly Trend

Effective Date	1/1/2022	4/1/2022	7/1/2022	10/1/2022	Total Small Group Risk Pool
# of Member Months Remaining in Quarter	440,814	364,268	218,996	84,474	1,108,552
Adjusted Projected Allowed EIB Claims PMPM	\$ 564.57	\$ 564.57	\$ 564.57	\$ 564.57	\$ 564.57
Months of Trend	6.34%	6.34%	6.34%	6.34%	6.34%
Annual Trend	\$ 564.57	\$ 575.04	\$ 581.04	\$ 590.34	\$ 576.30
Single Risk Pool Projected Allowed Claims	\$ 564.57	\$ 575.04	\$ 581.04	\$ 590.34	\$ 576.30
Quarterly Trend Factor	1.000	1.000	1.000	1.000	1.000

Table 7. Normalized Market-Adjusted Projected Allowed Total Claims

Normalization Factors	2021	2022
Normal Age Factor	1.000	1.000
Average Geographic Factor	1.000	1.000
Average Tobacco Indicator	1.000	1.000
Average Benefit Richness (Induced demand)	1.000	1.000
Average Network Factor	1.000	1.000
Market-Adjusted Projected Allowed Total Claims PMPM	\$ 576.20	\$ 598.15
Normalized Market-Adjusted Projected Allowed Total Claims PMPM	\$ 380.81	\$ 398.15

Table 9. Year-over-Year Data to Support Table 8

	2021	2022
Paid-to-Allowed	0.76%	0.77%
UEBT Trend (Total Applied Trend Factor)	1.13%	1.17%
UEBT Mortality	1.01%	1.02%
UEBT Other	1.01%	0.98%
Risk Adjustment	16.16%	22.00%
Exchange User Fee	-	-
Reinsurance Recoveries	-	-
Capitation	-	-
Network	1.00%	1.00%
Pricing IV	0.76%	0.77%
Benefit Richness	1.00%	1.00%
Catastrophe Eligibility	1.00%	1.00%
Administrative Expenses	16.27%	15.58%
Taxes and Fees	0.00%	0.00%
Profit and/or Contingency	0.00%	1.00%

PA Rate Template Part III
Table 10. Plan Rates

Carrier Name:	Keystone Health Plan East
Product(s):	HMO
Market Segment:	Small Group
Rate Effective Date:	1/1/2022
Base Period Start Date	1/1/2020
Date of Most Recent Membership:	2/1/2021
Market Adjusted Index Rate:	\$ 593.01

Calibration	
Age Calibration Factor	1.530
Geographic Calibration Factor	1.000
Tobacco Calibration Factor	1.008
Aggregate Calibration Factor	1.521

Total Covered Lives @ 02-01-2021
103,318

[illegible][illegible][illegible][illegible]

PA Rate Template Part IV B - Small Group Annual
Table 12. Plan Premium Development for 21-Year-Old Non-Tobacco User

Carrier Name:	GryDyne Health Plan Ltd
Product(s):	HMCO
Market Segment:	Small Group
Rate Effective Date:	1/1/2022

[illegible]

PA Rate Quarterly Template Part V Consumer Factors

Carrier Name:	Keystone Health Plan East
Product(s):	HMO
Market Segment:	Small Group
Rate Effective Date:	1/1/2022

Table 12. Age and Tobacco Factors

Age Band	Age Factor	Tobacco Factor	Age Band	Age Factor	Tobacco Factor
0-14	0.765		40	1.278	1.225
15	0.833		41	1.302	1.225
16	0.859		42	1.325	1.225
17	0.885		43	1.357	1.225
18	0.913	1.000	44	1.397	1.225
19	0.941	1.000	45	1.444	1.225
20	0.970	1.000	46	1.500	1.225
21	1.000	1.125	47	1.563	1.225
22	1.000	1.125	48	1.635	1.225
23	1.000	1.125	49	1.706	1.225
24	1.000	1.125	50	1.786	1.375
25	1.004	1.125	51	1.865	1.375
26	1.024	1.125	52	1.952	1.375
27	1.048	1.125	53	2.040	1.375
28	1.087	1.125	54	2.135	1.375
29	1.119	1.125	55	2.230	1.375
30	1.135	1.175	56	2.333	1.375
31	1.159	1.175	57	2.437	1.375
32	1.183	1.175	58	2.548	1.375
33	1.198	1.175	59	2.603	1.375
34	1.214	1.175	60	2.714	1.375
35	1.222	1.175	61	2.810	1.375
36	1.230	1.175	62	2.873	1.375
37	1.238	1.175	63	2.952	1.375
38	1.246	1.175	64+	3.000	1.375
39	1.262	1.175			

*PA follows the federal default age curve.

Table 13. Geographic Factors

Geographic Area Factors			
Area	Counties	Current Factor	Proposed Factor
Rating Area 1			
Rating Area 2			
Rating Area 3			
Rating Area 4			
Rating Area 5			
Rating Area 6			
Rating Area 7			
Rating Area 8	Bucks, Chester, Delaware, Philadelphia, Montgomery	1.000	1.000
Rating Area 9			

Table 14. Network Factors[illegible]

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**Keystone Health Plan East
Small Group
Plan Design Summary**

HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
33871PA0100020	Keystone HMO Platinum Preferred \$10/\$20/\$200	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0100021	Keystone HMO Platinum Preferred \$20/\$40/\$250	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0100022	Keystone HMO Gold Preferred \$40/\$80/\$650	HMO	Gold	Off	Keystone	8	Philadelphia
33871PA0100023	Keystone HMO Gold Classic \$1,500/\$30/\$60/90%	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0100024	Keystone HMO Silver Classic \$4,750/\$30/\$60/70%	HMO	Silver	Off	Keystone	8	Philadelphia
33871PA0100025	Keystone HMO Silver Classic \$3,750/\$30/\$60/50%	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0100026	Keystone HMO Bronze Essential \$7,500/\$70/\$140/	HMO	Bronze	Off	Keystone	8	Philadelphia
33871PA0100044	Keystone HMO Gold Proactive	HMO	Gold	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery,
33871PA0100045	Keystone HMO Silver Proactive	HMO	Silver	Off	Proactive	8	Philadelphia
33871PA0100047	Keystone HMO Gold Classic \$2,500/\$40/\$80/100%	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0100048	Keystone HMO Silver Classic \$4,500/\$50/\$100/100	HMO	Silver	Off	Keystone	8	Philadelphia
33871PA0100049	Keystone HMO Silver Secure \$5,000/\$50/\$100/\$60	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0100050	Keystone HMO Platinum Preferred \$30/\$60/\$400	HMO	Platinum	Off	Keystone	8	Philadelphia
33871PA0100051	Keystone HMO Gold Secure \$1000/\$40/\$80/\$650	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0100052	Keystone HMO Silver Proactive Value	HMO	Silver	Off	Proactive	8	Philadelphia
33871PA0100053	Keystone HMO Platinum Preferred \$5/\$15/\$500	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0110011	Keystone DPOS Platinum Preferred \$10/\$20/\$200	POS	Platinum	Off	Keystone	8	Philadelphia
33871PA0110012	Keystone DPOS Platinum Preferred \$20/\$40/\$250	POS	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0110013	Keystone DPOS Gold Preferred \$40/\$80/\$650	POS	Gold	Off	Keystone	8	Philadelphia
33871PA0110014	Keystone DPOS Gold Classic \$1,500/\$30/\$60/90%	POS	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0110019	Keystone DPOS Silver Classic \$3,750/\$30/\$60/50%	POS	Silver	Off	Keystone	8	Philadelphia
33871PA0110020	Keystone DPOS Bronze Essential \$7,500/\$70/\$140/	POS	Bronze	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
							Philadelphia

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[illegible]

Company Name	Market	Product	Effective Date of Rates	Ending date of Rates	Contract
HSD (New Gold Excludes)					
14	548048	548048	548048	548048	548048
15	548049	548049	548049	548049	548049
16	548050	548050	548050	548050	548050
17	548051	548051	548051	548051	548051
18	548052	548052	548052	548052	548052
19	548053	548053	548053	548053	548053
20	548054	548054	548054	548054	548054
21	548055	548055	548055	548055	548055
22	548056	548056	548056	548056	548056
23	548057	548057	548057	548057	548057
24	548058	548058	548058	548058	548058
25	548059	548059	548059	548059	548059
26	548060	548060	548060	548060	548060
27	548061	548061	548061	548061	548061
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29	548063	548063	548063	548063	548063
30	548064	548064	548064	548064	548064
31	548065	548065	548065	548065	548065
32	548066	548066	548066	548066	548066
33	548067	548067	548067	548067	548067
34	548068	548068	548068	548068	548068
35	548069	548069	548069	548069	548069
36	548070	548070	548070	548070	548070
37	548071	548071	548071	548071	548071
38	548072	548072	548072	548072	548072
39	548073	548073	548073	548073	548073
40	548074	548074	548074	548074	548074
41	548075	548075	548075	548075	548075
42	548076	548076	548076	548076	548076
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44	548078	548078	548078	548078	548078
45	548079	548079	548079	548079	548079
46	548080	548080	548080	548080	548080
47	548081	548081	548081	548081	548081
48	548082	548082	548082	548082	548082
49	548083	548083	548083	548083	548083
50	548084	548084	548084	548084	548084
51	548085	548085	548085	548085	548085
52	548086	548086	548086	548086	548086
53	548087	548087	548087	548087	548087
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56	548090	548090	548090	548090	548090
57	548091	548091	548091	548091	548091
58	548092	548092	548092	548092	548092
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65	548099	548099	548099	548099	548099
66	548100	548100	548100	548100	548100
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69	548103	548103	548103	548103	548103
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71	548105	548105	548105	548105	548105
72	548106	548106	548106	548106	548106
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74	548108	548108	548108	548108	548108
75	548109	548109	548109	548109	548109
76	548110	548110	548110	548110	548110
77	548111	548111	548111	548111	548111
78	548112	548112	548112	548112	548112
79	548113	548113	548113	548113	548113
80	548114	548114	548114	548114	548114
81	548115	548115	548115	548115	548115
82	548116	548116	548116	548116	548116
83	548117	548117	548117	548117	548117
84	548118	548118	548118	548118	548118
85	548119	548119	548119	548119	548119
86	548120	548120	548120	548120	548120
87	548121	548121	548121	548121	548121
88	548122	548122	548122	548122	548122
89	548123	548123	548123	548123	548123
90	548124	548124	548124	548124	548124
91	548125	548125	548125	548125	548125
92	548126	548126	548126	548126	548126
93	548127	548127	548127	548127	548127
94	548128	548128	548128	548128	548128
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96	548130	548130	548130	548130	548130
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98	548132	548132	548132	548132	548132
99	548133	548133	548133	548133	548133
100	548134	548134	548134	548134	548134

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HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
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33871PA0100021	Keystone HMO Platinum Preferred \$20/\$40/\$250	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100022	Keystone HMO Gold Preferred \$40/\$80/\$650	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100023	Keystone HMO Gold Classic \$1,500/\$30/\$60/90%	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100024	Keystone HMO Silver Classic \$4,750/\$30/\$60/70%	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100025	Keystone HMO Silver Classic \$3,750/\$30/\$60/50%	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100026	Keystone HMO Bronze Essential \$7,500/\$70/\$140/	HMO	Bronze	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100044	Keystone HMO Gold Proactive	HMO	Gold	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100045	Keystone HMO Silver Proactive	HMO	Silver	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100047	Keystone HMO Gold Classic \$2,500/\$40/\$80/100%	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
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33871PA0100051	Keystone HMO Gold Secure \$1000/\$40/\$80/\$650	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100052	Keystone HMO Silver Proactive Value	HMO	Silver	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
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33871PA0110011	Keystone DPOS Platinum Preferred \$10/\$20/\$200	POS	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110012	Keystone DPOS Platinum Preferred \$20/\$40/\$250	POS	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110013	Keystone DPOS Gold Preferred \$40/\$80/\$650	POS	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110014	Keystone DPOS Gold Classic \$1,500/\$30/\$60/90%	POS	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110019	Keystone DPOS Silver Classic \$3,750/\$30/\$60/50%	POS	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110020	Keystone DPOS Bronze Essential \$7,500/\$70/\$140/	POS	Bronze	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia

Company Name	Keystone Health Plan East
Market	Small Group

[illegible]

[illegible]

**Keystone Health Plan East
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Plan Design Summary**

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33871PA0100023	Keystone HMO Gold Classic \$1,500/\$30/\$60/90%	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100024	Keystone HMO Silver Classic \$4,750/\$30/\$60/70%	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100025	Keystone HMO Silver Classic \$3,750/\$30/\$60/50%	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100026	Keystone HMO Bronze Essential \$7,500/\$70/\$140/	HMO	Bronze	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100044	Keystone HMO Gold Proactive	HMO	Gold	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100045	Keystone HMO Silver Proactive	HMO	Silver	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100047	Keystone HMO Gold Classic \$2,500/\$40/\$80/100%	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100048	Keystone HMO Silver Classic \$4,500/\$50/\$100/100	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100049	Keystone HMO Silver Secure \$5,000/\$50/\$100/\$60	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100050	Keystone HMO Platinum Preferred \$30/\$60/\$400	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100051	Keystone HMO Gold Secure \$1000/\$40/\$80/\$650	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100052	Keystone HMO Silver Proactive Value	HMO	Silver	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100053	Keystone HMO Platinum Preferred \$5/\$15/\$500	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110011	Keystone DPOS Platinum Preferred \$10/\$20/\$200	POS	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
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33871PA0110013	Keystone DPOS Gold Preferred \$40/\$80/\$650	POS	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110014	Keystone DPOS Gold Classic \$1,500/\$30/\$60/90%	POS	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110019	Keystone DPOS Silver Classic \$3,750/\$30/\$60/50%	POS	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110020	Keystone DPOS Bronze Essential \$7,500/\$70/\$140/	POS	Bronze	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia

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Q4 2022: Number of Completed Cases by Rating Category										RATING: 1 (1-5)					RATING: 2 (1-5)					RATING: 3 (1-5)					RATING: 4 (1-5)					RATING: 5 (1-5)					RATING: 6 (1-5)					RATING: 7 (1-5)					RATING: 8 (1-5)					RATING: 9 (1-5)					RATING: 10 (1-5)																																																																																																																																																																																																																																																																																																																
Q4 2022	Q4 2021	Q4 2020	Q4 2019	Q4 2018	Q4 2017	Q4 2016	Q4 2015	Q4 2014	Q4 2013	Q4 2012	Q4 2011	Q4 2010	Q4 2009	Q4 2008	Q4 2007	Q4 2006	Q4 2005	Q4 2004	Q4 2003	Q4 2002	Q4 2001	Q4 2000	Q4 1999	Q4 1998	Q4 1997	Q4 1996	Q4 1995	Q4 1994	Q4 1993	Q4 1992	Q4 1991	Q4 1990	Q4 1989	Q4 1988	Q4 1987	Q4 1986	Q4 1985	Q4 1984	Q4 1983	Q4 1982	Q4 1981	Q4 1980	Q4 1979	Q4 1978	Q4 1977	Q4 1976	Q4 1975	Q4 1974	Q4 1973	Q4 1972	Q4 1971	Q4 1970	Q4 1969	Q4 1968	Q4 1967	Q4 1966	Q4 1965	Q4 1964	Q4 1963	Q4 1962	Q4 1961	Q4 1960	Q4 1959	Q4 1958	Q4 1957	Q4 1956	Q4 1955	Q4 1954	Q4 1953	Q4 1952	Q4 1951	Q4 1950	Q4 1949	Q4 1948	Q4 1947	Q4 1946	Q4 1945	Q4 1944	Q4 1943	Q4 1942	Q4 1941	Q4 1940	Q4 1939	Q4 1938	Q4 1937	Q4 1936	Q4 1935	Q4 1934	Q4 1933	Q4 1932	Q4 1931	Q4 1930	Q4 1929	Q4 1928	Q4 1927	Q4 1926	Q4 1925	Q4 1924	Q4 1923	Q4 1922	Q4 1921	Q4 1920	Q4 1919	Q4 1918	Q4 1917	Q4 1916	Q4 1915	Q4 1914	Q4 1913	Q4 1912	Q4 1911	Q4 1910	Q4 1909	Q4 1908	Q4 1907	Q4 1906	Q4 1905	Q4 1904	Q4 1903	Q4 1902	Q4 1901	Q4 1900	Q4 1899	Q4 1898	Q4 1897	Q4 1896	Q4 1895	Q4 1894	Q4 1893	Q4 1892	Q4 1891	Q4 1890	Q4 1889	Q4 1888	Q4 1887	Q4 1886	Q4 1885	Q4 1884	Q4 1883	Q4 1882	Q4 1881	Q4 1880	Q4 1879	Q4 1878	Q4 1877	Q4 1876	Q4 1875	Q4 1874	Q4 1873	Q4 1872	Q4 1871	Q4 1870	Q4 1869	Q4 1868	Q4 1867	Q4 1866	Q4 1865	Q4 1864	Q4 1863	Q4 1862	Q4 1861	Q4 1860	Q4 1859	Q4 1858	Q4 1857	Q4 1856	Q4 1855	Q4 1854	Q4 1853	Q4 1852	Q4 1851	Q4 1850	Q4 1849	Q4 1848	Q4 1847	Q4 1846	Q4 1845	Q4 1844	Q4 1843	Q4 1842	Q4 1841	Q4 1840	Q4 1839	Q4 1838	Q4 1837	Q4 1836	Q4 1835	Q4 1834	Q4 1833	Q4 1832	Q4 1831	Q4 1830	Q4 1829	Q4 1828	Q4 1827	Q4 1826	Q4 1825	Q4 1824	Q4 1823	Q4 1822	Q4 1821	Q4 1820	Q4 1819	Q4 1818	Q4 1817	Q4 1816	Q4 1815	Q4 1814	Q4 1813	Q4 1812	Q4 1811	Q4 1810	Q4 1809	Q4 1808	Q4 1807	Q4 1806	Q4 1805	Q4 1804	Q4 1803	Q4 1802	Q4 1801	Q4 1800	Q4 1799	Q4 1798	Q4 1797	Q4 1796	Q4 1795	Q4 1794	Q4 1793	Q4 1792	Q4 1791	Q4 1790	Q4 1789	Q4 1788	Q4 1787	Q4 1786	Q4 1785	Q4 1784	Q4 1783	Q4 1782	Q4 1781	Q4 1780	Q4 1779	Q4 1778	Q4 1777	Q4 1776	Q4 1775	Q4 1774	Q4 1773	Q4 1772	Q4 1771	Q4 1770	Q4 1769	Q4 1768	Q4 1767	Q4 1766	Q4 1765	Q4 1764	Q4 1763	Q4 1762	Q4 1761	Q4 1760	Q4 1759	Q4 1758	Q4 1757	Q4 1756	Q4 1755	Q4 1754	Q4 1753	Q4 1752	Q4 1751	Q4 1750	Q4 1749	Q4 1748	Q4 1747	Q4 1746	Q4 1745	Q4 1744	Q4 1743	Q4 1742	Q4 1741	Q4 1740	Q4 1739	Q4 1738	Q4 1737	Q4 1736	Q4 1735	Q4 1734	Q4 1733	Q4 1732	Q4 1731	Q4 1730	Q4 1729	Q4 1728	Q4 1727	Q4 1726	Q4 1725																																																														
Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project Name	Project

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**Keystone Health Plan East
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Plan Design Summary**

HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
33871PA0100020	Keystone HMO Platinum Preferred \$10/\$20/\$200	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery,
33871PA0100021	Keystone HMO Platinum Preferred \$20/\$40/\$250	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100022	Keystone HMO Gold Preferred \$40/\$80/\$650	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100023	Keystone HMO Gold Classic \$1,500/\$30/\$60/90%	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100024	Keystone HMO Silver Classic \$4,750/\$30/\$60/70%	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100025	Keystone HMO Silver Classic \$3,750/\$30/\$60/50%	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100026	Keystone HMO Bronze Essential \$7,500/\$70/\$140/	HMO	Bronze	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100044	Keystone HMO Gold Proactive	HMO	Gold	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100045	Keystone HMO Silver Proactive	HMO	Silver	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100047	Keystone HMO Gold Classic \$2,500/\$40/\$80/100%	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100048	Keystone HMO Silver Classic \$4,500/\$50/\$100/100	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100049	Keystone HMO Silver Secure \$5,000/\$50/\$100/\$60	HMO	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100050	Keystone HMO Platinum Preferred \$30/\$60/\$400	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100051	Keystone HMO Gold Secure \$1000/\$40/\$80/\$650	HMO	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100052	Keystone HMO Silver Proactive Value	HMO	Silver	Off	Proactive	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0100053	Keystone HMO Platinum Preferred \$5/\$15/\$500	HMO	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110011	Keystone DPOS Platinum Preferred \$10/\$20/\$200	POS	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110012	Keystone DPOS Platinum Preferred \$20/\$40/\$250	POS	Platinum	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110013	Keystone DPOS Gold Preferred \$40/\$80/\$650	POS	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110014	Keystone DPOS Gold Classic \$1,500/\$30/\$60/90%	POS	Gold	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110019	Keystone DPOS Silver Classic \$3,750/\$30/\$60/50%	POS	Silver	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
33871PA0110020	Keystone DPOS Bronze Essential \$7,500/\$70/\$140/	POS	Bronze	Off	Keystone	8	Bucks, Chester, Delaware, Montgomery, Philadelphia

Company Name Keystone Health Plan East
Market Small Group
RATES FOR AGE 21, NON-TOBACCO USER, BY RATING AREA AND COUNTY

[illegible]

12/1/2022

PA

Small Group

To add a product to Worksheet 2 - Plan Product Info, select the Add Product button or Ctrl + Shift + P.
To add a plan to Worksheet 2 - Plan Product Info, select the Add Plan button or Ctrl + Shift + L.
To validate, select the Validate button or Ctrl + Shift + I.
To finalize, select the Finalize button or Ctrl + Shift + F.

Unified Rate Review v5.3

Company Legal Name: Keystone Health Plan East

HIOS Issuer ID: 33871

Effective Date of Rate Change(s): 1/1/2022

State: PA

Market: Small Group

Market Level Calculations (Same for all Plans)

Section I: Experience Period Data

Experience Period: 1/1/2020 to 12/31/2020

	Total	PMPM
Allowed Claims	\$574,195,444.52	\$446.57
Reinsurance	\$0.00	\$0.00
Incurred Claims in Experience Period	\$497,432,181.01	\$386.87
Risk Adjustment	-\$14,189,948.86	-\$11.04
Experience Period Premium	\$666,417,701.50	\$518.30
Experience Period Member Months	1,285,783	

Section II: Projections

Benefit Category	Experience Period Index Rate PMPM	Year 1 Trend		Year 2 Trend		Trended EHB Allowed Claims PMPM
		Cost	Utilization	Cost	Utilization	
Inpatient Hospital	\$84.55	1.031	1.114	1.031	1.114	\$111.53
Outpatient Hospital	\$72.84	1.030	1.114	1.030	1.114	\$95.90
Professional	\$105.59	1.022	1.114	1.022	1.114	\$136.87
Other Medical	\$0.00	1.022	1.114	1.022	1.114	\$0.00
Capitation	\$85.10	1.000	0.887	1.000	0.887	\$66.95
Prescription Drug	\$98.50	0.995	1.114	0.995	1.114	\$121.02
Total	\$446.58					\$532.27

Morbidity Adjustment	1.052
Demographic Shift	1.009
Plan Design Changes	1.000
Other	0.998
Adjusted Trended EHB Allowed Claims PMPM for 1/1/2022	\$563.86
Manual EHB Allowed Claims PMPM	\$564.57
Applied Credibility %	0.00%

Projected Period Totals

Projected Index Rate for 1/1/2022	\$564.57	\$699,962,919.12
Reinsurance	\$0.00	\$0.00
Risk Adjustment Payment/Charge	-\$28.44	-\$35,260,367.04
Exchange User Fees	0.00%	\$0.00
Market Adjusted Index Rate	\$593.01	\$735,223,286.16
Projected Member Months	1,239,816	

Information Not Releasable to the Public Unless Authorized by Law: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

Product-Plan Data Collection

Company Legal Name:

Keystone Health Plan East

HIOS Issuer ID:

33871

Effective Date of Rate Change(s):

1/1/2022

State:

PA

Market

Small Group

To add a product to Worksheet 2 - Plan Product Info, select the Add Product button or Ctrl + Shift + P.

To add a plan to Worksheet 2 - Plan Product Info, select the Add Plan button or Ctrl + Shift +

To validate, select the **Validate** button or **Ctrl + Shift + L**.

To finalize, select the **Finalize** button or **Ctrl + Shift + F**.

To remove a product, navigate to the corresponding Product Name/Product ID field and select the Remove Product button or Ctrl + Shift + Q

To remove a plan, navigate to the corresponding Plan Name/Plan ID field and select the Remove Plan button or Ctrl + Shift + A.

Product/Plan Level Calculations

World 5 - Section 1 - General Product and Plan Information		Keystone OPGS Small Group																								Keystone OPGS Small Group																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
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HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone 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HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	Keystone HMO	

Worksheet: Totals		Section II: Experience Period and Current Plan Life Information		Total		3/31/14PA000021		3/31/14PA000022		3/31/14PA000023		3/31/14PA000024		3/31/14PA000025		3/31/14PA000026		3/31/14PA000027		3/31/14PA000028		3/31/14PA000029		3/31/14PA000030		3/31/14PA000031		3/31/14PA000032		3/31/14PA000033		3/31/14PA000034		3/31/14PA000035		3/31/14PA000036		3/31/14PA000037		3/31/14PA000038		3/31/14PA000039		3/31/14PA000040		3/31/14PA000041		3/31/14PA000042		3/31/14PA000043		3/31/14PA000044		3/31/14PA000045		3/31/14PA000046		3/31/14PA000047		3/31/14PA000048		3/31/14PA000049		3/31/14PA000050		3/31/14PA000051		3/31/14PA000052		3/31/14PA000053		3/31/14PA000054		3/31/14PA000055		3/31/14PA000056		3/31/14PA000057		3/31/14PA000058		3/31/14PA000059		3/31/14PA000060		3/31/14PA000061		3/31/14PA000062		3/31/14PA000063		3/31/14PA000064		3/31/14PA000065		3/31/14PA000066		3/31/14PA000067		3/31/14PA000068		3/31/14PA000069		3/31/14PA000070		3/31/14PA000071		3/31/14PA000072		3/31/14PA000073		3/31/14PA000074		3/31/14PA000075		3/31/14PA000076		3/31/14PA000077		3/31/14PA000078		3/31/14PA000079		3/31/14PA000080		3/31/14PA000081		3/31/14PA000082		3/31/14PA000083		3/31/14PA000084		3/31/14PA000085		3/31/14PA000086		3/31/14PA000087		3/31/14PA000088		3/31/14PA000089		3/31/14PA000090		3/31/14PA000091		3/31/14PA000092		3/31/14PA000093		3/31/14PA000094		3/31/14PA000095		3/31/14PA000096		3/31/14PA000097		3/31/14PA000098		3/31/14PA000099		3/31/14PA000100		3/31/14PA000101		3/31/14PA000102		3/31/14PA000103		3/31/14PA000104		3/31/14PA000105		3/31/14PA000106		3/31/14PA000107		3/31/14PA000108		3/31/14PA000109		3/31/14PA000110		3/31/14PA000111		3/31/14PA000112		3/31/14PA000113		3/31/14PA000114		3/31/14PA000115		3/31/14PA000116		3/31/14PA000117		3/31/14PA000118		3/31/14PA000119		3/31/14PA000120		3/31/14PA000121		3/31/14PA000122		3/31/14PA000123		3/31/14PA000124		3/31/14PA000125		3/31/14PA000126		3/31/14PA000127		3/31/14PA000128		3/31/14PA000129		3/31/14PA000130		3/31/14PA000131		3/31/14PA000132		3/31/14PA000133		3/31/14PA000134		3/31/14PA000135		3/31/14PA000136		3/31/14PA000137		3/31/14PA000138		3/31/14PA000139		3/31/14PA000140		3/31/14PA000141		3/31/14PA000142		3/31/14PA000143		3/31/14PA000144		3/31/14PA000145		3/31/14PA000146		3/31/14PA000147		3/31/14PA000148		3/31/14PA000149		3/31/14PA000150		3/31/14PA000151		3/31/14PA000152		3/31/14PA000153		3/31/14PA000154		3/31/14PA000155		3/31/14PA000156		3/31/14PA000157		3/31/14PA000158		3/31/14PA000159		3/31/14PA000160		3/31/14PA000161		3/31/14PA000162		3/31/14PA000163		3/31/14PA000164		3/31/14PA000165		3/31/14PA000166		3/31/14PA000167		3/31/14PA000168		3/31/14PA000169		3/31/14PA000170		3/31/14PA000171		3/31/14PA000172		3/31/14PA000173		3/31/14PA000174		3/31/14PA000175		3/31/14PA000176		3/31/14PA000177		3/31/14PA000178		3/31/14PA000179		3/31/14PA000180		3/31/14PA000181		3/31/14PA000182		3/31/14PA000183		3/31/14PA000184		3/31/14PA000185		3/31/14PA000186		3/31/14PA000187		3/31/14PA000188		3/31/14PA000189		3/31/14PA000190		3/31/14PA000191		3/31/14PA000192		3/31/14PA000193		3/31/14PA000194		3/31/14PA000195		3/31/14PA000196		3/31/14PA000197		3/31/14PA000198		3/31/14PA000199		3/31/14PA000200		3/31/14PA000201		3/31/14PA000202		3/31/14PA000203		3/31/14PA000204		3/31/14PA000205		3/31/14PA000206		3/31/14PA000207		3/31/14PA000208		3/31/14PA000209		3/31/14PA000210		3/31/14PA000211		3/31/14PA000212		3/31/14PA000213		3/31/14PA000214		3/31/14PA000215		3/31/14PA000216		3/31/14PA000217		3/31/14PA000218		3/31/14PA000219		3/31/14PA000220		3/31/14PA000221		3/31/14PA000222		3/31/14PA000223		3/31/14PA000224		3/31/14PA000225		3/31/14PA000226		3/31/14PA000227		3/31/14PA000228		3/31/14PA000229		3/31/14PA000230		3/31/14PA000231		3/31/14PA000232		3/31/14PA000233		3/31/14PA000234		3/31/14PA000235		3/31/14PA000236		3/31/14PA000237		3/31/14PA000238		3/31/14PA000239		3/31/14PA000240		3/31/14PA000241		3/31/14PA000242		3/31/14PA000243		3/31/14PA000244		3/31/14PA000245		3/31/14PA000246		3/31/14PA000247		3/31/14PA000248		3/31/14PA000249		3/31/14PA000250		3/31/14PA000251		3/31/14PA000252		3/31/14PA000253		3/31/14PA000254		3/31/14PA000255		3/31/14PA000256		3/31/14PA000257		3/31/14PA000258		3/31/14PA000259		3/31/14PA000260		3/31/14PA000261		3/31/14PA000262		3/31/14PA000263		3/31/14PA000264		3/31/14PA000265		3/31/14PA000266		3/31/14PA000267		3/31/14PA000268		3/31/14PA000269		3/31/14PA000270		3/31/14PA000271		3/31/14PA000272		3/31/14PA000273		3/31/14PA000274		3/31/14PA000275		3/31/14PA000276		3/31/14PA000277		3/31/14PA000278		3/31/14PA000279		3/31/14PA000280		3/31/14PA000281		3/31/14PA000282		3/31/14PA000283		3/31/14PA000284		3/31/14PA000285		3/31/14PA000286		3/31/14PA000287		3/31/14PA000288		3/31/14PA000289		3/31/14PA000290		3/31/14PA000291		3/31/14PA000292		3/31/14PA000293		3/31/14PA000294		3/31/14PA000295		3/31/14PA000296		3/31/14PA000297		3/31/14PA000298		3/31/14PA000299		3/31/14PA000300		3/31/14PA000301		3/31/14PA000302		3/31/14PA000303		3/31/14PA000304		3/31/14PA000305		3/31/14PA000306		3/31/14PA000307		3/31/14PA000308		3/31/14PA000309		3/31/14PA000310		3/31/14PA000311		3/31/14PA000312		3/31/14PA000313		3/31/14PA000314		3/31/14PA000315		3/31/14PA000316		3/31/14PA000317		3/31/14PA000318		3/31/14PA000319		3/31/14PA000320		3/31/14PA000321		3/31/14PA000322		3/31/14PA000323		3/31/14PA000324		3/31/14PA000325		3/31/14PA000326		3/31/14PA000327		3/31/14PA000328		3/31/14PA000329		3/31/14PA000330		3/31/14PA000331		3/31/14PA000332		3/31/14PA000333		3/31/14PA000334		3/31/14PA000335		3/31/14PA000336		3/31/14PA000337		3/31/14PA000338		3/31/14PA000339		3/31/14PA000340		3/31/14PA000341		3/31/14PA000342		3/31/14PA000343		3/31/14PA000344		3/31/14PA000345		3/31/14PA000346		3/31/14PA000347		3/31/14PA000348		3/31/14PA000349		3/31/14PA000350		3/31/14PA000351		3/31/14PA000352		3/31/14PA000353		3/31/14PA000354		3/31/14PA000355		3/31/14PA000356		3/31/14PA000357		3/31/14PA000358		3/31/14PA000359		3/31/14PA000360		3/31/14PA000361		3/31/14PA000362		3/31/14PA000363		3/31/14PA000364		3/31/14PA000365		3/31/14PA000366		3/31/14PA000367		3/31/14PA000368		3/31/14PA000369		3/31/14PA000370		3/31/14PA000371		3/31/14PA000372		3/31/14PA000373		3/31/14PA000374		3/31/14PA000375		3/31/14PA000376		3/31/14PA000377		3/31/14PA000378		3/31/14PA000379		3/31/14PA000380		3/31/14PA000381		3/31/14PA000382		3/31/14PA000383		3/31/14PA000384		3/31/14PA000385		3/31/14PA000386		3/31/14PA000387		3/31/14PA000388		3/31/14PA000389		3/31/14PA000390		3/31/14PA000391		3/31/14PA000392		3/31/14PA000393		3/31/14PA000394		3/31/14PA000395		3/31/14PA000396		3/31/14PA000397		3/31/14PA000398		3/31/14PA000399		3/31/14PA000400		3/31/14PA000401		3/31/14PA000402		3/31/14PA000403		3/31/14PA000404		3/31/14PA000405		3/31/14PA000406		3/31/14PA000407		3/31/14PA000408		3/31/14PA000409		3/31/14PA000410		3/31/14PA000411		3/31/14PA000412		3/31/14PA000413		3/31/14PA000414		3/31/14PA000415		3/31/14PA000416		3/31/14PA000417		3/31/14PA000418		3/31/14PA000419		3/31/14PA000420		3/31/14PA000421		3/31/14PA000422		3/31/14PA000423		3/31/14PA000424		3/31/14PA000425		3/31/14PA000426		3/31/14PA000427		3/31/14PA000428		3/31/14PA000429		3/31/14PA000430		3/31/14PA000431		3/31/14PA000432		3/31/14PA000433		3/31/14PA000434		3/31/14PA000435		3/31/14PA000436		3/31/14PA000437		3/31/14PA000438		3/31/14PA000439		3/31/14PA000440		3/31/14PA000441		3/31/14PA000442		3/31/14PA000443		3/31/14PA000444		3/31/14PA000445		3/31/14PA000446		3/31/14PA000447		3/31/14PA000448		3/31/14PA000449		3/31/14PA000450		3/31/14PA000451		3/31/14PA000452		3/31/14PA000453		3/31/14PA000454		3/31/14PA000455		3/31/14PA000456		3/31/14PA000457		3/31/14PA000458		3/31/14PA000459		3/31/14PA000460		3/31/14PA000461		3/31/14PA000462		3/31/14PA000463		3/31/14PA000464		3/31/14PA000465		3/31/14PA000466		3/31/14PA000467		3/31/14PA000468		3/31/14PA000469		3/31/14PA000470		3/31/14PA000471		3/31/14PA000472		3/31/14PA000473		3/31/14PA000474		3/31/14PA000475		3/31/14PA000476		3/31/14PA000477		3/31/14PA000478		3/31/14PA000479		3/31/14PA000480		3/31/14PA000481		3/31/14PA000482		3/31/14PA000483		3/31/14PA000484		3/31/14PA000485		3/31/14PA000486		3/31/14PA000487		3/31/14PA000488		3/31/14PA000489		3/31/14PA000490		3/31/14PA000491		3/31/14PA000492		3/31/14PA000493		3/31/14PA000494		3/31/14PA000495		3/31/14PA000496		3/31/14PA000497		3/31/14PA000498		3/31/14PA000499		3/31/14PA000500		3/31/14PA000501		3/31/14PA000502		3/31/14PA000503		3/31/14PA000504		3/31/14PA000505		3/31/14PA000506		3/31/14PA000507		3/31/14PA000508		3/31/14PA000509		3/31/14PA000510		3/31/14PA000511		3/31/14PA000512		3/31/14PA000513		3/31/14PA000514		3/31/14PA000515		3/31/14PA000516		3/31/14PA000517		3/31/14PA000518		3/31/14PA000519		3/31/14PA000520		3/31/14PA000521		3/31/14PA000522		3/31/14PA000523		3/31/14PA000524		3/31/14PA000525		3/31/14PA000526		3/31/14PA000527		3/31/14PA000528		3/31/14PA000529		3/31/14PA000530		3/31/14PA000531		3/31/14PA000532		3/31/14PA000533		3/31/14PA000534		3/31/14PA000535		3/31/14PA000536		3/31/14PA000537		3/31/14PA000538		3/31/14PA000539		3/31/14PA000540		3/31/14PA000541		3/31/14PA000542		3/31/14PA000543		3/31/14PA000544		3/31/14PA000545		3/31/14PA000546		3/31/14PA000547		3/31/14PA000548		3/31/14PA000549		3/31/14PA000550		3/31/14PA000551		3/31/14PA000552		3/31/14PA000553		3/31/14PA000554		3/31/14PA000555		3/31/14PA000556		3/31/14PA000557		3/31/14PA000558		3/31/14PA000559		3/31/14PA000560		3/31/14PA000561		3/31/14PA000562		3/31/14PA000563		3/31/14PA000564		3/31/14PA000565		3/31/14PA000566		3/31/14PA000567		3/31/14PA000568		3/31/14PA000569		3/31/14PA000570		3/31/14PA000571		3/31/14PA000572		3/31/14PA000573		3/31/14PA000574		3/31/14PA000575		3/31/14PA000576		3/31/14PA000577		3/31/14PA000578		3/31/14PA000579		3/31/14PA000580		3/31/14PA000581	
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Section III: Plan Adjustment Factors																					
Plan ID	Warranted Component Factor	3.871PAF10A00002	3.871PAF10A00003	3.871PAF10A00004	3.871PAF10A00005	3.871PAF10A00006	3.871PAF10A00007	3.871PAF10A00008	3.871PAF10A00009	3.871PAF10A00010	3.871PAF10A00011	3.871PAF10A00012	3.871PAF10A00013	3.871PAF10A00014	3.871PAF10A00015	3.871PAF10A00016	3.871PAF10A00017	3.871PAF10A00018	3.871PAF10A00019	3.871PAF10A00020	
3.1	Manner-Adjusted Index Rate	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	
3.2	Provider Network Design of Plan	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	
3.3	Avg and Cost Sharing Design of Plan	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	
3.4	Provider Network Design of Plan	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	1.06892	
3.5	Benefit Reduction by Livelihood	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	1.07872	
Administrative Costs																					
3.6	Administration Expense	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	15.34%	
3.7	Plans and Fees	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	0.59%	
3.8	Profit & Risk Load	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	1.91%	
3.9	Congratulatory Incentives	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	1.000%	
3.10	Admin Profit & Risk Load	\$820.12	\$790.79	\$623.13	\$633.91	\$522.15	\$530.39	\$556.20	\$446.70	\$651.16	\$537.11	\$460.05	\$750.08	\$605.56	\$428.64	\$784.99	\$834.54	\$917.07	\$650.55	\$638.06	

[illegible][illegible]

Rating Area Data Collection

Specify the total number of Rating Areas in your State by selecting the Create Rating Areas button or Ctrl + Shift + R.
Select only the Rating Areas you are offering plans within and add a factor for each area.
To validate, select the Validate button or Ctrl + Shift + I.
To finalize, select the Finalize button or Ctrl + Shift + F.

Rating Area	Rating Factor
Rating Area 8	1.0000

URRT Part II – Consumer Friendly Justification

Scope and Range of the Rate Increase:

Keystone Health Plan East ("KHPE") is revising premium rates for the Pennsylvania Small Group ACA compliant products, effective from January 1, 2022. The proposed revisions to each plan are shown on the second page of this exhibit.

About 103,000 members will be affected.

Financial Experience of the Product:

KHPE is required by federal law to pay out a minimum of 80% percent of premium dollars for medical claims—this is referred to as the minimum Medical Loss Ratio (MLR). The rate action proposed in this filing is expected to achieve a Medical Loss Ratio of greater than 80%.

Changes in Taxes and Fees:

The Federal government ended the Health Insurance Providers Fee beginning with premiums due in 2021.

Changes in Medical Service Costs:

Premium rates for health care insurance are increasing as the cost of health care service rise. Health care service costs increase as health care providers increase their fees, members use more health care services and supplies, and the types of health care services and supplies change, among other factors.

We are projecting that claims will increase by 8.4% in 2022. More than half of the change in health care service costs is driven by changes to health care provider fees.

Morbidity was increased by an additional 5.2% to account for the impact of COVID-19 on overall projected claims. This represents the estimated increase for claims returning to more typical levels, which were reduced during the past year due to the pandemic. In addition, trend includes approximately an additional 2.8% to account for higher claims in 2022 related to COVID-related expenses and claims which have been delayed from 2020 and 2021 due to the pandemic.

Changes in Benefits:

Some plan benefits are mandated by federal and state law. Benefit changes for some plans were also made. All changes in benefits are in compliance with the uniform modifications rules stipulated by the Federal government.

Administrative Costs:

The premium rates presented in this filing include a 2% contribution to reserves. Furthermore, the Affordable Care Act (ACA) imposes taxes and other levies.

URRT Part II – Consumer Friendly Justification

HIOS ID	Plan Name	1Q % Change	2Q % Change	3Q % Change	4Q % Change
33871PA0100020	Keystone HMO Platinum Preferred \$10/\$20/\$200	3.3%	3.2%	5.2%	5.1%
33871PA0100021	Keystone HMO Platinum Preferred \$20/\$40/\$250	3.4%	3.3%	5.3%	5.2%
33871PA0100022	Keystone HMO Gold Preferred \$40/\$80/\$650	2.2%	2.1%	4.1%	3.9%
33871PA0100023	Keystone HMO Gold Classic \$1,500/\$30/\$60/90%	2.0%	1.9%	3.9%	3.8%
33871PA0100024	Keystone HMO Silver Classic \$4,750/\$30/\$60/70%	3.2%	3.1%	5.1%	5.0%
33871PA0100025	Keystone HMO Silver Classic \$3,750/\$30/\$60/50%	3.2%	3.1%	5.1%	5.0%
33871PA0100026	Keystone HMO Bronze Essential \$7,500/\$70/\$140/\$700	3.0%	2.9%	4.9%	4.8%
33871PA0110011	Keystone DPOS Platinum Preferred \$10/\$20/\$200	3.5%	3.4%	5.4%	5.3%
33871PA0110012	Keystone DPOS Platinum Preferred \$20/\$40/\$250	3.5%	3.4%	5.4%	5.3%
33871PA0110013	Keystone DPOS Gold Preferred \$40/\$80/\$650	2.3%	2.2%	4.2%	4.1%
33871PA0110014	Keystone DPOS Gold Classic \$1,500/\$30/\$60/90%	2.0%	1.9%	3.9%	3.8%
33871PA0110019	Keystone DPOS Silver Classic \$3,750/\$30/\$60/50%	3.2%	3.1%	5.1%	5.0%
33871PA0110020	Keystone DPOS Bronze Essential \$7,500/\$70/\$140/\$700	2.9%	2.8%	4.8%	4.7%
33871PA0100044	Keystone HMO Gold Proactive	3.9%	3.8%	5.9%	5.8%
33871PA0100045	Keystone HMO Silver Proactive	4.5%	4.4%	6.5%	6.4%
33871PA0100047	Keystone HMO Gold Classic \$2,500/\$40/\$80/100%	2.1%	1.9%	3.9%	3.8%
33871PA0100048	Keystone HMO Silver Classic \$4,500/\$50/\$100/100%	3.2%	3.1%	5.1%	5.0%
33871PA0100049	Keystone HMO Silver Secure \$5,000/\$50/\$100/\$600	-3.0%	-3.1%	-1.2%	-1.3%
33871PA0100050	Keystone HMO Platinum Preferred \$30/\$60/\$400	3.2%	3.1%	5.1%	5.0%
33871PA0100051	Keystone HMO Gold Secure \$1,000/\$40/\$80/\$650	2.2%	2.1%	4.1%	4.0%
33871PA0100052	Keystone HMO Silver Proactive Value	4.5%	4.4%	6.4%	6.3%
33871PA0100053	Keystone HMO Platinum Preferred \$5/\$15/\$500	New	New	New	New

GENERAL OVERVIEW

PURPOSES

This Actuarial Memorandum is provided along with the Unified Rate Review Template (URRT) to provide certain information to support the gross premium for the single risk pool for small group market health care insurance underwritten by Keystone Health Plan East in the Commonwealth of Pennsylvania. It is provided as a component of an application for certification as a Qualified Health Plan and a state rate filing. This submission may not be appropriate for other purposes.

GENERAL INFORMATION

COMPANY IDENTIFYING INFORMATION

Company Legal Name: Keystone Health Plan East ("KHPE")

State: Pennsylvania

HIOS Issuer ID (5-digit): 33871

Market: Small Group

Effective Date(s): 1/1/2022 – 3/31/2022, 4/1/2022 – 6/30/2022, 7/1/2022 – 9/30/2022,
10/1/2022 – 12/31/2022

Worksheet 1 of the accompanying URRT contains experience period data and development of the projected Single Risk Pool Gross Premium Average Rate PMPM for the small group market for KHPE. Worksheet 2 contains experience period data and projections by product for the single risk pool for the same entities.

COMPANY CONTACT INFORMATION

Primary Contact Name:

Primary Contact Telephone Number:

Primary Contact Email Address:

PROPOSED RATE INCREASE

The changes to the single risk pool gross premium average rate per member per month (PMPM) from calendar year 2020 to calendar year 2022 were incorporated into the pricing and reflected in the Unified Rate Review Template. The changes are driven by factors including: changes in market-wide population risk morbidity and covered services, increasing unit costs for medical services, increasing utilization of medical services, increasing fees and taxes imposed by the federal government, anticipated costs to administer the plan, and anticipated revenue or payments due to market-wide risk adjustment.

The Federal government ended the Health Insurance Providers Fee beginning with premiums due in 2021.

We are projecting that claims will increase by 8.4% in 2022. More than half of the change in health care service costs is driven by changes to health care provider fees.

Some plan benefits are mandated by federal and state law. Benefit changes for some plans were also made. All changes in benefits are in compliance with the uniform modifications rules stipulated by the Federal government.

The weighted average increase across KHPE plans based on projected membership, inclusive of the impact of benefit and cost sharing changes, is 3.4%. The minimum increase is -3.0% and the maximum increase is 4.5%.

WORKSHEET 1: MARKET EXPERIENCE

SECTION I: EXPERIENCE PERIOD DATA

SINGLE RISK POOL

The single risk pool reflects all covered lives for every small group non-grandfathered product and plan combination for KHPE in the state of Pennsylvania. It is established according to the Single Risk Pool requirements in 45 CFR § 156.80(d).

PAID THROUGH DATE

Experience period premium, claims, and member months are obtained from the company's internal data warehouse. The claims data is collected for incurred dates from January through December 2020 and paid through February 2021. Earned premiums and member months are for January through December 2020. The data are for all direct-written small group business of KHPE in the Commonwealth of Pennsylvania.

PREMIUMS IN EXPERIENCE PERIOD

Earned Premiums in the Experience Period are developed by summing the earned premium reported in the company's internal data warehouse.

ALLOWED AND INCURRED CLAIMS INCURRED DURING THE EXPERIENCE PERIOD

Paid-to-Date and Incurred Claims, and Member Months

Insurer fee-for-service claims expenses and member liabilities for dates of service in January 2020 through December 2020 and paid through February 2021 are sourced from the IBCFOC's internal data

warehouse. The claims and member liabilities are completed with incurred but not reported (IBNR) adjustments to develop ultimate incurred insurer fee-for-service claims expenses and member liabilities for the January through December 2020 period. Capitation amounts are also sourced from the internal data warehouse for the January through December 2020 period but they are not adjusted for IBNR.

Allowed Claims

Allowed claims are determined by separately obtaining paid-to-date fee-for-service claims and member cost-sharing amounts, applying claim lag factors to those amounts to estimate ultimate incurred fee-for-service claims and member-sharing amounts and adding them together with capitation amounts.

Allowed claims do not include ineligible claims, payments for services other than medical care provided, recovery payments related to internal large claim pooling mechanisms, or active live reserves.

IBNR Development

Medical fee for service incurred but not reported (IBNR) claims are modeled through the use of standard claim lag methodologies. A range of results is developed, and a provision for adverse deviation is applied. The provision for adverse deviation is dependent on many factors such as stability, size, product mix, etc.

The completion factors are developed annually in the 2Q – 3Q period. We do not believe our IBNR is unusually high or unusually low for incurred 2020 paid through February 2021.

Experience Period Index Rate

The Index Rate of Experience Period is estimated by removing cost and utilization trend from the Index Rate for Projection Period.

SECTION II: PROJECTIONS

BENEFIT CATEGORIES

Experience Period Index Rate PMPM Data is provided in Section II. The data is provided by benefit category using a standardized indicator from the internal data warehouse that assigns each claim line to a category based on the type of provider and the location of the service.

PROJECTION FACTORS

The estimated incurred claims experience on an allowed basis for January 2020 through December 2020 is projected to the future rating period by several factors.

Morbidity Adjustment

Experience period allowed claims are adjusted to account for differences in the average morbidity of the single risk pool population underlying the experience and the anticipated population in the projection period. This adjustment reflects changes in the small group market-wide morbidity.

COVID-19 Impact

Demographic Shift

This factor reflects the projected change in the average age, rating area, and tobacco utilization of the single risk pool.

Plan Design Changes

This factor reflects any changes in EHB allowed claims due to plan design changes.

Other Changes

This factor reflects changes in cost related to items other than changes in Morbidity, Demographic Shift, or Plan Design.

Trend Factors

a. Annualized Cost Trend

Annual cost trend reflects changes in costs of medical treatment due to medical inflation and changes in the distribution of services across network providers. The trend value is developed by reviewing historical medical costs for the single risk pool and adjusting them for anticipated future provider contracting reimbursement levels. The data is normalized for changes in age, benefit changes during the experience period, changes to provider contracts, and prescription drug formulary, and new drugs brought to market.

b. Annualized Utilization Trend

Annual utilization trend reflects the change in the number of units per 1,000 members for a fixed level of illness burden and includes changes due to the mix and intensity of services provided and changes related to shifts in product mix. It also includes effects of selection, if any, since this cannot be reflected in the relative cost of the various products and plans offered.

c. Quarterly Premium Trend

Rates for second, third and fourth quarters increase by 1.5% each quarter

CREDIBILITY MANUAL RATE DEVELOPMENT

We combined the experience period data for KHPE with the experience period data for QCC Insurance Company (“QCC”). This should provide a more stable basis for projecting the Index Rate. The combined data is shown in Tab 1b. The Change in Network Factor is intended to result in KHPE rates that are reasonable in relation to QCC rates. The combined claims are determined to be 100% credible as reflected in Table 5.

RISK ADJUSTMENT AND REINSURANCE

Projected Risk Adjustment PMPM

Projected Risk Adjustment is accounted for in Projected Incurred Claims before Risk Adjustment to reflect anticipated risk adjustment transfer amounts for the projection period. The amount reflects the projected morbidity for the single risk pool in the projection period.

The estimated risk adjustment revenue for all of the plans in the risk pool is developed using the following methodology. We recognize that the HHS payment transfer formula implies that the projected incurred claims based solely on the experience period single risk pool claims need to be adjusted by the ratio of the current statewide market’s risk relative to allowable rating factor (ARF) for age compared to the single risk pool’s risk relative to ARF presented during the experience period. This adjustment, together with the assumed future changes in population risk morbidity, results in the issuer’s pricing being consistent with the anticipated morbidity level of the future statewide market.

The anticipated risk adjustment transfer revenue is allocated proportionally based on plan premium. The Projected Risk Adjustment is subtracted from Projected Incurred Claims before ACA Risk Adjustment to reflect anticipated receipt of risk adjustment transfer amounts for the projection period.

The projected risk adjustment amounts for KHPE and Independence Blue Cross (QCC) are consistent with the projection made in the respective submissions. We also considered preliminary 2020 risk transfer results.

MARKET ADJUSTED INDEX RATE

The template calculates a MAIR by subtracting the amounts entered for reinsurance and risk adjustment and dividing by 1 minus the exchange user fee percentage. The MAIR calculation flows into Worksheet 2.

The Market Adjusted Index rate is calculated as the Index Rate adjusted for all allowable market-wide modifiers defined in the market rating rules: federal reinsurance program adjustment, risk adjustment

and exchange user fees. The Market Adjusted Index Rate reflects the average demographic characteristics of the single risk pool.

WORKSHEET 2: PRODUCT-PLAN DATA COLLECTION

SECTION I: GENERAL PRODUCT AND PLAN INFORMATION

All products and plans included in the single risk pool are shown in Worksheet 2.

AV METAL VALUES

The AV Metal Values included in Worksheet 2 of the URRT were valued using the AV Calculator, where possible, otherwise the AV Metal Values were developed under an alternate methodology. Actuarial certifications required by 45 CFR Part 156, §156.135 are provided in a separate document.

SECTION II: EXPERIENCE PERIOD AND CURRENT PLAN LEVEL INFORMATION

Experience Period data is shown for each plan included in the single risk pool.

SECTION III: PLAN ADJUSTMENT FACTORS

The MAIR is adjusted for each plan based on its plan design, provider network, and non-EHBs. Administrative costs are added to calculate the Plan Adjusted Index Rate. The Plan Adjusted Index Rate is multiplied by the Age Calibration Factor, Geographic Calibration Factor, and Tobacco Calibration Factor to calculate the Calibrated Plan Adjusted Index Rate.

PLAN ADJUSTED INDEX RATE

The Plan Adjusted Index Rate is calculated as the issuer Market Adjusted Index Rate adjusted for all allowable plan level modifiers defined in the market rating rule. These include actuarial value and cost sharing adjustment, provider network, delivery system and utilization management adjustment, adjustment for benefits in addition to the EHBs, impact of specific eligibility categories for the catastrophic plan and administrative costs.

NON-BENEFIT EXPENSES AND PROFIT & RISK

Administrative Expense Load

An Administrative Expense Load is applied to Projected Incurred Claims to reflect expenses related to quality improvement and fraud detection/recovery and other expenses of operating a business, broker commissions, and premium payment processing fees.

Profit & Risk Load/Contribution to Surplus

A Profit & Risk Load/Contribution to Surplus for the single risk pool is applied to Projected Incurred Claims for the projection period, if applicable.

Taxes and Fees

A Taxes & Fees load is applied to Projected Incurred Claims to pass through fees and taxes levied by the federal and state governments.

CALIBRATION

The plan adjusted index rate is projected for all products using the same anticipated age distribution and the mandated age curve. Therefore the consumer adjusted premium rate is the plan adjusted index rate divided by the average age, geographic and tobacco factors for the expected distribution. The average age of the combined small group risk pool population is 37.

The Average Age factor is the reciprocal of the weighted average age factor based on the projected membership. The Tobacco Factor is calculated as the reciprocal of the projected average factor for tobacco users multiplied by the projected tobacco use prevalence.

There is only one geographic rating area for this filing. The geographic rating area factor for this filing is 1.0.

Small differences result between the Calibrated Plan Adjusted Index rates and the Age 21 non-tobacco rates in the Rate Template due to rounding restrictions required in the URRT Part 1.

When rounded to the nearest dollar, the Calibrated Plan Adjusted Index Rates match the Age 21 non-tobacco rates in the Rate Template as required in the DIT.

MEMBERSHIP PROJECTIONS

Enrollment is projected based on current and anticipated enrollment by plan. Items impacting these projections include changes in the size of the market due to guarantee issue requirements and the individual mandate changes. The enrollment is our February 2021 enrollment.

LOSS RATIO

The loss ratio calculated in Section IV is generated within the template and is not based on the MLR formula. The projected loss ratio for the single risk pool is estimated to exceed 80% reflecting premium adjustments permitted by the federal MLR calculation.

INDEX RATE

The Index Rate is defined as the EHB portion of projected allowed claims divided by all projected single risk pool lives. The Index Rate is the same value for all non-grandfathered plans for KHPE Small Group Plans in Pennsylvania. The Index Rate reflects the twelve month projection for calendar year 2022. It has been developed following the specifications of 45 CFR § 156.80(d)(1).

TERMINATED PLANS

No plans are being terminated during 2022.

WORKSHEET 3: RATING AREAS

There are nine rating areas in Pennsylvania. These plans are offered only in Rating Area 8, which consists of Bucks, Chester, Delaware, Montgomery, and Philadelphia counties.

ACTUARIAL CERTIFICATION

I, [REDACTED], am Director & Actuary of Commercial Markets for the Independence Blue Cross Family of Companies. I am a member of the Society of Actuaries and the American Academy of Actuaries in good standing with the education and experience necessary to perform the work necessary and meet the Qualification Standards of the American Academy of Actuaries to render the qualified actuarial opinion contained herein. The developed rates and memorandum have been prepared in conformity with appropriate Actuarial Standards of Practice and the Academy's Code of Professional Conduct.

The Part I Unified Rate Review Template does not demonstrate the process used by the issuer to develop the premium rates and allowable rating factors. Rather, it represents information required by Federal regulation to be provided in support of the review of rate increases, for certification of Qualified Health Plans for Federally-facilitated Exchanges, and for certification that the Index Rate is developed in accordance with federal regulation and used consistently and only adjusted by the allowable modifiers.

I hereby certify that, to the best of my knowledge and judgment, the following:

- The projected index rate is:
 - In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.80 and 147.102);
 - Developed in compliance with applicable Actuarial Standards of Practice;
 - Reasonable in relation to the benefits provided and the population anticipated to be covered; and
 - Neither excessive nor deficient.
- The index rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan level rates.
- Geographic rating factors reflect only differences in the costs of delivery of and do not include differences for population morbidity by geographic area.

- The AV Calculator was used to determine the AV Metal Values shown in Worksheet 2 of the Part I Unified Rate Review Template for all plans, unless an alternate methodology was required. When an alternate methodology was used to calculate the AV Metal Value a copy of the actuarial certification required by 45 CFR Part 156, §156.135 was included.

May 18, 2021

Project Overview									
Project Name		Project ID		Project Manager		Project Status		Project Budget	
Project Details									
Project Name		Project ID		Project Manager		Project Status		Project Budget	
Project A		P001		John Doe		On Track		\$1,000,000	
Project B		P002		Jane Smith		Delayed		\$2,500,000	
Project C		P003		Mike Johnson		On Track		\$500,000	
Project D		P004		Sarah Brown		On Track		\$750,000	
Project E		P005		David White		On Track		\$1,200,000	
Project F		P006		Emily Green		On Track		\$900,000	
Project G		P007		Chris Black		On Track		\$1,100,000	
Project H		P008		Alex Blue		On Track		\$800,000	
Project I		P009		Nina Pink		On Track		\$600,000	
Project J		P010		Liam Purple		On Track		\$1,300,000	
Project K		P011		Olivia Yellow		On Track		\$700,000	
Project L		P012		Noah Grey		On Track		\$950,000	
Project M		P013		Sophia Silver		On Track		\$1,050,000	
Project N		P014		Ethan Gold		On Track		\$850,000	
Project O		P015		Ava Bronze		On Track		\$1,150,000	
Project P		P016		Lucas Copper		On Track		\$980,000	
Project Q		P017		Mia Iron		On Track		\$1,080,000	
Project R		P018		Ben Steel		On Track		\$1,180,000	
Project S		P019		Charlotte Tin		On Track		\$1,280,000	
Project T		P020		Daniel Lead		On Track		\$1,380,000	
Project U		P021		Grace Zinc		On Track		\$1,480,000	
Project V		P022		Henry Nickel		On Track		\$1,580,000	
Project W		P023		Isabella Cobalt		On Track		\$1,680,000	
Project X		P024		Jack Manganese		On Track		\$1,780,000	
Project Y		P025		Kia Vanadium		On Track		\$1,880,000	
Project Z		P026		Leo Chromium		On Track		\$1,980,000	
Project AA		P027		Mia Molybdenum		On Track		\$2,080,000	
Project AB		P028		Noah Niobium		On Track		\$2,180,000	
Project AC		P029		Olivia Tantalum		On Track		\$2,280,000	
Project AD		P030		Percy Zirconium		On Track		\$2,380,000	
Project AE		P031		Quinn Hafnium		On Track		\$2,480,000	
Project AF		P032		Sam Rhenium		On Track		\$2,580,000	
Project AG		P033		Tina Ruthenium		On Track		\$2,680,000	
Project AH		P034		Uma Rhodium		On Track		\$2,780,000	
Project AI		P035		Victor Palladium		On Track		\$2,880,000	
Project AJ		P036		Wendy Silver		On Track		\$2,980,000	
Project AK		P037		Xavier Gold		On Track		\$3,080,000	
Project AL		P038		Yara Copper		On Track		\$3,180,000	
Project AM		P039		Zoe Iron		On Track		\$3,280,000	
Project AN		P040		Adam Steel		On Track		\$3,380,000	
Project AO		P041		Bella Tin		On Track		\$3,480,000	
Project AP		P042		Caleb Lead		On Track		\$3,580,000	
Project AQ		P043		Diana Zinc		On Track		\$3,680,000	
Project AR		P044		Ethan Nickel		On Track		\$3,780,000	
Project AS		P045		Fiona Cobalt		On Track		\$3,880,000	
Project AT		P046		Gavin Manganese		On Track		\$3,980,000	
Project AU		P047		Hannah Vanadium		On Track		\$4,080,000	
Project AV		P048		Ivan Chromium		On Track		\$4,180,000	
Project AW		P049		Julia Molybdenum		On Track		\$4,280,000	
Project AX		P050		Karl Niobium		On Track		\$4,380,000	
Project AY		P051		Liam Tantalum		On Track		\$4,480,000	
Project AZ		P052		Mia Zirconium		On Track		\$4,580,000	
Project BA		P053		Noah Hafnium		On Track		\$4,680,000	
Project BB		P054		Olivia Rhenium		On Track		\$4,780,000	
Project BC		P055		Percy Ruthenium		On Track		\$4,880,000	
Project BD		P056		Quinn Rhodium		On Track		\$4,980,000	
Project BE		P057		Sam Palladium		On Track		\$5,080,000	
Project BF		P058		Tina Silver		On Track		\$5,180,000	
Project BG		P059		Uma Gold		On Track		\$5,280,000	
Project BH		P060		Victor Copper		On Track		\$5,380,000	
Project BI		P061		Wendy Iron		On Track		\$5,480,000	
Project BJ		P062		Xavier Steel		On Track		\$5,580,000	
Project BK		P063		Yara Tin		On Track		\$5,680,000	
Project BL		P064		Zoe Lead		On Track		\$5,780,000	
Project BM		P065		Adam Zinc		On Track		\$5,880,000	
Project BN		P066		Bella Nickel		On Track		\$5,980,000	
Project BO		P067		Caleb Cobalt		On Track		\$6,080,000	
Project BP		P068		Diana Manganese		On Track		\$6,180,000	
Project BQ		P069		Ethan Vanadium		On Track		\$6,280,000	
Project BR		P070		Fiona Chromium		On Track		\$6,380,000	
Project BS		P071		Gavin Molybdenum		On Track		\$6,480,000	
Project BT		P072		Hannah Niobium		On Track		\$6,580,000	
Project BU		P073		Ivan Tantalum		On Track		\$6,680,000	
Project BV		P074		Julia Zirconium		On Track		\$6,780,000	
Project BW		P075		Karl Hafnium		On Track		\$6,880,000	
Project BX		P076		Liam Rhenium		On Track		\$6,980,000	
Project BY		P077		Mia Ruthenium		On Track		\$7,080,000	
Project BZ		P078		Noah Rhodium		On Track		\$7,180,000	
Project CA		P079		Olivia Palladium		On Track		\$7,280,000	
Project CB		P080		Percy Silver		On Track		\$7,380,000	
Project CC		P081		Quinn Gold		On Track		\$7,480,000	
Project CD		P082		Sam Copper		On Track		\$7,580,000	
Project CE		P083		Tina Iron		On Track		\$7,680,000	
Project CF		P084		Uma Steel		On Track		\$7,780,000	
Project CG		P085		Victor Tin		On Track		\$7,880,000	
Project CH		P086		Wendy Lead		On Track		\$7,980,000	
Project CI		P087		Xavier Zinc		On Track		\$8,080,000	
Project CJ		P088		Yara Nickel		On Track		\$8,180,000	
Project CK		P089		Zoe Cobalt		On Track		\$8,280,000	
Project CL		P090		Adam Manganese		On Track		\$8,380,000	
Project CM		P091		Bella Vanadium		On Track		\$8,480,000	
Project CN		P092		Caleb Chromium		On Track		\$8,580,000	
Project CO		P093		Diana Molybdenum		On Track		\$8,680,000	
Project CP		P094		Ethan Niobium		On Track		\$8,780,000	
Project CQ		P095		Fiona Tantalum		On Track		\$8,880,000	
Project CR		P096		Gavin Zirconium		On Track		\$8,980,000	
Project CS		P097		Hannah Hafnium		On Track		\$9,080,000	
Project CT		P098		Ivan Rhenium		On Track		\$9,180,000	
Project CU		P099		Julia Ruthenium		On Track		\$9,280,000	
Project CV		P100		Karl Rhodium		On Track		\$9,380,000	
Project CW		P101		Liam Palladium		On Track		\$9,480,000	
Project CX		P102		Mia Silver		On Track		\$9,580,000	
Project CY		P103		Noah Gold		On Track		\$9,680,000	
Project CZ		P104		Olivia Copper		On Track		\$9,780,000	
Project DA		P105		Percy Iron		On Track		\$9,880,000	
Project DB		P106		Quinn Steel		On Track		\$9,980,000	
Project DC		P107		Sam Tin		On Track		\$10,080,000	
Project DD		P108		Tina Lead		On Track		\$10,180,000	
Project DE		P109		Uma Zinc		On Track		\$10,280,000	
Project DF		P110		Victor Nickel		On Track		\$10,380,000	
Project DG		P111		Wendy Cobalt		On Track		\$10,480,000	
Project DH		P112		Xavier Manganese		On Track		\$10,580,000	
Project DI		P113		Yara Vanadium		On Track		\$10,680,000	
Project DJ		P114		Zoe Chromium		On Track		\$10,780,000	
Project DK		P115		Adam Molybdenum		On Track		\$10,880,000	
Project DL		P116		Bella Niobium		On Track		\$10,980,000	
Project DM		P117		Caleb Tantalum		On Track		\$11,080,000	
Project DN		P118		Diana Zirconium		On Track		\$11,180,000	
Project DO		P119		Ethan Hafnium		On Track		\$11,280,000	
Project DP		P120		Fiona Rhenium		On Track		\$11,380,000	
Project DQ		P121		Gavin Ruthenium		On Track		\$11,480,000	
Project DR		P122		Hannah Rhodium		On Track		\$11,580,000	
Project DS		P123		Ivan Palladium		On Track		\$11,680,000	
Project DT		P124		Julia Silver		On Track		\$11,780,000	
Project DU		P125		Karl Gold		On Track		\$11,880,000	
Project DV		P126		Liam Copper		On Track		\$11,980,000	
Project DW		P127		Mia Iron		On Track		\$12,080,000	
Project DX		P128		Noah Steel		On Track		\$12,180,000	
Project DY		P129		Olivia Tin		On Track		\$12,280,000	
Project DZ		P130		Percy Lead		On Track		\$12,380,000	
Project EA		P131		Quinn Zinc		On Track		\$12,480,000	
Project EB		P132		Sam Nickel		On Track		\$12,580,000	
Project EC		P133		Tina Cobalt		On Track		\$12,680,000	
Project ED		P134		Uma Manganese		On Track		\$12,780,000	
Project EE		P135		Victor Vanadium		On Track		\$12,880,000	
Project EF		P136		Wendy Chromium		On Track		\$12,980,000	
Project EG		P137		Xavier Molybdenum		On Track		\$13,080,000	
Project EH		P138		Yara Niobium		On Track		\$13,180,000	
Project EI		P139		Zoe Tantalum		On Track		\$13,280,000	
Project EJ		P140		Adam Zirconium		On Track		\$13,380,000	
Project EK		P141		Bella Hafnium		On Track		\$13,480,000	
Project EL		P142		Caleb Rhenium		On Track		\$13,580,000	
Project EM		P143		Diana Ruthenium		On Track		\$13,680,000	
Project EN		P144		Ethan Rhodium		On Track		\$13,780,000	
Project EO		P145		Fiona Palladium		On Track		\$13,880,000	
Project EP		P146		Gavin Silver		On Track		\$13,980,000	
Project EQ		P147		Hannah Gold		On Track		\$14,080,000	
Project ER		P148		Ivan Copper		On Track		\$14,180,000	
Project ES		P149		Julia Iron		On Track		\$14,280,000	
Project ET		P150		Karl Steel		On Track		\$14,380,000	
Project EU		P151		Liam Tin		On Track		\$14,480,000	
Project EV		P152		Mia Lead		On Track		\$14,580,000	
Project EW		P153		Noah Zinc		On Track		\$14,680,000	
Project EX		P154		Olivia Nickel		On Track		\$14,780,000	
Project EY		P155		Percy Cobalt		On Track		\$14,880,000	
Project EZ		P156		Quinn Manganese		On Track		\$14,980,000	
Project FA		P157		Sam Vanadium		On Track		\$15,080,000	
Project FB		P158		Tina Chromium		On Track		\$15,180,000	
Project FC		P159		Uma Molybdenum		On Track		\$15,280,000	
Project FD		P160		Victor Niobium		On Track		\$15,380,000	
Project FE		P161		Wendy Tantalum		On Track		\$15,480,000	
Project FF		P162		Xavier Zirconium		On Track		\$15,580,000	
Project FG		P163		Yara Hafnium		On Track		\$15,680,000	
Project FH		P164		Zoe Rhenium		On Track		\$15,780,000	
Project FI		P165		Adam Ruthenium		On Track		\$15,880,000	
Project FJ		P166		Bella Rhodium		On Track		\$15,980,000	
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Project FL		P168		Diana Silver		On Track		\$16,180,000	
Project FM		P169		Ethan Gold		On Track		\$16,280,000	
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Project FO		P171		Gavin Iron		On Track		\$16,480,000	
Project FP		P172		Hannah Steel		On Track		\$16,580,000	
Project FQ		P173		Ivan Tin		On Track		\$16,680,000	
Project FR		P174		Julia Lead		On Track		\$16,780,000	
Project FS		P175		Karl Zinc		On Track		\$16,880,000	
Project FT		P176		Liam Nickel		On Track		\$16,980,000	
Project FU		P177		Mia Cobalt		On Track		\$17,080,000	
Project FV		P178		Noah Manganese		On Track		\$17,180,000	
Project FW		P179		Olivia Vanadium		On Track		\$17,280,000	
Project FX		P180		Percy Chromium		On Track		\$17,380,000	
Project FY		P181		Quinn Molybdenum		On Track		\$17,480,000	
Project FZ		P182		Sam Niobium		On Track		\$17,580,000	
Project GA		P183		Tina Tantalum		On Track		\$17,680,000	
Project GB		P184		Uma Zirconium		On Track		\$17,780,000	
Project GC		P185		Victor Hafnium		On Track		\$17,880,000	
Project GD		P186		Wendy Rhenium		On Track		\$17,980,000	
Project GE		P187		Xavier Ruthenium		On Track		\$18,080,000	
Project GF		P188		Yara Rhodium		On Track			

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Project Overview									
Project Name		Project Manager			Project Status		Project Budget		
Project ID		Project Lead			Project Phase		Project Cost		
Project Name		Project Manager			Project Status		Project Budget		
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Project B		Project Manager B			Project Status B		Project Budget B		
Project C		Project Manager C			Project Status C		Project Budget C		
Project D		Project Manager D			Project Status D		Project Budget D		
Project E		Project Manager E			Project Status E		Project Budget E		
Project F		Project Manager F			Project Status F		Project Budget F		
Project G		Project Manager G			Project Status G		Project Budget G		
Project H		Project Manager H			Project Status H		Project Budget H		
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Project J		Project Manager J			Project Status J		Project Budget J		
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Project U		Project Manager U			Project Status U		Project Budget U		
Project V		Project Manager V			Project Status V		Project Budget V		
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Project HM		Project Manager HM			Project Status HM		Project Budget HM		
Project HN		Project Manager HN			Project Status HN		Project Budget HN		
Project HO		Project Manager HO			Project Status HO		Project Budget HO		
Project HP		Project Manager HP			Project Status HP		Project Budget HP		
Project HQ		Project Manager HQ			Project Status HQ		Project Budget HQ		
Project HR		Project Manager HR			Project Status HR		Project Budget HR		
Project HS		Project Manager HS			Project Status HS		Project Budget HS		
Project HT		Project Manager HT			Project Status HT		Project Budget HT		
Project HU		Project Manager HU			Project Status HU		Project Budget HU		
Project HV		Project Manager HV			Project Status HV		Project Budget HV		
Project HW		Project Manager HW			Project Status HW		Project Budget HW		
Project HX		Project Manager HX			Project Status HX		Project Budget HX		
Project HY		Project Manager HY			Project Status HY		Project Budget HY		
Project HZ		Project Manager HZ			Project Status HZ		Project Budget HZ		
Project IA		Project Manager IA			Project Status IA		Project Budget IA		
Project IB		Project Manager IB			Project Status IB		Project Budget IB		
Project IC		Project Manager IC			Project Status IC		Project Budget IC		
Project ID		Project Manager ID			Project Status ID		Project Budget ID		
Project IE		Project Manager IE			Project Status IE		Project Budget IE		
Project IF		Project Manager IF			Project Status IF		Project Budget IF		
Project IG		Project Manager IG			Project Status IG		Project Budget IG		
Project IH		Project Manager IH			Project Status IH		Project Budget IH		
Project II		Project Manager II			Project Status II		Project Budget II		
Project IJ		Project Manager IJ			Project Status IJ		Project Budget IJ		
Project IK		Project Manager IK			Project Status IK		Project Budget IK		
Project IL		Project Manager IL			Project Status IL		Project Budget IL		
Project IM		Project Manager IM			Project Status IM		Project Budget IM		
Project IN		Project Manager IN			Project Status IN		Project Budget IN		
Project IO		Project Manager IO			Project Status IO		Project Budget IO		
Project IP		Project Manager IP			Project Status IP		Project Budget IP		
Project IQ		Project Manager IQ			Project Status IQ		Project Budget IQ		
Project IR		Project Manager IR			Project Status IR		Project Budget IR		
Project IS		Project Manager IS			Project Status IS		Project Budget IS		
Project IT		Project Manager IT			Project Status IT		Project Budget IT		
Project IU		Project Manager IU			Project Status IU		Project Budget IU		
Project IV		Project Manager IV			Project Status IV		Project Budget IV		
Project IW		Project Manager IW			Project Status IW		Project Budget IW		
Project IX		Project Manager IX			Project Status IX		Project Budget IX		
Project IY		Project Manager IY			Project Status IY				

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Global Financial Performance Report - Q3 2024									
Company		Revenue		Profit		Market		Growth	
Entity	Region	Q3	YTD	Q3	YTD	Val	Cap	YoY	QoQ
Alpha Corp	North America	1200000	3600000	250000	750000	150000000	100000000	12.5%	3.2%
	Europe	800000	2400000	180000	540000	100000000	70000000	8.7%	2.1%
	Asia Pacific	950000	2850000	220000	660000	120000000	85000000	15.1%	4.5%
	Latin America	300000	900000	60000	180000	40000000	25000000	5.3%	1.8%
	Africa	150000	450000	30000	90000	20000000	12000000	2.9%	0.9%
	Oceania	200000	600000	40000	120000	25000000	15000000	3.8%	1.2%
	Global Total	3750000	11250000	780000	2340000	535000000	337000000	9.6%	2.5%
	Market Share	23.4%							
	Competitor A	18.2%							
	Competitor B	14.1%							
Beta Inc	North America	900000	2700000	180000	540000	110000000	75000000	10.1%	2.8%
	Europe	600000	1800000	120000	360000	80000000	55000000	7.4%	1.9%
	Asia Pacific	750000	2250000	150000	450000	95000000	65000000	11.8%	3.1%
	Latin America	250000	750000	50000	150000	30000000	18000000	4.2%	1.5%
	Africa	100000	300000	20000	60000	12000000	7000000	1.8%	0.6%
	Oceania	150000	450000	30000	90000	18000000	10000000	2.5%	0.8%
	Global Total	2700000	8100000	540000	1350000	345000000	220000000	7.8%	2.0%
	Market Share	18.9%							
	Competitor A	14.5%							
	Competitor B	11.2%							
Gamma Ltd	North America	1100000	3300000	220000	660000	130000000	90000000	13.2%	3.5%
	Europe	700000	2100000	140000	420000	90000000	60000000	9.5%	2.3%
	Asia Pacific	850000	2550000	170000	510000	110000000	75000000	14.7%	4.2%
	Latin America	350000	1050000	70000	210000	45000000	28000000	6.1%	2.0%
	Africa	180000	540000	36000	108000	22000000	13000000	3.1%	1.0%
	Oceania	220000	660000	44000	132000	28000000	16000000	4.0%	1.3%
	Global Total	3300000	9900000	660000	1980000	425000000	282000000	11.2%	2.7%
	Market Share	21.5%							
	Competitor A	19.8%							
	Competitor B	15.7%							
Delta Co	North America	1050000	3150000	210000	630000	125000000	85000000	12.8%	3.4%
	Europe	650000	1950000	130000	390000	85000000	58000000	9.2%	2.2%
	Asia Pacific	800000	2400000	160000	480000	105000000	70000000	13.5%	3.8%
	Latin America	300000	900000	60000	180000	38000000	24000000	5.5%	1.7%
	Africa	120000	360000	24000	72000	15000000	9000000	2.2%	0.7%
	Oceania	180000	540000	36000	108000	22000000	13000000	3.3%	1.1%
	Global Total	3000000	9000000	600000	1800000	385000000	259000000	10.5%	2.6%
	Market Share	20.3%							
	Competitor A	18.9%							
	Competitor B	14.8%							
Epsilon Corp	North America	950000	2850000	190000	570000	115000000	78000000	11.5%	3.0%
	Europe	550000	1650000	110000	330000	75000000	50000000	8.1%	2.0%
	Asia Pacific	700000	2100000	140000	420000	90000000	60000000	12.3%	3.3%
	Latin America	280000	840000	56000	168000	35000000	22000000	4.8%	1.6%
	Africa	110000	330000	22000	66000	13000000	8000000	2.0%	0.7%
	Oceania	160000	480000	32000	96000	19000000	11000000	2.7%	0.9%
	Global Total	2650000	7950000	520000	1560000	337000000	221000000	9.3%	2.3%
	Market Share	19.1%							
	Competitor A	17.6%							
	Competitor B	13.9%							
Zeta Inc	North America	1000000	3000000	200000	600000	120000000	80000000	12.0%	3.2%
	Europe	600000	1800000	120000	360000	80000000	55000000	8.5%	2.1%
	Asia Pacific	750000	2250000	150000	450000	100000000	68000000	13.0%	3.6%
	Latin America	320000	960000	64000	192000	40000000	26000000	5.8%	1.8%
	Africa	130000	390000	26000	78000	16000000	10000000	2.3%	0.8%
	Oceania	190000	570000	38000	114000	23000000	14000000	3.5%	1.2%
	Global Total	2870000	8610000	568000	1710000	371000000	243000000	10.0%	2.5%
	Market Share	20.8%							
	Competitor A	19.2%							
	Competitor B	15.1%							
Eta Corp	North America	1150000	3450000	230000	690000	135000000	92000000	13.8%	3.7%
	Europe	750000	2250000	150000	450000	95000000	65000000	10.2%	2.4%
	Asia Pacific	900000	2700000	180000	540000	115000000	78000000	15.5%	4.4%
	Latin America	380000	1140000	76000	228000	48000000	30000000	6.5%	2.2%
	Africa	190000	570000	38000	114000	23000000	14000000	3.4%	1.1%
	Oceania	230000	690000	46000	138000	29000000	17000000	4.3%	1.4%
	Global Total	3500000	10350000	714000	2160000	437000000	296000000	12.5%	3.0%
	Market Share	22.6%							
	Competitor A	20.5%							
	Competitor B	16.3%							
Theta Ltd	North America	1080000	3240000	216000	648000	128000000	86000000	12.6%	3.4%
	Europe	680000	2040000	136000	408000	88000000	59000000	9.0%	2.2%
	Asia Pacific	820000	2460000	164000	492000	108000000	72000000	13.9%	3.9%
	Latin America	340000	1020000	68000	204000	42000000	27000000	5.9%	1.9%
	Africa	140000	420000	28000	84000	17000000	10000000	2.4%	0.9%
	Oceania	200000	600000	40000	120000	24000000	15000000	3.6%	1.3%
	Global Total	3160000	9480000	624000	1908000	399000000	266000000	11.0%	2.8%
	Market Share	21.2%							
	Competitor A	19.5%							
	Competitor B	15.4%							
Iota Corp	North America	1020000	3060000	204000	612000	122000000	81000000	12.2%	3.3%
	Europe	620000	1860000	124000	372000	82000000	56000000	8.8%	2.1%
	Asia Pacific	780000	2340000	156000	468000	102000000	69000000	13.2%	3.7%
	Latin America	310000	930000	62000	186000	39000000	25000000	5.6%	1.7%
	Africa	125000	375000	25000	75000	15500000	9500000	2.1%	0.8%
	Oceania	175000	525000	35000	105000	21500000	13000000	3.2%	1.1%
	Global Total	2905000	8715000	586000	1752000	380000000	253000000	10.7%	2.7%
	Market Share	20.0%							
	Competitor A	18.7%							
	Competitor B	14.6%							
Kappa Inc	North America	1180000	3540000	236000	708000	138000000	93000000	14.1%	3.8%
	Europe	780000	2340000	156000	468000	98000000	67000000	10.5%	2.5%
	Asia Pacific	920000	2760000	184000	552000	118000000	80000000	16.2%	4.6%
	Latin America	400000	1200000	80000	240000	50000000	31000000	6.8%	2.3%
	Africa	200000	600000	40000	120000	24000000	15000000	3.7%	1.2%
	Oceania	240000	720000	48000	144000	30000000	18000000	4.5%	1.5%
	Global Total	3720000	11160000	744000	2232000	458000000	309000000	13.2%	3.2%
	Market Share	23.8%							
	Competitor A	21.0%							
	Competitor B	16.9%							
Lambda Corp	North America	1060000	3180000	212000	636000	126000000	83000000	12.4%	3.4%
	Europe	660000	1980000	132000	396000	86000000	58000000	8.9%	2.2%
	Asia Pacific	840000	2520000	168000	504000	106000000	71000000	13.7%	3.8%
	Latin America	330000	990000	66000	198000	41000000	26000000	5.7%	1.8%
	Africa	135000	405000	27000	81000	16500000	10000000	2.3%	0.9%
	Oceania	195000	585000	39000	117000	23500000	14000000	3.4%	1.2%

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Project Overview									
Project Name		Project Manager			Project Status		Project Budget		
Project ID		Project Lead			Project Phase		Project Cost		
Project Description		Project Manager			Project Status		Project Budget		
Project A		Project Manager A			Project Status A		Project Budget A		
Project B		Project Manager B			Project Status B		Project Budget B		
Project C		Project Manager C			Project Status C		Project Budget C		
Project D		Project Manager D			Project Status D		Project Budget D		
Project E		Project Manager E			Project Status E		Project Budget E		
Project F		Project Manager F			Project Status F		Project Budget F		
Project G		Project Manager G			Project Status G		Project Budget G		
Project H		Project Manager H			Project Status H		Project Budget H		
Project I		Project Manager I			Project Status I		Project Budget I		
Project J		Project Manager J			Project Status J		Project Budget J		
Project K		Project Manager K			Project Status K		Project Budget K		
Project L		Project Manager L			Project Status L		Project Budget L		
Project M		Project Manager M			Project Status M		Project Budget M		
Project N		Project Manager N			Project Status N		Project Budget N		
Project O		Project Manager O			Project Status O		Project Budget O		
Project P		Project Manager P			Project Status P		Project Budget P		
Project Q		Project Manager Q			Project Status Q		Project Budget Q		
Project R		Project Manager R			Project Status R		Project Budget R		
Project S		Project Manager S			Project Status S		Project Budget S		
Project T		Project Manager T			Project Status T		Project Budget T		
Project U		Project Manager U			Project Status U		Project Budget U		
Project V		Project Manager V			Project Status V		Project Budget V		
Project W		Project Manager W			Project Status W		Project Budget W		
Project X		Project Manager X			Project Status X		Project Budget X		
Project Y		Project Manager Y			Project Status Y		Project Budget Y		
Project Z		Project Manager Z			Project Status Z		Project Budget Z		
Project AA		Project Manager AA			Project Status AA		Project Budget AA		
Project AB		Project Manager AB			Project Status AB		Project Budget AB		
Project AC		Project Manager AC			Project Status AC		Project Budget AC		
Project AD		Project Manager AD			Project Status AD		Project Budget AD		
Project AE		Project Manager AE			Project Status AE		Project Budget AE		
Project AF		Project Manager AF			Project Status AF		Project Budget AF		
Project AG		Project Manager AG			Project Status AG		Project Budget AG		
Project AH		Project Manager AH			Project Status AH		Project Budget AH		
Project AI		Project Manager AI			Project Status AI		Project Budget AI		
Project AJ		Project Manager AJ			Project Status AJ		Project Budget AJ		
Project AK		Project Manager AK			Project Status AK		Project Budget AK		
Project AL		Project Manager AL			Project Status AL		Project Budget AL		
Project AM		Project Manager AM			Project Status AM		Project Budget AM		
Project AN		Project Manager AN			Project Status AN		Project Budget AN		
Project AO		Project Manager AO			Project Status AO		Project Budget AO		
Project AP		Project Manager AP			Project Status AP		Project Budget AP		
Project AQ		Project Manager AQ			Project Status AQ		Project Budget AQ		
Project AR		Project Manager AR			Project Status AR		Project Budget AR		
Project AS		Project Manager AS			Project Status AS		Project Budget AS		
Project AT		Project Manager AT			Project Status AT		Project Budget AT		
Project AU		Project Manager AU			Project Status AU		Project Budget AU		
Project AV		Project Manager AV			Project Status AV		Project Budget AV		
Project AW		Project Manager AW			Project Status AW		Project Budget AW		
Project AX		Project Manager AX			Project Status AX		Project Budget AX		
Project AY		Project Manager AY			Project Status AY		Project Budget AY		
Project AZ		Project Manager AZ			Project Status AZ		Project Budget AZ		
Project BA		Project Manager BA			Project Status BA		Project Budget BA		
Project BB		Project Manager BB			Project Status BB		Project Budget BB		
Project BC		Project Manager BC			Project Status BC		Project Budget BC		
Project BD		Project Manager BD			Project Status BD		Project Budget BD		
Project BE		Project Manager BE			Project Status BE		Project Budget BE		
Project BF		Project Manager BF			Project Status BF		Project Budget BF		
Project BG		Project Manager BG			Project Status BG		Project Budget BG		
Project BH		Project Manager BH			Project Status BH		Project Budget BH		
Project BI		Project Manager BI			Project Status BI		Project Budget BI		
Project BJ		Project Manager BJ			Project Status BJ		Project Budget BJ		
Project BK		Project Manager BK			Project Status BK		Project Budget BK		
Project BL		Project Manager BL			Project Status BL		Project Budget BL		
Project BM		Project Manager BM			Project Status BM		Project Budget BM		
Project BN		Project Manager BN			Project Status BN		Project Budget BN		
Project BO		Project Manager BO			Project Status BO		Project Budget BO		
Project BP		Project Manager BP			Project Status BP		Project Budget BP		
Project BQ		Project Manager BQ			Project Status BQ		Project Budget BQ		
Project BR		Project Manager BR			Project Status BR		Project Budget BR		
Project BS		Project Manager BS			Project Status BS		Project Budget BS		
Project BT		Project Manager BT			Project Status BT		Project Budget BT		
Project BU		Project Manager BU			Project Status BU		Project Budget BU		
Project BV		Project Manager BV			Project Status BV		Project Budget BV		
Project BW		Project Manager BW			Project Status BW		Project Budget BW		
Project BX		Project Manager BX			Project Status BX		Project Budget BX		
Project BY		Project Manager BY			Project Status BY		Project Budget BY		
Project BZ		Project Manager BZ			Project Status BZ		Project Budget BZ		
Project CA		Project Manager CA			Project Status CA		Project Budget CA		
Project CB		Project Manager CB			Project Status CB		Project Budget CB		
Project CC		Project Manager CC			Project Status CC		Project Budget CC		
Project CD		Project Manager CD			Project Status CD		Project Budget CD		
Project CE		Project Manager CE			Project Status CE		Project Budget CE		
Project CF		Project Manager CF			Project Status CF		Project Budget CF		
Project CG		Project Manager CG			Project Status CG		Project Budget CG		
Project CH		Project Manager CH			Project Status CH		Project Budget CH		
Project CI		Project Manager CI			Project Status CI		Project Budget CI		
Project CJ		Project Manager CJ			Project Status CJ		Project Budget CJ		
Project CK		Project Manager CK			Project Status CK		Project Budget CK		
Project CL		Project Manager CL			Project Status CL		Project Budget CL		
Project CM		Project Manager CM			Project Status CM		Project Budget CM		
Project CN		Project Manager CN			Project Status CN		Project Budget CN		
Project CO		Project Manager CO			Project Status CO		Project Budget CO		
Project CP		Project Manager CP			Project Status CP		Project Budget CP		
Project CQ		Project Manager CQ			Project Status CQ		Project Budget CQ		
Project CR		Project Manager CR			Project Status CR		Project Budget CR		
Project CS		Project Manager CS			Project Status CS		Project Budget CS		

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Table 1: Summary of Data									
Category		Sub-category		Value		Unit		Description	
ID	Name	Type	Status	Value 1	Value 2	Unit 1	Unit 2	Description 1	Description 2
1	Item 1	Type A	Active	100	200	kg	m	Item 1 Description	Item 1 Detail
2	Item 2	Type B	Inactive	50	100	kg	m	Item 2 Description	Item 2 Detail
3	Item 3	Type A	Active	150	300	kg	m	Item 3 Description	Item 3 Detail
4	Item 4	Type B	Inactive	75	150	kg	m	Item 4 Description	Item 4 Detail
5	Item 5	Type A	Active	120	240	kg	m	Item 5 Description	Item 5 Detail
6	Item 6	Type B	Inactive	60	120	kg	m	Item 6 Description	Item 6 Detail
7	Item 7	Type A	Active	180	360	kg	m	Item 7 Description	Item 7 Detail
8	Item 8	Type B	Inactive	90	180	kg	m	Item 8 Description	Item 8 Detail
9	Item 9	Type A	Active	110	220	kg	m	Item 9 Description	Item 9 Detail
10	Item 10	Type B	Inactive	55	110	kg	m	Item 10 Description	Item 10 Detail
11	Item 11	Type A	Active	130	260	kg	m	Item 11 Description	Item 11 Detail
12	Item 12	Type B	Inactive	65	130	kg	m	Item 12 Description	Item 12 Detail
13	Item 13	Type A	Active	160	320	kg	m	Item 13 Description	Item 13 Detail
14	Item 14	Type B	Inactive	80	160	kg	m	Item 14 Description	Item 14 Detail
15	Item 15	Type A	Active	140	280	kg	m	Item 15 Description	Item 15 Detail
16	Item 16	Type B	Inactive	70	140	kg	m	Item 16 Description	Item 16 Detail
17	Item 17	Type A	Active	190	380	kg	m	Item 17 Description	Item 17 Detail
18	Item 18	Type B	Inactive	95	190	kg	m	Item 18 Description	Item 18 Detail
19	Item 19	Type A	Active	115	230	kg	m	Item 19 Description	Item 19 Detail
20	Item 20	Type B	Inactive	58	116	kg	m	Item 20 Description	Item 20 Detail
21	Item 21	Type A	Active	135	270	kg	m	Item 21 Description	Item 21 Detail
22	Item 22	Type B	Inactive	68	136	kg	m	Item 22 Description	Item 22 Detail
23	Item 23	Type A	Active	170	340	kg	m	Item 23 Description	Item 23 Detail
24	Item 24	Type B	Inactive	85	170	kg	m	Item 24 Description	Item 24 Detail
25	Item 25	Type A	Active	155	310	kg	m	Item 25 Description	Item 25 Detail
26	Item 26	Type B	Inactive	77	154	kg	m	Item 26 Description	Item 26 Detail
27	Item 27	Type A	Active	195	390	kg	m	Item 27 Description	Item 27 Detail
28	Item 28	Type B	Inactive	98	196	kg	m	Item 28 Description	Item 28 Detail
29	Item 29	Type A	Active	125	250	kg	m	Item 29 Description	Item 29 Detail
30	Item 30	Type B	Inactive	62	124	kg	m	Item 30 Description	Item 30 Detail
31	Item 31	Type A	Active	145	290	kg	m	Item 31 Description	Item 31 Detail
32	Item 32	Type B	Inactive	72	144	kg	m	Item 32 Description	Item 32 Detail
33	Item 33	Type A	Active	185	370	kg	m	Item 33 Description	Item 33 Detail
34	Item 34	Type B	Inactive	92	184	kg	m	Item 34 Description	Item 34 Detail
35	Item 35	Type A	Active	165	330	kg	m	Item 35 Description	Item 35 Detail
36	Item 36	Type B	Inactive	82	164	kg	m	Item 36 Description	Item 36 Detail
37	Item 37	Type A	Active	200	400	kg	m	Item 37 Description	Item 37 Detail
38	Item 38	Type B	Inactive	100	200	kg	m	Item 38 Description	Item 38 Detail
39	Item 39	Type A	Active	130	260	kg	m	Item 39 Description	Item 39 Detail
40	Item 40	Type B	Inactive	65	130	kg	m	Item 40 Description	Item 40 Detail
41	Item 41	Type A	Active	175	350	kg	m	Item 41 Description	Item 41 Detail
42	Item 42	Type B	Inactive	88	176	kg	m	Item 42 Description	Item 42 Detail
43	Item 43	Type A	Active	160	320	kg	m	Item 43 Description	Item 43 Detail
44	Item 44	Type B	Inactive	80	160	kg	m	Item 44 Description	Item 44 Detail
45	Item 45	Type A	Active	190	380	kg	m	Item 45 Description	Item 45 Detail
46	Item 46	Type B	Inactive	95	190	kg	m	Item 46 Description	Item 46 Detail
47	Item 47	Type A	Active	120	240	kg	m	Item 47 Description	Item 47 Detail
48	Item 48	Type B	Inactive	60	120	kg	m	Item 48 Description	Item 48 Detail
49	Item 49	Type A	Active	140	280	kg	m	Item 49 Description	Item 49 Detail
50	Item 50	Type B	Inactive	70	140	kg	m	Item 50 Description	Item 50 Detail
51	Item 51	Type A	Active	180	360	kg	m	Item 51 Description	Item 51 Detail
52	Item 52	Type B	Inactive	90	180	kg	m	Item 52 Description	Item 52 Detail
53	Item 53	Type A	Active	110	220	kg	m	Item 53 Description	Item 53 Detail
54	Item 54	Type B	Inactive	55	110	kg	m	Item 54 Description	Item 54 Detail
55	Item 55	Type A	Active	135	270	kg	m	Item 55 Description	Item 55 Detail
56	Item 56	Type B	Inactive	68	136	kg	m	Item 56 Description	Item 56 Detail
57	Item 57	Type A	Active	170	340	kg	m	Item 57 Description	Item 57 Detail
58	Item 58	Type B	Inactive	85	170	kg	m	Item 58 Description	Item 58 Detail
59	Item 59	Type A	Active	155	310	kg	m	Item 59 Description	Item 59 Detail
60	Item 60	Type B	Inactive	77	154	kg	m	Item 60 Description	Item 60 Detail
61	Item 61	Type A	Active	195	390	kg	m	Item 61 Description	Item 61 Detail
62	Item 62	Type B	Inactive	98	196	kg	m	Item 62 Description	Item 62 Detail
63	Item 63	Type A	Active	125	250	kg	m	Item 63 Description	Item 63 Detail
64	Item 64	Type B	Inactive	62	124	kg	m	Item 64 Description	Item 64 Detail
65	Item 65	Type A	Active	145	290	kg	m	Item 65 Description	Item 65 Detail
66	Item 66	Type B	Inactive	72	144	kg	m	Item 66 Description	Item 66 Detail
67	Item 67	Type A	Active	185	370	kg	m	Item 67 Description	Item 67 Detail
68	Item 68	Type B	Inactive	92	184	kg	m	Item 68 Description	Item 68 Detail
69	Item 69	Type A	Active	165	330	kg	m	Item 69 Description	Item 69 Detail
70	Item 70	Type B	Inactive	82	164	kg	m	Item 70 Description	Item 70 Detail
71	Item 71	Type A	Active	200	400	kg	m	Item 71 Description	Item 71 Detail
72	Item 72	Type B	Inactive	100	200	kg	m	Item 72 Description	Item 72 Detail
73	Item 73	Type A	Active	130	260	kg	m	Item 73 Description	Item 73 Detail
74	Item 74	Type B	Inactive	65	130	kg	m	Item 74 Description	Item 74 Detail
75	Item 75	Type A	Active	175	350	kg	m	Item 75 Description	Item 75 Detail
76	Item 76	Type B	Inactive	88	176	kg	m	Item 76 Description	Item 76 Detail
77	Item 77	Type A	Active	160	320	kg	m	Item 77 Description	Item 77 Detail
78	Item 78	Type B	Inactive	80	160	kg	m	Item 78 Description	Item 78 Detail
79	Item 79	Type A	Active	190	380	kg	m	Item 79 Description	Item 79 Detail
80	Item 80	Type B	Inactive	95	190	kg	m	Item 80 Description	Item 80 Detail
81	Item 81	Type A	Active	120	240	kg	m	Item 81 Description	Item 81 Detail
82	Item 82	Type B	Inactive	60	120	kg	m	Item 82 Description	Item 82 Detail
83	Item 83	Type A	Active	140	280	kg	m	Item 83 Description	Item 83 Detail
84	Item 84	Type B	Inactive	70	140	kg	m	Item 84 Description	Item 84 Detail
85	Item 85	Type A	Active	180	360	kg	m	Item 85 Description	Item 85 Detail
86	Item 86	Type B	Inactive	90	180	kg	m	Item 86 Description	Item 86 Detail
87	Item 87	Type A	Active	110	220	kg	m	Item 87 Description	Item 87 Detail
88	Item 88	Type B	Inactive	55	110	kg	m	Item 88 Description	Item 88 Detail
89	Item 89	Type A	Active	135	270	kg	m	Item 89 Description	Item 89 Detail
90	Item 90	Type B	Inactive	68	136	kg	m	Item 90 Description	Item 90 Detail
91	Item 91	Type A	Active	170	340	kg	m	Item 91 Description	Item 91 Detail
92	Item 92	Type B	Inactive	85	170	kg	m	Item 92 Description	Item 92 Detail
93	Item 93	Type A	Active	155	310	kg	m	Item 93 Description	Item 93 Detail
94	Item 94	Type B	Inactive	77	154	kg	m	Item 94 Description	Item 94 Detail
95	Item 95	Type A	Active	195	390	kg	m	Item 95 Description	Item 95 Detail
96	Item 96	Type B	Inactive	98	196	kg	m	Item 96 Description	Item 96 Detail
97	Item 97	Type A	Active	125	250	kg	m	Item 97 Description	Item 97 Detail
98	Item 98	Type B	Inactive	62	124	kg	m	Item 98 Description	Item 98 Detail
99	Item 99	Type A	Active	145	290	kg	m	Item 99 Description	Item 99 Detail
100	Item 100	Type B	Inactive	72	144	kg	m	Item 100 Description	Item 100 Detail

[illegible]

Cover Page

HIOS Issuer ID: 33871

HIOS Product ID: 33871PA010, 33871PA011

This single PDF file contains three separate actuarial certifications for the unique plan designs under Issuer ID 33871. Please refer to all of the pages contained herein.

Unique Plan Design Supporting Documentation and Justification

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 33871

HIOS Product IDs: 33871PA010, 33871PA011

Applicable HIOS Plan IDs (Standard Component): 33871PA0100023, 33871PA0110014, 33871PA0100047, 33871PA0100024, 33871PA0100048

Purpose of document:

The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning 1/1/2022. As prescribed by law, the AV calculation was based on the AV calculator to the full extent possible. The AV is meant to represent the average percent of costs paid by the insurer for a standard population and may vary from actual member experience. The resulting AV was based on prescribed methodology and, therefore, may not reasonably reflect the actuary's estimate of the portion of allowed costs covered by the health insurance plan. The AV was determined based on the plan's benefits and coverage data, the standard population, and utilization and continuance tables published by HHS for purposes of the valuation of AV. This actuarial analysis is not appropriate for any other purposes.

Reasons the plan design is unique (benefits that are not compatible with the parameters of the AV calculator and the materiality of those benefits):

The cost-sharing for outpatient facility fee varies by site of service. Outpatient facility fee accounts for roughly 12% of allowed costs in the AV calculation.

The cost sharing of primary care for these plans is a combination of copays for office visits in person and virtual care. Primary care services account for about 3% of allowed costs in the AV calculation.

The cost sharing of specialist care for these plans is a combination of copays for office visits in person and virtual care. Specialist services account for about 4% of allowed costs in the AV calculation.

Acceptable alternate method used per 156.135(b)(2) or 156.135(b)(3):

Method 156.135(b)(2) was used for the outpatient facility site of service cost-sharing and the copays of primary care and specialist physicians.

Confirmation that only in-network cost-sharing, including multitier networks, was considered:

I confirm that only in-network cost-sharing was considered.

Description of the standardized plan population data used:

For the freestanding and hospital utilization data for outpatient facility, we used our commercial PPO and HMO data incurred between July 2019 and June 2020.

However, due to COVID-19's disruption on utilization patterns and with the 2022 AV calculator being unchanged from the 2021 AV calculator, we have decided to use last year's assumptions.

For primary care and specialist utilization, we used our commercial PPO and HMO data incurred between January 2020 and December 2020.

If the method described in 156.135(b)(2) was used, a description of how the benefits were modified to fit the parameters of the AV calculator:

Outpatient Facility Fee Site-of-service Differential

For the outpatient facility site of service cost-sharing, our recent data indicated that 80% of outpatient facility claims came from the hospital setting.

The cost-sharing entered into the AV calculator is a weighted average of the coinsurance at a hospital and the coinsurance at an ambulatory surgery center.

Plans	33871PA0100023, 33871PA0110014	33871PA0100047	33871PA0100024	33871PA0100048
Hospital Coinsurance	60%	70%	50%	70%
ASC Coinsurance	90%	100%	70%	100%
Effective Coinsurance	66.00%	76.00%	54.00%	76.00%

Combination of Copays for Primary Care and Specialist

Primary Care Copay Differential

For primary care, our recent data indicated that 85% of utilization came from office visits in person and 15% from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

HIOS_ID	Cost - sharing		AV Input
	PCP	Virtual PCP	
33871PA0100023, 33871PA0110014	\$30	\$20	\$28.50
33871PA0100047	\$40	\$30	\$38.50
33871PA0100024	\$30	\$20	\$28.50
33871PA0100048	\$50	\$35	\$47.75

Specialist Copay Differential

For specialist visits, our recent data indicated that 90% of utilization came from office visits in person and 10% from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

HIOS_ID	Cost - sharing		AV Input
	SP	Virtual SP	
33871PA0100023, 33871PA0110014	\$60	\$40	\$58.00
33871PA0100047	\$80	\$55	\$77.50
33871PA0100024	\$60	\$40	\$58.00
33871PA0100048	\$100	\$70	\$97.00

If the method described in 156.135(b)(3) was used, a description of the data and method used to develop the adjustments:

Not applicable

Certification Language:

The development of the actuarial value is based on one of the acceptable alternative methods outlined in 156.135(b)(2) or 156.135(b)(3) for those benefits that deviate substantially from the parameters of the AV Calculator and have a material impact on the AV.

The analysis was

- (i) conducted by a member of the American Academy of Actuaries; and
- (ii) performed in accordance with generally accepted actuarial principles and methodologies.

I am an employee of the issuer, I meet the *Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States* promulgated by the American Academy of Actuaries, and I have the education and experience necessary to perform this work. All AVs herein were determined in accordance with the ASOPs established by the Actuarial Standards Board and comply with applicable laws and regulations; furthermore, all metal levels herein were appropriately assigned based on applicable law.

Actuary signature: _____

Actuary Printed Name: _____

Date: _____ 5/14/2021

AV screenshots redacted.

Unique Plan Design Supporting Documentation and Justification

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 33871

HIOS Product IDs: 33871PA010, 33871PA011

Applicable HIOS Plan IDs (Standard Component): 33871PA0100026, 33871PA0110020, 33871PA0100044, 33871PA0100045, 33871PA0100052

Purpose of document:

The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning 1/1/2022. As prescribed by law, the AV calculation was based on the AV calculator to the full extent possible. The AV is meant to represent the average percent of costs paid by the insurer for a standard population and may vary from actual member experience. The resulting AV was based on prescribed methodology and, therefore, may not reasonably reflect the actuary's estimate of the portion of allowed costs covered by the health insurance plan. The AV was determined based on the plan's benefits and coverage data, the standard population, and utilization and continuance tables published by HHS for purposes of the valuation of AV. This actuarial analysis is not appropriate for any other purposes.

Reasons the plan design is unique (benefits that are not compatible with the parameters of the AV calculator and the materiality of those benefits):

The cost-sharing of inpatient hospital services for these plans is a combination of copays for facility claims and coinsurance for professional claims. Inpatient hospital services account for about 21% of allowed costs in the AV calculation.

Plans 33871PA0100044, 33871PA0100045 and 33871PA0100052 have three in-network tiers. 33871PA0100044 has expected third tier utilizations of 37%. 33871PA0100045 and 33871PA0100052 have expected third tier utilizations of 41%.

The cost sharing of primary care for these plans is a combination of copays for office visits in person and virtual care. Primary care services account for about 3% of allowed costs in the AV calculation.

The cost sharing of specialist care for these plans is a combination of copays for office visits in person and virtual care. Specialist services account for about 4% of allowed costs in the AV calculation.

Acceptable alternate method used per 156.135(b)(2) or 156.135(b)(3):

Method 156.135(b)(2) was used for inpatient hospital cost-sharing and the copays of primary care and specialist physicians.

Method 156.135(b)(3) was used to accommodate the three-tier design.

Confirmation that only in-network cost-sharing, including multitier networks, was considered:

I confirm that only in-network cost-sharing was considered.

Description of the standardized plan population data used:

For the freestanding and hospital utilization data for outpatient facility, we used our commercial PPO data incurred between July 2019 and June 2020.

However, due to COVID-19's disruption on utilization patterns and with the 2022 AV calculator being unchanged from the 2021 AV calculator, we have decided to use last year's assumptions.

For primary care and specialist utilization, we used our commercial PPO and HMO data incurred between January 2020 and December 2020.

If the method described in 156.135(b)(2) was used, a description of how the benefits were modified to fit the parameters of the AV calculator:

Combination of Copays and Coinsurance for IP Hospital

The copays for inpatient hospital facility claims were combined with the coinsurance on professional claims to calculate equivalent copays for inpatient claims.

First, we took the allowed PMPY inpatient costs and divided that by the utilization by admit PMPY to calculate the average cost per admit. We also took the utilization by day PMPY and divided that by the utilization by admit PMPY to calculate the average length of stay.

The average cost per admit was divided by the average length of stay to calculate the average cost per day. Based on our data, we assumed that 84% of the cost was from facility claims and the remaining 16% was from professional claims.

The professional coinsurance was multiplied by the professional portion of the daily inpatient cost to calculate equivalent daily copay for that piece. Because there is a 5-day maximum on our plans' inpatient copays, an effective copay factor was calculated by dividing the PMPY cost-sharing from a \$100 per day inpatient copay with a 5-day maximum by the PMPY cost-sharing from a \$100 per day inpatient copay without any maximum. The equivalent daily professional copay amount was then divided by this factor in order to determine the final professional copay reflecting a 5-day maximum.

The final professional copay was then added onto the facility copay to determine the equivalent overall IP hospital copay amount. The exhibit below details this calculation.

HIOS IDs	33871PA0100026, 33871PA0110020	33871PA0100044	33871PA0100044	33871PA0100045, 33871PA0100052	33871PA0100045, 33871PA0100052
IP Cost Sharing					
Facility	\$700	\$700	\$1,100	\$900	\$1,300
Professional	50%	20%	30%	5%	10%
AVC Continuance Table					
	Bronze	Gold	Gold	Silver	Silver
PMPY for IP	\$1,144	\$1,516	\$1,516	\$1,236	\$1,236
Admit PMPY	0.05	0.06	0.06	0.06	0.06
Claim per Admit	\$23,982	\$23,897	\$23,897	\$22,251	\$22,251
Average LOS (days)	4.7	4.6	4.6	4.7	4.7
Effective Copay Factor for 5 days	0.50	0.46	0.46	0.49	0.49
Assumption from Data					
% Facility Cost	84%	84%	84%	84%	84%
% Professional Cost	16%	16%	16%	16%	16%
Calculations					
Professional Claim per Admit	\$3,837	\$3,823	\$3,823	\$3,560	\$3,560
Professional Claim per Day	\$823	\$824	\$824	\$750	\$750
Equiv. Copay per Day no max	\$412	\$165	\$247	\$38	\$75
Equiv. Copay per Day, 5-day max	\$828	\$356	\$534	\$77	\$154
Total Copay per Day, 5-day max	\$1,528	\$1,056	\$1,634	\$977	\$1,454

Combination of Copays for Primary Care and Specialist

Primary Care Copay Differential

For primary care, our recent data indicated that 85% of utilization came from office visits in person and 15% from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

HIOS_ID	Cost - sharing		AV Input
	PCP	Virtual PCP	
Tier 1: 33871PA0100044	\$15	\$10	\$14.25
Tier 2: 33871PA0100044	\$30	\$20	\$28.50
Tier 3: 33871PA0100044	\$45	\$30	\$42.75
Tier 1: 33871PA0100045	\$40	\$30	\$38.50
Tier 2: 33871PA0100045	\$60	\$40	\$57.00
Tier 3: 33871PA0100045	\$70	\$50	\$67.00
Tier 1: 33871PA0100052	\$40	\$30	\$38.50
Tier 2: 33871PA0100052	\$60	\$40	\$57.00
Tier 3: 33871PA0100052	\$70	\$50	\$67.00
33871PA0100026, 33871PA0110020	\$70	\$50	\$67.00

Specialist Copay Differential

For specialist visits, our recent data indicated that 90% of utilization came from office visits in person and 10% from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

HIOS_ID	Cost - sharing		AV Input
	SP	Virtual SP	
Tier 1: 33871PA0100044	\$40	\$30	\$39.00
Tier 2: 33871PA0100044	\$60	\$40	\$58.00
Tier 3: 33871PA0100044	\$80	\$55	\$77.50
Tier 1: 33871PA0100045	\$80	\$55	\$77.50
Tier 2: 33871PA0100045	\$120	\$80	\$116.00
Tier 3: 33871PA0100045	\$140	\$95	\$135.50
Tier 1: 33871PA0100052	\$80	\$55	\$77.50
Tier 2: 33871PA0100052	\$120	\$80	\$116.00
Tier 3: 33871PA0100052	\$140	\$95	\$135.50
33871PA0100026, 33871PA0110020	\$140	\$95	\$135.50

If the method described in 156.135(b)(3) was used, a description of the data and method used to develop the adjustments:

Using the AV calculator and the methods described above, we calculated the AV for each tier in each plan, as follows. Based on actual tier utilization experience incurred between July 2019 and June 2020, we projected expected utilization by tier for the plans. However, due to COVID-19's disruption on utilization patterns and with the 2022 AV calculator being unchanged from the 2021 AV calculator, we have decided to use last year's assumptions. The final AV for the plan was then calculated by taking the weighted average of the tier AVs using the utilization by tier. The following exhibits details this calculation.

Utilization	Tier 1	Tier 2	Tier 3	Total
33871PA0100044	48%	13%	39%	100%
33871PA0100045, 33871PA0100052	50%	9%	41%	100%

HIOS ID	Actuarial Value			
	Tier 1	Tier 2	Tier 3	Average
33871PA0100044	80.55%	77.98%	76.77%	78.74%
33871PA0100045	73.81%	70.27%	69.62%	71.77%
33871PA0100052	72.58%	70.27%	69.62%	71.16%

Certification Language:

The development of the actuarial value is based on one of the acceptable alternative methods outlined in 156.135(b)(2) or 156.135(b)(3) for those benefits that deviate substantially from the parameters of the AV Calculator and have a material impact on the AV.

The analysis was

- (i) conducted by a member of the American Academy of Actuaries; and
- (ii) performed in accordance with generally accepted actuarial principles and methodologies.

I am an employee of the issuer, I meet the *Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States* promulgated by the American Academy of Actuaries, and I have the education and experience necessary to perform this work. All AVs herein were determined in accordance with the ASOPs established by the Actuarial Standards Board and comply with applicable laws and regulations; furthermore, all metal levels herein were appropriately assigned based on applicable law.

Actuary signature: _____

Actuary Printed Name: _____

Date: _____ 5/14/2021

AV screenshots redacted.

Unique Plan Design Supporting Documentation and Justification

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 33871

HIOS Product IDs: 33871PA010, 33871PA011

Applicable HIOS Plan IDs (Standard Component): 33871PA0100020, 33871PA0110011, 33871PA0100021, 33871PA0110012, 33871PA0100050, 33871PA0100053, 33871PA0100022, 33871PA0110013, 33871PA0100051, 33871PA0100049, 33871PA0100025, 33871PA0110019

Purpose of document:

The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning 1/1/2022. As prescribed by law, the AV calculation was based on the AV calculator to the full extent possible. The AV is meant to represent the average percent of costs paid by the insurer for a standard population and may vary from actual member experience. The resulting AV was based on prescribed methodology and, therefore, may not reasonably reflect the actuary's estimate of the portion of allowed costs covered by the health insurance plan. The AV was determined based on the plan's benefits and coverage data, the standard population, and utilization and continuance tables published by HHS for purposes of the evaluation of AV. This actuarial analysis is not appropriate for any other purposes.

Reasons the plan design is unique (benefits that are not compatible with the parameters of the AV calculator and the materiality of those benefits):

The cost sharing of primary care for these plans is a combination of copays for office visits in person and virtual care. Primary care services account for about 3% of allowed costs in the AV calculation.

The cost sharing of specialist care for these plans is a combination of copays for office visits in person and virtual care. Specialist services account for about 4% of allowed costs in the AV calculation.

Acceptable alternate method used per 156.135(b)(2) or 156.135(b)(3):

Method 156.135(b)(2) was used for the copays of primary care and specialist physicians.

Confirmation that only in-network cost sharing, including multitier networks, was considered:

I confirm that only in-network cost sharing was considered.

Description of the standardized plan population data used:

For primary care and specialist utilization, we used our commercial PPO and HMO data incurred between January 2020 and December 2020.

If the method described in 156.135(b)(2) was used, a description of how the benefits were modified to fit the parameters of the AV calculator:

Combination of Copays for Primary Care and Specialist

Primary Care Copay Differential

For primary care, our recent data indicated that 85% of utilization came from office visits in person and 15% from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

HIOS_ID	Cost - sharing		AV Input
	PCP	Virtual PCP	
33871PA0100020, 33871PA0110011	\$10	\$5	\$9.25
33871PA0100021, 33871PA0110012	\$20	\$15	\$19.25
33871PA0100050	\$30	\$20	\$28.50
33871PA0100053	\$5	\$0	\$4.25
33871PA0100022, 33871PA0110013	\$40	\$30	\$38.50
33871PA0100051	\$40	\$30	\$38.50
33871PA0100049	\$50	\$35	\$47.75
33871PA0100025, 33871PA0110019	\$30	\$20	\$28.50

Specialist Copay Differential

For specialist visits, our recent data indicated that 90% of utilization came from office visits in person and 10% from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

HIOS_ID	Cost - sharing		AV Input
	SP	Virtual SP	
33871PA0100020, 33871PA0110011	\$20	\$10	\$19.00
33871PA0100021, 33871PA0110012	\$40	\$25	\$38.50
33871PA0100050	\$60	\$40	\$58.00
33871PA0100053	\$15	\$10	\$14.50
33871PA0100022, 33871PA0110013	\$80	\$55	\$77.50
33871PA0100051	\$80	\$55	\$77.50
33871PA0100049	\$100	\$70	\$97.00
33871PA0100025, 33871PA0110019	\$60	\$40	\$58.00

Certification Language:

The development of the actuarial value is based on one of the acceptable alternative methods outlined in 156.135(b)(2) or 156.135(b)(3) for those benefits that deviate substantially from the parameters of the AV Calculator and have a material impact on the AV.

The analysis was

- (i) conducted by a member of the American Academy of Actuaries; and
- (ii) performed in accordance with generally accepted actuarial principles and methodologies.

I am an employee of the issuer, I meet the *Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States* promulgated by the American Academy of Actuaries, and I have the education and experience necessary to perform this work. All AVs herein were determined in accordance with the ASOPs established by the Actuarial Standards Board and comply with applicable laws and regulations; furthermore, all metal levels herein were appropriately assigned based on applicable law.

Actuary signature: _____

Actuary Printed Name: _____

Date: _____ 5/14/2021 _____

AV screenshots redacted.

A COVID-19 Morbidity Adjustment of 1.052 was used in the rate calculation.

The change in demographics was calculated considering changes to age, geography, and tobacco use.

The change in the average age was measured by comparing the average age factor calculated in this filing, based on February 2021 enrollments, to the average age factor calculated for the prior annual filing.

	2021 Filing	2022 Filing	Change
Age Factor	1.503	1.510	1.004
Geographic Factor	1.000	1.000	1.000
Tobacco Factor	1.006	1.008	1.001
Total change			1.005

No changes were assumed for this filing.

The network factors used in Table 10 are based on the network differentials from the prior filing.

The network factor used for Keystone HMO was 1.100.

The network factor used for Proactive was 1.000.

The factors used in Table 10 recalibrate the values so that the differentials between the factors remains constant, and the composite factor equals 1.000.

Table 10 factors:	HMO	1.048
	Proactive	0.953

REDACTION JUSTIFICATION

DOCUMENT

URRT Part III – Federal Actuarial Memorandum

Redacted Name of opining actuary (page 9)

Redacted COVID-19 Impact (page 4) – confidential and proprietary information

Redacted Company Contact Information (page 1) – name, telephone number, email address

PA Actuarial Memorandum

Redacted Name of opining actuary (pages 7 and 8)

Redacted COVID-19 Impact (page 5) – confidential and proprietary information

Redacted Company Contact Information (page 1) – name, telephone number, email address

Cover Letter

Redacted names and contact information (page 2)

AV Screenshots

Entire File Redacted

Unique AV Justification file

Redacted name of opining actuary (pages 5, 15, and 29)

Redacted AV Screenshots (pages 6-10, 16-26, and 30-41)


2021 and 2022 Service Area


Issuer: Keystone Health Plan East

Market: Small Group



Key (*modify as needed*)

 : On-exchange service area

 : Off-exchange only service area

The following questions were provided by the Department's consulting actuary:

1. The following questions are related to the projected risk adjustment transfer amount:

- a. Please explain and provide the quantitative development of the projected risk adjustment transfer amount PMPM equal to \$22.00.**

The calculation is shown on Tab Q1a of the "KHPE Small Group Response to June 10 Obj" excel worksheet.

- b. Please compare the projected 2022 risk adjustment transfer amount PMPM to the anticipated 2020 risk adjustment transfer amount PMPM, identifying the specific driver(s) of any differences between the two values and providing detailed support for those differences.**

We request that this response be deferred until the updated 2020 risk adjustment is released.

2. The following questions are related to the proposed annual trend rate included in the filing.

- a. Please provide the actual observed trends based on historical allowed claims experience for each benefit category as well as in aggregate for years 2018, 2019, 2020, and 2021 (year to date). We realize 2021 trends will be partially based on estimated claim costs. In providing your response, for each calendar year, provide the total member months, allowed claims, and any normalization adjustments that should be applied to the claims experience. Please provide both raw and COVID-19 adjusted values for 2020 and 2021, as applicable.**

We have added historical trend information in Tab Q2 of the "KHPE Small Group Response to June 10 Obj" excel worksheet.

- b. Please compare the proposed annual trend rate to the actual observed trend rates per your response above. To the extent they are significantly different, please explain and justify why it is reasonable that they should be different.**

Please refer to Tab Q2 of the "KHPE Small Group Response to June 10 Obj" excel worksheet.

- c. Please provide qualitative and quantitative support for the additional 2.8% adjustment to account for higher claims in 2022 related to COVID-related expenses and claims delayed from 2020 and 2021 due to the pandemic. If external studies were utilized to develop the 2.8% assumption, please provide specific references to those studies that were utilized. Further, please clarify whether the additional 2.8% adjustment is on an annual basis (e.g., an additional 2.8% was added to the base annual trend rate) or cumulative (e.g., an additional 1.4% was added to the base annual trend rate).**

The 2.8% is our projected increase from 2021 to 2022 for additional costs related to COVID-19 going forward. These include costs related to care for new variants, further incidence in the unvaccinated population, and the excess costs for care that has been delayed in 2020 and 2021. The 2.8% is not applied to two years' of trend as it reflects increases from 2021 to 2022.

- 3. The filing documents indicate that morbidity was increased by an additional 5.2% to account for the impact of COVID-19 on overall projected claims. Please provide both qualitative and**

quantitative support for this increase, including a numerical development of the adjustment and detailed description of the methodology that was utilized in calculating it.

Please refer to the information in Tab Q3 of the “KHPE Small Group Response to June 10 Obj” excel worksheet. This illustrates the impact compared to normal claim levels in 2020 related to the pandemic. For the year 2020, this was 5.2%. The additional 5.2% applied to morbidity is the return to normal pre-COVID-19 claim levels for 2021.

- 4. Please provide support for and demonstrate the numerical development of the change in network factor as reported on the ‘Rate Development & Change’ tab of the PA Rate Template.**

To be more consistent with our pricing methodology we have created Manual Data by pooling the experience of QCC with KHPE, as our companies are offering coverage to exactly the same populations geographically and customers may choose to enroll in plans from either entity. The pooling results in less difference and volatility in the claim trend rates between QCC and KHPE when kept separate. The network factor includes an adjustment that results in the appropriate rate differential between QCC and KHPE plans.

It is unlikely that this factor will remain constant over time, due to the impact of Risk Adjustment, as well as the mixes of the different provider networks offered by the two entities. A summary of the factors is shown on Tab Q4 of the “KHPE Small Group Response to June 10 Obj” excel worksheet.

- 5. Please provide an explanation and exhibit supporting the numerical development of the projected 2022 MLR that shows compliance with the 80% minimum MLR. Include all components of the numerator and denominator, and indicate how components not already supported were determined.**

The calculation of the MLR is shown on Tab Q5 of the “KHPE Small Group Response to June 10 Obj” excel worksheet.

- 6. As indicated in Item 14 of the Revisions section of the guidance, the Department requests an MLR comparison between the actual and pricing values for the most recent 3 calendar years of complete data (I.e. 2017-2019 for plan year 2022). Section E, Item #3 of the guidance describes the requested information that should be included in the actuarial memorandum. Please provide the requested comparison of the projected vs. actual MLR for each of calendar years 2017, 2018, and 2019.**

Please refer to Tab Q6 of the “KHPE Small Group Response to June 10 Obj” excel worksheet.

The following questions are based on the Department’s review:

- 7. Please confirm that you have tested to ensure that the rates in Table 11 of the PA AM Exhibits, PA Plan Design Summary and Rate Table, Federal Rates Template, and binder are identical.**

We tested the rates in the exhibits and rate tables to assure that they were identical.

- 8. Please provide an exhibit that quantitatively shows a comparison of the actual to projected claim cost PMPMs for calendar years 2017-2020, as applicable.**

Please refer to Tab Q2 of the “KHPE Small Group Response to June 10 Obj” excel worksheet.

- 9. The requested trend for this filing is above the average for all Pennsylvania issuers in this market. Please provide a short list of bullet points that discuss the main causes/drivers of this higher-than-average trend.**

Our trend is based on our projections for 2022 costs and includes both unit cost and utilization assumptions, as it does in other years. However, with calendar year 2020 being the experience period and what trend is applied to, it is not unexpected that there are differences in insurers. Different insurers may have been affected by COVID-19 to different degrees, which affects the 2020 experience period, and their projection for “return to normal” may be different than others’. In addition to the COVID impact differences, the Philadelphia market is significantly more expensive than the PA statewide market and also trends at a different rate.

- 10. As stated in Item 12 of the Revisions section of the guidance, the Department requested a detailed explanation and support for any adjustments to the experience data, and/or projected data due to the impact of COVID. This explanation should be included in the actuarial memorandum. More detail is provided in Section D, Part 2a of the guidance.**

In Section 2.A. of the Actuarial Memorandum, the “COVID-19” impact section discusses our assumptions for the impact on COVID-19, including the additional cost to return to more typical claim levels and the projected impact on claims beginning in 2022. We have also included additional information in Tab Q3 of the “KHPE Small Group Response to June 10 Obj” excel worksheet.

- 11. Please provide the quantitative impact and a narrative description of all significant factors driving the proposed rate increase. As an example, these factors could include:**

- Single risk pool experience which is more adverse than that assumed in the current rates
- Medical inflation
- Increased utilization
- Prospective changes to benefits covered by the product or successor products
- New taxes and fees imposed on the issuer
- Anticipated changes in the average morbidity of the covered population that is market-wide, as opposed to issuer specific morbidity that is reflected in risk adjustment

Please see tab Q11 of the “KHPE Small Group Response to June 10 Obj” excel worksheet.

- 12. Please reconcile the ultimate incurred claims and allowed claims between the rate exhibits and URRT; the difference appears to be the Total Prescription Drug Rebates and Total EHB Capitation amounts shown in cell I36 and J36 of the Data tab of the rate exhibits.**

The amounts reconcile as indicated in this question. Please note that the Allowed Claims in Cell F14 of Section 1 of Worksheet 1 of the URRT Part I are equal to the amount in Cell M37 of Table 2 in Tab I Data of the Actuarial Memorandum Rate Exhibits.

- 13. Please provide an explanation and support for the development of the administrative expense load shown in the actuarial memorandum and Table 6, including general and claims expenses and agent/broker fees and commissions.**

Please see tab Q13 of the “KHPE Small Group Response to Obj Letter June 10” excel worksheet.

14. The administrative expenses assumed in this filing are above average among Pennsylvania issuers in this market. Please provide a short list of bullet points that discuss the main causes/drivers of this higher-than-average expense load.

The costs for operating in the Philadelphia market are higher than costs in the rest of the state. This is reflected in our administrative costs as well.

15. Please provide quantitative development and support of each component of the following adjustments included in Table 5 of the PA Rate Template, for both the experience and manual rate.

- a. Change in Morbidity – All Other
- b. Change in Demographics
- c. Change in Network; indicate the methodology and assumptions used to determine each of the two components of the change in network factor calculation (i.e. a constant for the market and a factor to regulate the relationship between KHPE and QCC).

Please see tab Q15 of the “KHPE Small Group Response to June 10 Obj” excel worksheet.

16. Please provide an explanation for the large differences that are shown for several plans between the Metallic Tier AV (Column H) and the Pricing AV (Column K) in Table 10.

The metal AV is to determine compliance with Actuarial Value and is not a Pricing AV. The metal AV is based on the AV calculator which is calibrated to national average costs. The Philadelphia market is significantly more expensive than the national average from a cost of services standpoint. This means that the same deductible or copay is worth significantly less as a percentage of total allowed cost in the Philadelphia market compared to the national average. This leads to different Pricing AVs for the same metal level.

17. Please provide an exhibit that demonstrates that the criteria for the expanded bronze plans has been met.

Please see tab Q17 of the “KHPE Small Group Response to June 10 Obj” excel worksheet.

18. Per the Pennsylvania Final Rate Filing Guidance, it is anticipated that the profit listed in Table 6 will be an after-tax amount; therefore, the federal income tax percentage of 0.42% shown in Table 6 in cell C57 is understated. Given that the profit of 2% is an after-tax profit, please either update the estimated federal income tax percentage to 0.5316456% if the company wishes to assume an after-tax profit of 2.0%, or revise the after-tax profit to 1.58% if the company wishes to maintain its current federal income tax assumption of 0.42%, and update all exhibits and documents that are impacted by a change in the federal income tax or profit assumption.

We have revised the profit and federal income tax in Tables 6 and 10 to allocate correctly between the two entries. From the combined total of 2.42%, we attributed 0.5082% to federal income tax (21% of the total) and the remaining 1.9118% to profit (79% of the total). The resulting rates are unchanged.

19. Please provide an explanation for the assumed annual trend factor shown in Table 5A, which differs from the trend in Table 3b.

We used a 6.14% annual trend in Table 5A. We feel that a more moderate trend is appropriate for projecting the quarterly rates which will be in force into 2023.

KHPE Small Group

Metal	BMMO	PLRS	ARF	GCF	IDF	AV	Product w Risk	Product w/o Risk	
Plat	166,872	1.632	1.524	0.990	1.150	0.900	1.858	1.561	
Gold	513,636	1.231	1.498	0.990	1.080	0.800	1.315	1.281	
Silver	529,296	0.921	1.513	0.990	1.030	0.700	0.939	1.080	
Bronze	30,012	0.700	1.581	0.990	1.000	0.600	0.693	0.939	
Total	1,239,816	1.139	1.510	0.990	1.066	0.766	1.212	1.225	
Est. StateWide Average		1.244	\$ 459.80	1.506	1.00	1.078	0.786	1.341	1.276

(22.00)

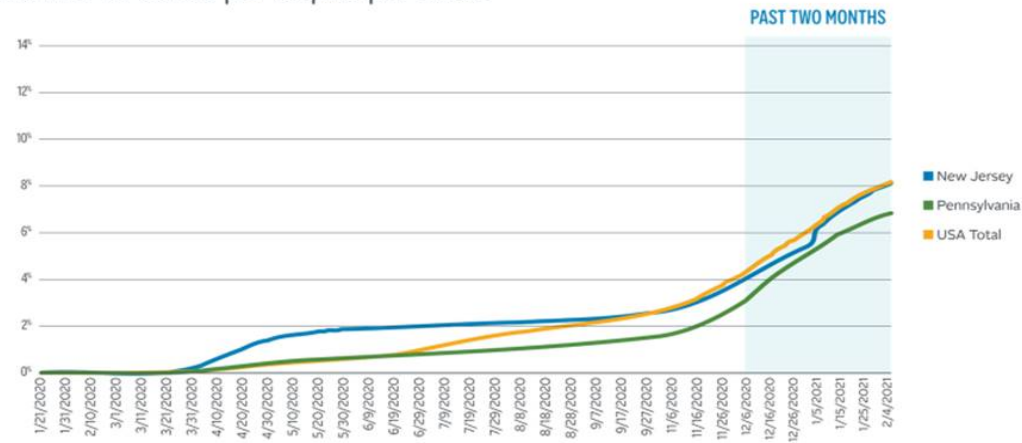
Entity - Unit cost trends (2a)	Segment	2018	2019	2020	2021
CommI KHPE - SG 2-50					
	Inpatient	2.4%	3.1%	4.2%	2.8%
	Outpatient	1.9%	2.8%	3.2%	2.7%
	Professional	1.1%	1.2%	1.5%	2.1%
	Capitation	0.8%	1.8%	1.8%	1.7%
	Total	1.6%	2.2%	2.7%	2.4%

KHPE Small Group - Actual (2b)

Member Months		PMPM Premium	PMPM Allowed Claims	PMPM Incurred Claims	Premium Trend	Allowed Claims Trend	Incurred Claims Trend	MAIR
2017	1,427,509	\$ 482.44	\$ 358.12	\$ 312.17				\$ 503.09
2018	1,333,423	\$ 525.86	\$ 372.16	\$ 322.30	9.00%	3.92%	3.25%	\$ 487.38 -3.12%
2019	1,310,060	\$ 516.20	\$ 379.43	\$ 326.70	-1.84%	1.95%	1.36%	\$ 535.36 9.84% <- Membership differences
2020	1,285,783	\$ 518.30	\$ 362.49	\$ 326.62	0.41%	-4.46%	-0.02%	\$ 524.62 -2.01% <- Membership differences

2020 COVID-19 Directly related claims

COVID-19 Cases per Capita per State



Sources: State and local health agencies

4

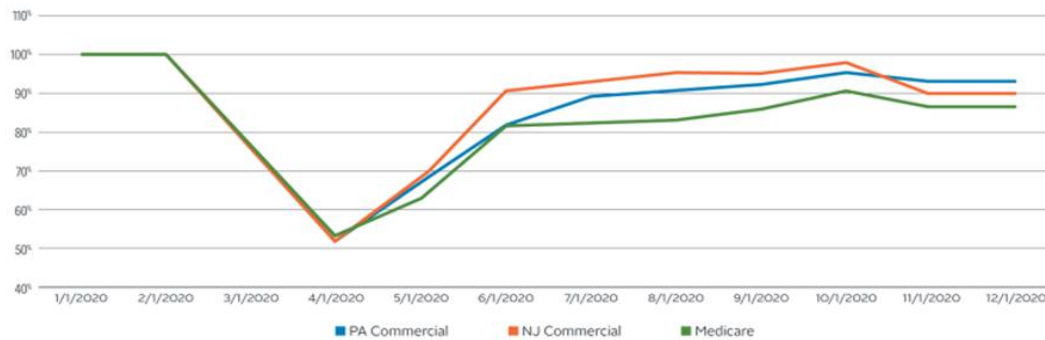
2020 Experience

COVID Adjustment by Month

Jan	0.00%
Feb	0.00%
Mar	-14.60%
April	-25.60%
May	-16.80%
June	-8.50%
July	-6.80%
Aug	-2.50%
Sep	1.10%
Oct	3.10%
Nov	4.00%
Dec	4.10%
	-5.20% <- Total

Avoided and Deferred Care: 2020

% of Normal Paid Claims



5

Data from Tables 5 and 10 of the Actuarial Memo Rate Exhibits

Small Group

	<u>Projected Lives</u>	<u>Age 21 rate</u>	<u>Premium</u>	<u>Network factor</u>	<u>Calibration factor</u>
QCC	72,950	\$ 432.61	\$659.99	1.226	1.526
KHPE	103,319	\$ 375.14	\$570.67	0.961	1.521
Composite Factor				1.0806	

$$\text{Federal MLR} = \frac{(\text{Projected Claims, after Risk Adjustment} + \text{Quality Improvement Expense} - \text{Risk Adj Prog User Fee})}{(\text{Premium, before Risk Adjustment} - \text{HCR Taxes \& Fees} - \text{Federal Income Tax} - \text{Premium Tax})}$$

	KHPE Small Group
Projected Claims PMPM (After Reinsurance)	\$ 468.85
Premium PMPM	\$ 570.67
Quality Improvement Expense PMPM	\$ 4.57
Exchange User Fee PMPM	\$ -
HIF PMPM	\$ -
Federal Income Tax PMPM	\$ 2.90
Premium Tax PMPM	\$ -
Federal MLR	83.4%

Calendar Year	MLR		Member Months		
	Actual	Pricing	Actual	Pricing	
2017	76.4%	88.5%	1,427,509	1,507,680	
2018	75.2%	83.3%	1,333,423	1,434,900	<- Membership losses in certain plans raised MLR by less than expected
2019	75.1%	81.6%	1,310,060	1,507,680	<- Membership losses in certain plans raised MLR by less than expected

KHPE Small Group

	Change
Cost Trend	1.96%
Utilization Trend	6.20%
Benefit Changes	-0.39%
Taxes & Fees	0.09%
COVID - 2022 impact	2.80%
Actual vs. Expected	-7.29%
Rate Change	3.37%

Administrative Expenses		15.34%
General and Claims	9.57%	
Agent/Broker Fees and Commissions	4.97%	
Quality Improvement Initiatives	0.80%	
Taxes and Fees		0.59%
RA User Fee	0.05%	
PCORI Fee	0.04%	
PA Premium Tax	0.00%	
Federal Income Tax	0.51%	
Health Insurance Providers Fee	0.00%	
Profit/Contingency		1.91%
Total Retention		17.84%

Change in Morbidity		Change in Demographic			Change in Network
COVID-19 Impact	Change in Morbidity	2020 Avg Age Factor	2020 Avg Age Factor	Change in Demographic	Unnormalized Weighted Avg Network Factor
1.052	1.052	1.496	1.510	1.009	0.998

These plans satisfy the requirements by offering HSAs:

	<u>HIOS IDs</u>	<u>Plan Marketing Name</u>	<u>FDC Primary Care Services</u>	<u>FDC Specialist Visit</u>
Small Group	33871PA0100026	Keystone HMO Bronze Essential \$7,500/\$70/\$140/\$700	X	X
	33871PA0110020	Keystone DPOS Bronze Essential \$7,500/\$70/\$140/\$700	X	X

The following questions were provided by the Department's consulting actuary:

1. The 'Q1a' tab of the file "KHPE Small Group Response to June 10 Obj.xlsx" provides a numerical development of the projected 2022 risk adjustment transfer PMPM.
 - a. Please provide this same exhibit for the calculation of the 2020 risk adjustment transfer PMPM.
 - b. Please identify and support any significant differences in the components of the risk adjustment calculation between 2020 and 2022 on an issuer and/or statewide basis.

Please see Tab Q1 of the "KHPE Small Group Response to July 6 Obj" excel worksheet.

2. The 'Q2' tab of the file "KHPE Small Group Response to June 10 Obj.xlsx" provides historical trend information. However, it is unclear how the pricing trends utilized in this filing are consistent with the historical trend information included in this exhibit. Please provide additional support demonstrating how the pricing trends utilized in this filing are consistent with the historical trend information included in the 'Q2' tab. If they are not consistent, please explain and justify why it is reasonable that they are not.

We have reviewed our trends. We are comfortable with the 8.40% trend used in this filing.

3. The response to Question 2c of the first round of objections provides a qualitative description of the 2.8% COVID adjustment applied to trend. Please provide additional numerical support for this assumption. Based on the response provided, it is unclear how it was determined that a 2.8% adjustment is a reasonable assumption to reflect future costs of care related to new variants, further incidence in the unvaccinated population, and the excess costs for care that has been delayed in 2020 and 2021.

In consultation with our clinical and Informatics areas, our trend area modeled 4 possible scenarios based on 3 possible severity levels to determine the 2.8%.

The scenarios were

- 1) New variants emerge at a high rate that sends us back into stay-at-home orders "new variant" scenario
- 2) Unvaccinated spread leads to high rates of COVID-hospitalization
- 3) Vaccines are effective and widespread and excess care returns quickly as things open back up ("Herd Immunity and Excess Return of Care" scenario)
- 4) Vaccines are effective and widespread but excess care returns slowly as things open back up ("Herd Immunity and Excess Return of Care w/Shifts" scenario)

We then selected what we thought was likely. We went with Scenario 3 at high severity. A graphic illustration is included in Tab Q3 of the "KHPE Small Group Response to July 6 Obj" excel worksheet.

4. The 'Q4' tab of the file "KHPE Small Group Response to June 10 Obj.xlsx" provides the network factors for QCC and KHPE but does not provide specific support for these factors. Please provide numerical support for the 1.226 network factor for QCC and the 0.961 network factor for KHPE. In providing your response, please also include a detailed description outlining how the estimated network factors were developed.

To be more consistent with our pricing methodology we have created Manual Data by pooling the experience of QCC with KHPE, as our companies are offering coverage to exactly the same

Cover Letter for Responses to July 6 Objection Letter – KHPE Small Group INAC-132818409
Response Date July 13, 2021

populations geographically and customers may choose to enroll in plans from either entity. The pooling results in less difference and volatility in the claim trend rates between QCC and KHPE when kept separate. The network factor includes an adjustment that results in the appropriate rate differential between QCC and KHPE plans.

It is unlikely that this factor will remain constant over time, due to the impact of Risk Adjustment, as well as the mixes of the different provider networks offered by the two entities.

5. **The ‘Q6’ tab of the file “KHPE Small Group Response to June 10 Obj.xlsx” provides the actual and pricing MLRs for 2017 through 2019. In each year, the actual MLR is significantly lower than the pricing MLR. Please demonstrate how these results were taken into consideration in the development of the proposed rates to ensure that the actual MLR will align more closely with the pricing MLR in CY 2022.**

We start with the claims and premium for 2020 in the URRT and that is the basis for the starting point of our pricing. So any historic MLR favorability is adjusted for in the starting premium and claims.

The following items are the result of the Department’s review of the company’s Round 1 responses:

6. **Please provide an exhibit showing the actual experience for calendar years 2016-2020 and the projection experience for 2021 and 2022 for the following categories: Member Months, Total Administrative Expenses, Total Incurred Claims, Total Premium, Total Actual Paid Taxes and Fees, Profit, Total Underwriting Gain/Loss and Underwriting Gain/Loss PMPM.**

We do not have this data readily available at the level that is being requested, therefore we are unable to provide a response to this question. We also view this data as proprietary, and since the filing responses are made public, we think it would be inappropriate to provide this information if it were readily available.

7. **Does this company have any transitional membership? If so, has there recently been a significant drop in transitional membership? Do you anticipate a drop in 2022?**

We do not have any transitional membership. We therefore do not anticipate any change in 2022 since we have no transitional membership.

8. **Please update the 2020 experience period risk adjustment amount, in Table 2, to reflect the final CMS risk adjustment amount released on June 30th.**

We have made this update.

9. **If the projected risk adjustment transfer amount in Table 5 will be modified due to the final CMS transfer amount published on June 30th, please provide narrative and detailed supporting data to justify the proposed changes.**

The published June 30 risk adjusted transfer amount is extremely similar to our earlier projection. Therefore, we are not updating the projected amount in Table 5.

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Response Date July 13, 2021

10. Please confirm that you have tested to ensure that the rates in Table 11 of the Actuarial Memorandum Exhibits, PA Plan Design Summary and Rate Tables, and Federal Rate Templates submitted with your round 2 responses are identical.

We tested the rates in the exhibits and rate tables to assure that they were identical.

11. Please ensure that the 7/13/21 versions of the following items are posted in SERFF with your July 13th response to this data call.

- a. **Cover Letter identifying all changes made and the reasons for the change. Also, show the revised rate change.** – This letter, no rate changes.
- b. **PA Actuarial Memorandum** – No changes
- c. **PA Actuarial Memorandum Exhibits** – Update included
- d. **Department’s Plan Design Summary and Rate Template Exhibits (please ensure that the rate template by county is populated with only numeric values – do not enter “NA” in cells for which there is no rate).** – No changes
- e. **URRT** – Update included
- f. **Federal Rate Template** – No changes
- g. **Part III: Actuarial Memorandum** – No changes
- h. **Updated Rate Change Request Summary (Attachment I)** – No changes
- i. **Public PDF with limited redactions as previously directed in the Guidance (includes all correspondence and supporting exhibits after the initial submission, in addition to all the above items).** – Update included

The updated components are included with this response.

12. As requested in Item 8 of the Round 1 data request, please provide an exhibit that quantitatively shows a comparison of the actual to projected claim cost PMPMs for calendar years 2017-2020. This chart should include columns for the year, actual claim costs, previously projected claim costs, and the percentage differential between the actual and projected costs.

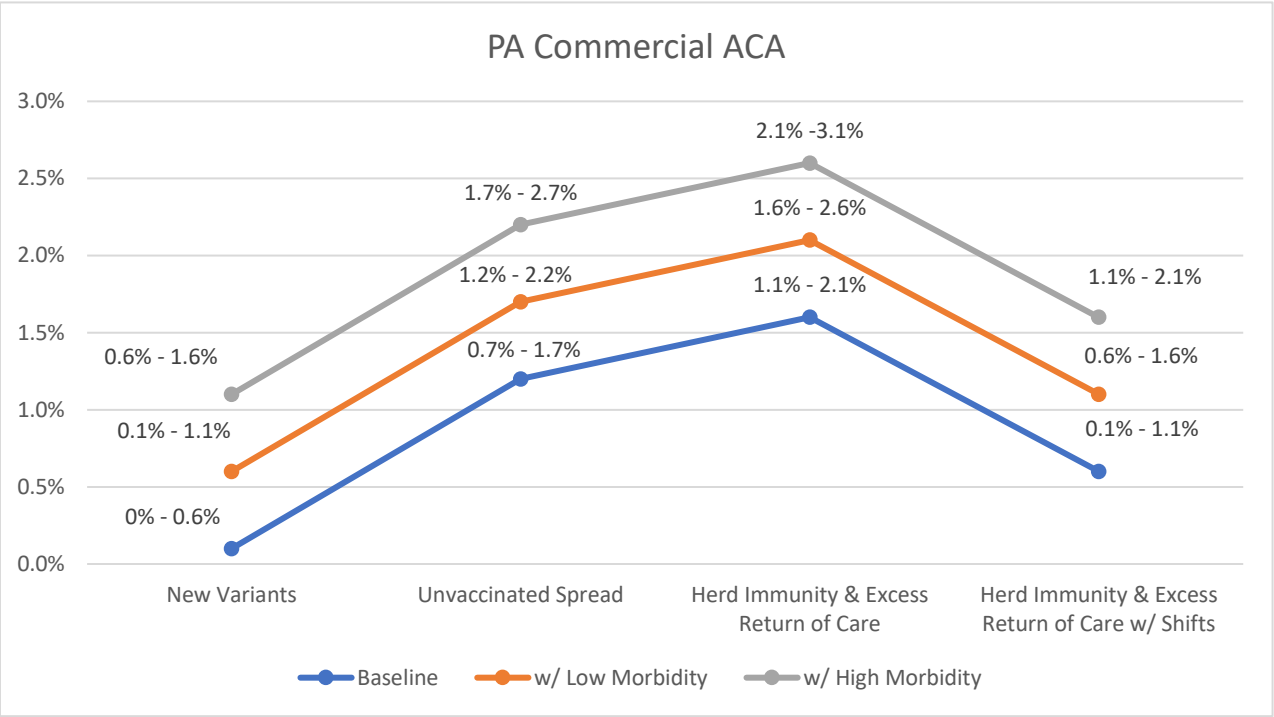
Please see tab Q12 of the “KHPE Small Group Response to July 6 Obj” excel worksheet.

13. Regarding your response to Question 14, please provide further support for the assumption that the administrative expense percentage is higher in Philadelphia than in areas of the state, given the cost differences in various areas.

We are researching this issue with our FP&A area. We will follow up with a response once it is available.

KHPE Small Group

Metal	BMMO	PLRS	ARF	GCF	IDF	AV	Product w Risk	Product w/o Risk	
Plat	183,705	1.673	1.524	0.996	1.150	0.900	1.916	1.571	
Gold	540,396	1.265	1.498	0.996	1.080	0.800	1.361	1.290	
Silver	526,681	0.928	1.513	0.996	1.030	0.700	0.953	1.087	
Bronze	31,099	0.680	1.581	0.996	1.000	0.600	0.678	0.945	
Total	1,281,881	1.171	1.510	0.996	1.068	0.768	1.256	1.238	
Est. StateWide Average		1.244	\$ 445.54	1.506	1.00	1.078	0.786	1.341	1.275



KHPE Small Group

	Member Months		PMPM	PMPM	PMPM	Premium	Allowed	Incurred	Trend	Allowed	Incurred	MAIR
			Premium	Allowed	Incurred		Claims	Claims		Claims	Claims	
	2017	1,427,509	\$ 482.44	\$ 358.12	\$ 312.17							503.09
	2018	1,333,423	\$ 525.86	\$ 372.16	\$ 322.30	9.00%	3.92%	3.25%				487.38 -3.12%
	2019	1,310,060	\$ 516.20	\$ 379.43	\$ 326.70	-1.84%	1.95%	1.36%				535.36 9.84% <- Membership differences
	2020	1,285,783	\$ 518.30	\$ 362.49	\$ 326.62	0.41%	-4.46%	-0.02%				524.62 -2.01% <- Membership differences

Federal MLR =

(Projected Claims, after Risk Adjustment + Quality Improvement Expense - Risk Adj Prog User Fee)

(Premium, before Risk Adjustment - HCR Taxes & Fees - Federal Income Tax - Premium Tax)

	KHPE Small Group	
Projected Claims PMPM (After Reinsurance)	\$	468.85
Premium PMPM	\$	570.67
Quality Improvement Expense PMPM	\$	4.57
Exchange User Fee PMPM	\$	-
HIF PMPM	\$	-
Federal Income Tax PMPM	\$	2.90
Premium Tax PMPM	\$	-
Federal MLR		83.4%

The following questions were provided by the Department's consulting actuary:

- 1. The response to Question 2 of the July 13th responses indicates that the pricing trend has been revised to 8.40%. However, it is still unclear how this pricing trend is consistent with the historical trend information provided in the 'Q2' tab of the file "KHPE Consumer Response to June 10 Obj.xlsx." This historical trend information would suggest a trend more in line with 2.9%, calculated as the average annual allowed claims trend from 2017-2019. Please provide additional support demonstrating why the 8.40% trend is reasonable and why the company is comfortable with this assumption, given that information provided suggests that a significantly lower trend assumption would be more consistent with historical trend levels.**

We have provided additional trend information in Tab Q1 of the "KHPE Small Group Response to July 16 Obj" excel worksheet. This information does not include the impact of COVID. Our projected trends are more in line with the actual experience than the 2.9% mentioned above.

The following item is the result of the Department's review:

- 2. Please revise the Attachment 1 and Public pdf exhibits so that the percentages shown in the "How it plans to spend your premium" are consistent with the figures shown in the filing, particularly Table 6 of the PAAME.**

We have revised the exhibits and included them with this response.

Historical & Projected Unit Cost

		2018	2019	2020	2021	2022
KHPE	Small Group	1.6%	2.2%	2.7%	2.4%	2.9%

Historical & Projected Utilization

		2019	2020	2021	2022
	Small Group	3.1%	4.1%	4.5%	3.0%

The Emerging Rx category includes new drugs including Lumevoq, which treats a rare eye condition (Leber hereditary optic neuropathy), estimated to cost \$750,000 per dose. Also included is Roctavian, for treatment of Hemophilia A, estimated to cost \$3,000,000 per dose.

Combined

		2019	2020	2021	2022
KHPE	Small Group	5.4%	6.9%	7.0%	6.0%

8.40% <== from AM Exhibit (Manual)

	<u>2021</u>	<u>2022</u>	<u>Annualize</u>
Unit	2.4%	3.4%	1.9% <-Fix small group unit cost trends
Utilization	4.5%	3.0%	2.4%
Cap		-11.3%	-1.3%
Rx			1.8%
2022 Covid			2.8%
Total			7.9%
AM exhibit			8.4% <--Unit cost trend are lower than when we did pricing as mentioned on the call
Variance			0.5%

Completeness and Redaction Justification Checklist

Issuer Name: Keystone Health Plan East
 Market: Small Group HMO
 SERFF ID: INAC-132818409

TOC #	Description	Completed (Mark with "X")	Redaction Justification		
			Redacted (Y/N)	Page # in Public PDF	Justification submitted (Y/NA)
Federal Documents Required to Be Filed with PID					
A.2.	RFJ Part I - Unified Rate Review Template	X			
	RFJ Part II – Consumer Friendly Justification	X			
	RFJ Part III – Actuarial Memorandum	X	Y	39-47	Y
	Federal Rates Template	X			
Summary Documents/Confirmation of HIOS & SERFF Submissions					
A.2.B.	HIOS Submission	X			
A.2.C.	SERFF Submission	X			
A.2.D.	SERFF Rate/Rule Schedule Tab	X			
B.	Cover Letter & PA Bulletin Information	X			
C.	Rate Change Request Summary	X			
PA Actuarial Memorandum and Rate Exhibits					
D.1.A.	Company Information	X	Y	7	Y
D.1.B.	Rate History & Proposed Variation in Rate Changes	X	N	8	N/A
D.1.C.	Average Rate Change	X	N	8	N/A
D.1.D.	Membership Count	X	N	8	N/A
	<i>PA Act. Exhibits Table 1</i>	X	N	16	N/A
D.1.E.	Benefit Changes	X	N	8-9	N/A
D.1.F.	Experience Period Claims & Premium	X	N	9-10	N/A
	<i>PA Act. Exhibits Table 2</i>	X	N	16	N/A
D.1.G.	Credibility of Data	X	N	10	N/A
	<i>PA Act. Exhibits Tables 2b, 3b, 4b (if applicable)</i>	X	N	17	N/A
D.1.H.	Trend Identification	X	N	10	N/A
	<i>PA Act. Exhibits Table 3</i>	X	N	16	N/A
D.1.I.	Historical Experience	X	N	10-11	N/A
	<i>PA Act. Exhibits Table 4</i>	X	N	16	N/A
D.2.A.	Development of PAIR, MAIR and Total Allowed Claims	X	N	11-12	N/A
	<i>PA Act. Exhibits Table 5</i>	X	N	18	N/A
D.2.B.	Retention Items	X	N	12-13	N/A
	<i>PA Act. Exhibits Table 6</i>	X	N	18	N/A
D.2.C.	Normalized Market-Adjusted Projected Allowed Total Claims	X	N	13	N/A
	<i>PA Act. Exhibits Table 7</i>	X	N	18	N/A
D.2.D.	Components of Rate Change	X	N	13	N/A
	<i>PA Act. Exhibits Table 8</i>	X	N	18	N/A
	<i>PA Act. Exhibits Table 9</i>	X	N	18	N/A
D.3.	Plan Rate Development	X	N	13	N/A
	<i>PA Act. Exhibits Table 10</i>	X	N	19	N/A
D.4.	Plan Premium Development for 21-Year-Old Non-Tobacco User	X	N	13	N/A
	<i>PA Act. Exhibits Table 11</i>	X	N	20	N/A
D.5.A.	Age and Tobacco Factors	X	N	13	N/A
	<i>PA Act. Exhibits Table 12</i>	X	N	21	N/A
D.5.B.	Geographic Factors	X	N	13	N/A
	<i>PA Act. Exhibits Table 13</i>	X	N	21	N/A
D.5.C.	Network Factors	X	N	13	N/A
	<i>PA Act. Exhibits Table 14</i>	X	N	21	N/A
D.5.D.	Service Area Composition	X	N	13	N/A
D.5.E.	Composite Rating	X	N	13	N/A
D.6.	Actuarial Certifications	X	Y	14-15	Y
Additional Exhibits					
E.	Department Plan Design Summary & Rate Tables	X	N	22-33	N/A
	Service Area Map	X	N	79	N/A
Redaction Justification (must be submitted if any information is redacted)		X			Y