

Partners Insurance Company, Inc. – Individual Plans

Rate Request filing ID # PICI-134098077 – 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: 0% Revised requested average rate change: 0%

Range of requested rate change: 0.00% to 0.00% Effective date: January 1, 2025

Mapped members: 0

Available in: Rating Area 6

Key Information

Jan. 2023-Dec. 2023 financial experience

Premiums	\$0	
Claims	\$0	
Administrative Expenses	\$0	
Taxes & Fees	\$0	
	_	
Insurers made (after taxes)	\$0	

How it plans to spend your premium¹

This is how the insurance company plans to spend the premium it collects in 2025

Claims: 88%
Administrative: 7%
Taxes & Fees: 5%
Profit: 0%

The insurer expects its annual medical costs to increase 6.6%.

Our Decision

The statewide average rate change request across all insurers was originally 9.3% and was revised to 6%. A factor contributing to the rate change is the change in reimbursement from the state reinsurance program. In addition to the reinsurance program, the following have been cited as key rate drivers:

- Increased hospital, physician, and prescription drug costs;
- Increased anticipated subscriber usage;
- Changes in anticipated risk adjustment amounts (money from a federal program that redistributes funds from plans with lower-risk enrollees to plans with higher-risk enrollees);
- Increased administrative expenses; and
- The base experience claims deviated from expected claim levels.

¹ Due to rounding, the percent total, in How it plans to spend your premium section, may not sum to 100%.



Process and Considerations for the 2025 Plan Year

Consistent with plan year 2024, the Department instructed insurers to file requested rates for 2025 Affordable Care Act compliant plans assuming the federal government would not make Cost-Sharing Reduction (CSR) payments. Cost-Sharing Reductions apply to certain out-of-pocket costs, like deductibles and copayments, for low- and middle-income enrollees. Although the federal government has stopped making CSR payments, insurers are still required by federal law to reduce out-of-pocket costs for low- and middle-income enrollees.

Insurers offering on-exchange silver plans adjusted premiums for those plans to compensate for the ending of federal CSR payments. This means that premiums for on-exchange silver plans are greater than the premiums for off-exchange silver plans. Many on-exchange consumers who receive the Advanced Premium Tax Credit (APTC) will not experience the full effect of any rate change because this subsidy will change as well. Consumers who have an on-exchange silver plan and do not qualify for a subsidy may want to consider evaluating other metal level plans available on-exchange or purchasing an off-exchange silver plan because these plans will likely have lower premiums relative to the coverage level.

Pennsylvania was granted a 1332 Waiver by the federal government allowing the Commonwealth to create a state-based insurance exchange (Pennie™) and reinsurance program. The state reinsurance program will reimburse insurers for a portion of claims above a set dollar amount threshold which will allow the companies to lower premiums. As a result of the reinsurance program, Pennsylvania residents who purchase individual ACA compliant health policies effective in 2025 will have premiums that are approximately 5% less on average than they otherwise would have been without that program.

For each requested plan, the Department reviewed the contract to see if the plan included all the benefits required by state and federal law, if the rates are reasonable in relation to the benefits, and if the insurer will be able to pay projected claims and expenses. The Department also considers factors such as the insurer's revenues, medical and administrative costs, actual and projected profits, and past rate changes, as well as the effect the 2025 rate change will have on Pennsylvania consumers. In approving rates for 2025, the Department focused on making sure that Pennsylvanians in every county in the state continue to have access to healthcare coverage. Ensuring that affordable options remain available to Pennsylvania consumers is a top priority for the Department. The resulting average final rate change approved for this insurer is #DIV/0!, ranging from 0.00% to 0.00%.

General Note: An insurer may not increase your rates more than once in a calendar year. The change in premium for a specific individual or employer may vary from the average rate change shown in this summary due to plan-specific factors, like the benefit package and provider





network used by the plan, as well as four factors specific to the individual or employer/employees: geographic location, age, tobacco use, and family size.





What we consider

Premium is made up of three parts: medical claims, administrative expenses, and profit or loss. We review all of the information in rate filings for individual and small group health plans, including the plans' medical claims, administrative expenses, and projected profit or loss.

A key component used to calculate projected claims is medical trend. Medical trend is the change in claims costs over a specific period of time—usually one to two years—and is often based on both the company's past claims costs and what they expect to spend on claims in the future.

Administrative expenses are any expenses not related to the cost of medical claims; including, but not limited to, employee salaries and benefits, the cost of the company's office and equipment, customer service, appeals costs, taxes, agent commissions, etc.

The company's projected profit (or contribution to surplus) is a small part of the premium. The reasonableness of the projected profit may depend on the company's current surplus level and other factors.

Federal law requires health insurance companies to have a medical loss ratio (MLR) of at least 80%. This means that your insurance company must spend at least 80% of your premium dollars on medical care and activities that improve the quality of care. If your insurance company spends less than 80% on medical care and quality improvement then the company must give you money back in the form of a rebate. A medical loss ratio of 80% indicates that the insurer is using the remaining 20 cents of each premium dollar for administrative costs and profits. The Department does not approve rates in this market that appear likely to result in an MLR of less than 80%.

Glossary

Annual rate change: Companies normally file a rate change each year due to their medical claims experience. The annual rate request may or may not include benefit changes.

Average rate change: The average amount rates will change for all enrollees.

For individual health plans: How much your premium will change depends on your age, where you live, how many family members are covered on your plan, whether or not you or your family members smoke and which benefits you choose

For small employer health plans: The employer's premium will vary based on their employees' age, the employer's location, their employee's family size, and the benefits they choose.

Claims/Medical Costs: What the health plan spends on direct medical services including hospital stays, providers, and prescription drugs.

Individual Plans: Insurance you buy from an insurance company for yourself and/or your dependents; not insurance you get from your employer.

Premium: Under federal law, insurance companies can take into account only four factors when varying your rate in order to set the premium costs you will be charged each month. These four factors are:

- Age: Older people can be charged up to 3 times more for premiums than younger people.
- Geographic location: Where you live has a big effect on your premiums. Competition, local regulation, and cost of living in different areas account for this.
- Tobacco Use: Insurers can charge tobacco users up to 50% more than those who don't use tobacco.
- Individual vs. family enrollment: Insurers can charge more for a plan that covers a spouse and/or dependents.

Profit: The amount of money remaining after the company's claims, administrative expenses, and taxes and fees are paid.

Rate: The rate is the base amount that an insurance company charges a person. An insurance company can increase the base rate depending on four factors in order to calculate the monthly premium that a consumer will be charged. See "Premium."

Rating Area: Federal law requires that each state have a set number of geographic areas that all insurance companies may use to adjust how much they charge consumers. When insurance companies calculate premiums, all enrollees within a rating area will have the same adjustment factor applied. Depending on the rating area you live in the prices you pay may be higher or lower than the state average. Pennsylvania has 9 rating areas. (See the Pennsylvania Geographic Rating Area Map below.)





Small Group Plans: Small group plans are those sold to employers with 1-50 employees.

Surplus: An insurer's funds on hand for which the company has no corresponding liabilities. Insurers maintain a surplus so that they have sufficient funds to withstand adverse business conditions such as unexpectedly high medical claims or low enrollment, and in order to make investments in infrastructure and technology.



Pennsylvania Geographic Rating Areas





July 31, 2024

Lindsi Swartz, MBA, MCM, Director PA Department of Insurance 1311 Strawberry Square Harrisburg, PA 17120

RE: Partners Insurance Company, dba Jefferson Health Plans NAIC Company ID#: 17416
Rate Filing for Individual Health Plans Effective 1/1/2025
PICI-134098077

Dear Ms. Swartz,

This rate filing contains the requested premium rate information for Partners Insurance Company, dba Jefferson Health Plans' (JHP) ACA-compliant individual health plans. The proposed rates are effective January 1, 2025. This filing has been submitted in SERFF under the tracking number PICI-134098077. The rates included in this refiling are intended to replace the rates filed on July 17th, 2024.

The changes included in this refiling relative to the filing submitted on May 15th are all from PID guidance. Changes include the change in reinsurance parameter, coinsurance increased from 50% to 60%. All changes are described in the supporting documentation that follows this letter.

Attached are the 2025 rate filing documents, per Federal and Pennsylvania guidelines. Included within this filing are the United Rate Review Submissions Parts I and III (Part II is not applicable), Rate Tables, Department Plan Design Summary and Rate Tables, Unique Plan Design Justification and Supporting Documentation, Department Standard Questions, PAAM Exhibits, and public rate filing redaction justification and checklist. JHP has elected to submit a single consolidated actuarial memorandum, which fully meets all the standards of both the Federal URRT instructions and the state instructions laid out in the PA 2025 ACA Final Rate Filing Guidance. We have included a crosswalk in the memorandum appendix that outlines in which sections the Federal requirements are satisfied.

Per guidance from the Pennsylvania Insurance Department (PID), this filing reflects a CSR defunding adjustment factor of 1.22 on all silver on-exchange plans, the prescribed induced demand formula, and an adjustment for reinsurance using the 2025 parameters.



As plan year 2025 is JHP's first year offering a PPO plan in the Pennsylvania Individual Market, there is no rate change to report.

Information for the Pennsylvania Bulletin:

1.	Company Name and NAIC Number	Partners Insurance Company, dba
----	------------------------------	---------------------------------

Jefferson Health Plans

17416
2. Market Individual
3. On/Off or Off Exchange On and Off

4. Effective Date of Coverage January 1, 2025 to December 31,

2025

5. Average Rate Change Requested N/A
6. Range of Rate Changes Requested N/A
7. Total Additional Annual Revenue Commented N/A

7. Total Additional Annual Revenue Generated N/A from Proposed Rate Change

8. Products

9. Rating Areas and Any Changes from 2024 Ratin

10. Metal Levels and Catastrophic Plans

11. Current Covered Lives and Policyholders as

of February 1, 2024

12. Number of Plans Offered in 2025 and Change from 2024

13. Corresponding Contract Form Number, SERFF and Binder ID Numbers

14. HIOS Issuer ID Number and Submission Tracking Number

PPO

Rating Area 6
Gold, Silver, Bronze

0

9 Plans in 2025 0 Plans in 2024

Form #: PICI-134094722

SERFF Filing #: PICI-134098077 Binder ID #: PICI-PA25-125118554

HIOS Issuer ID: 19702

State Tracking #: PICI-134094722

[REDACTED]

Date: July 31, 2024

Actuarial Memorandum

Partners Insurance Company, dba Jefferson Health Plans

Issuer ID #19702

Pennsylvania Individual Health Insurance 2025 Premium Rate

Filing: CONFIDENTIAL

Date: July 31, 2024

Rates Effective: January 1, 2025

Developed by:

Wakely Consulting Group, LLC, an HMA Company

[REDACTED]

[REDACTED]



Contents

Ex	(ecl	ıtive Summary	2
1.	Ва	asic Information and Data	3
	A.	COMPANY INFORMATION	3
	B.	RATE HISTORY AND PROPOSED VARIATIONS IN RATE CHANGES	5
	C.	AVERAGE RATE CHANGE	5
	D.	MEMBERSHIP COUNT	5
	E.	BENEFIT CHANGES	6
	F.	EXPERIENCE PERIOD CLAIMS AND PREMIUM	6
	G.	CREDIBILITY OF DATA	6
	Н.	TREND IDENTIFICATION	7
	l.	HISTORICAL EXPERIENCE	7
2.	Ra	ate Development and Change	7
		PROJECTED INDEX RATE, MARKET-ADJUSTED INDEX RATE & TOTAL ALLOW	
		AIMS	
		RETENTION ITEMS	
		NORMALIZED MARKET-ADJUSTED PROJECTED ALLOWED TOTAL CLAIMS	
		COMPONENTS OF RATE CHANGE	
		an Rate Development	
		an Premium Development for 21-Year-Old Non-Tobacco User	
5.		an FactorsAGE AND TOBACCO FACTORS	
		GEOGRAPHIC FACTORS	
		NETWORK FACTORS	
		RATE CHANGE SUMMARY	
		SERVICE AREA COMPOSITION COMPOSITE RATING	
^		CONNECTIVITY FACTORS	
		erminated Plans and Products RRT Warnings	
		fective Rate Review Information	
		eliance	
		Augrial Cartification	21



Executive Summary

This actuarial memorandum and the accompanying appendices represent documentation to support the filing of premium rates for Partners Insurance Company, dba Jefferson Health Plans (JHP) individual ACA products effective January 1, 2025. **This actuarial memorandum fulfills the requirements for both the United Rate Review Part III Actuarial Memorandum and the Pennsylvania Actuarial Memorandum.** As such, only one actuarial memorandum has been submitted with this filing. In Appendix A, we provided a crosswalk from the Pennsylvania Actuarial Memorandum to the United Rate Review Part III Actuarial Memorandum to ensure compliance with both sets of instructions and assist with review.

Per Pennsylvania Insurance Department (PID) guidance, the premium rates contained in this memorandum include the impact of the state-based reinsurance program, as defined within the 1332 waiver approved in 2021. Per PID guidance, the 2025 reinsurance parameters to be included in this filing reflect an attachment point of \$60,000, a cap of \$100,000, and a coinsurance percentage of 60%.

The rates included in this refiling are intended to replace the rates filed on July 17th, 2024. The changes included in this refiling relative to the filing submitted on July 17th are to reflect the updated reinsurance parameters per PID guidance. These updates are reflected within this documentation and the filed rates.

This version of the actuarial memorandum is considered **CONFIDENTIAL** as it contains proprietary information related to JHP and Wakely Consulting Group, LLC, an HMA Company (Wakely). A separate actuarial memorandum was submitted and deemed PUBLIC which excluded all information determined to be confidential, according to PID guidance. Per PID instruction, we have submitted a redaction justification form along with this filing.

We believe the premium rates filed are reasonable in relation to the benefits provided and are not excessive, inadequate, or unfairly discriminatory based on the provisions of the ACA as currently implemented; however, future modifications in legislation, regulation, and/or court decisions may affect the extent to which the premium rates are neither excessive nor deficient. Wakely and JHP would like to reserve the right to change assumptions that were materially impacted due to a change in the regulatory environment or up until filings are approved, in order to ensure our rates are as accurate as possible, to the extent state and federal rules allow.

At the time of this rate filing, there are still ongoing negotiations involving JHP provider contracts. Assumptions regarding JHP's reimbursements relative to other ACA carriers for estimated contracts that are still undergoing negotiation have been incorporated in pricing and were deemed reasonable. Additionally, with the conclusion of the Public Health Emergency, there has been and will continue to be an influx of Medicaid re-determination members transitioning into the ACA



merged market. While assumptions have been modeled regarding demographic shifts, there is significant uncertainty regarding the morbidity of this population and how it will impact both JHP and other carriers within the state, which influences both claims costs and risk adjustment. JHP will continue to analyze potential impacts as more experience is gained. If subsequent information become available that would materially affect this rate filing submission, JHP requests the right to revise pricing assumptions and resubmit with more appropriate premium rates.

JHP is entering the PA market in 2025; therefore, this filing presents premium rates for new products. To be compliant with the ACA single risk pool regulation, on- and off-Exchange premium rates were developed together. The JHP products include gold, silver, and bronze plans. In total, JHP is filing 9 plans, plus CSR variants for all silver plans. Plans will be offered in Rating Area 6. All plans will be offered on- and off-Exchange, as shown in Table 1 below.

Plan designs include 2025 EHBs. Plans do not include pediatric dental as there are standalone pediatric dental plans available in JHP's service area already. There are no additional non-EHBs included in any plan designs. All plans are PPO with benefits offered in and out of network.

Table 1: 2025 Proposed Plans

Plan ID	Plan Name	Exchange	Service Area
19702PA0010006	Jefferson Health Plans + Total + Silver + PPO	On and Off	Rating Area 6
19702PA0010005	Jefferson Health Plans + Balanced + Silver + PPO	On and Off	Rating Area 6
19702PA0010004	Jefferson Health Plans + \$0 Deductible + Silver + PPO	On and Off	Rating Area 6
19702PA0010001	Jefferson Health Plans + \$0 Deductible + Bronze + PPO	On and Off	Rating Area 6
19702PA0010002	Jefferson Health Plans + Total + Bronze + PPO	On and Off	Rating Area 6
19702PA0010007	Jefferson Health Plans + \$0 Deductible + Gold + PPO	On and Off	Rating Area 6
19702PA0010008	Jefferson Health Plans + Total + Gold + PPO	On and Off	Rating Area 6
19702PA0010009	Jefferson Health Plans + Value + Gold + PPO	On and Off	Rating Area 6
19702PA0010003	Jefferson Health Plans + Value + Bronze + PPO	On and Off	Rating Area 6

JHP products will be sold through an agency/broker model, through the internet, in direct response to incoming inquiries, and through the Pennsylvania Exchange. Products are guaranteed issue, guaranteed renewable, and issued on an issue age basis.

1. Basic Information and Data

A. COMPANY INFORMATION

Company Legal Name: Partners Insurance Company, dba Jefferson Health Plans



State: PA

HIOS Issuer ID: 19702

Market: Individual

Effective Dates: January 1, 2025 – December 31, 2025

Company Contact Information

Primary Contact Name: [REDACTED]

Primary Contact Telephone Number: [REDACTED]

Primary Contact Email Address: [REDACTED]

Secondary Contact Name: [REDACTED]

Secondary Contact Telephone Number: [REDACTED]

Secondary Contact Email Address: [REDACTED]

Responsible Actuary Information

Responsible Actuary Name: [REDACTED]

Company: Wakely Consulting Group, LLC, an HMA Company

Phone Number: [REDACTED]

Email Address: [REDACTED]

SERFF Rate Review Detail

Projected Earned Premium: \$4,928,489.

Projected Incurred Claims: \$4,359,119.

Proposed Rate Premium PMPM: Min: \$271.74. Max: \$1,814.90. Weighted Average: \$821.41.

Please note that the premium PMPMs are indicative of age-specific rates and include a blend of tobacco-rate and non-tobacco rate plans.



Other General Information

Type of Filing: New

Type of Plan: PPO On and Off-Exchange; New Business

Months of Rate Guarantee: These rates will be guaranteed until December 31, 2025.

B. RATE HISTORY AND PROPOSED VARIATIONS IN RATE CHANGES

JHP is a new plan in 2025 and, therefore, does not have a rate increase from 2024 to 2025.

C. AVERAGE RATE CHANGE

JHP is a new plan in 2025 and, therefore, does not have a rate increase from 2024 to 2025.

D. MEMBERSHIP COUNT

JHP is a new plan in 2025 and, therefore, does not have any experience period or current membership to report. Projected 2025 membership by metal is included in Table 1 of the PAAM Exhibits. Actual enrollment is highly dependent on consumer decisions and the competitiveness of rates in the market.

Table 2 shows 2025 JHP individual enrollment projections by plan.

Table 2: Estimated JHP Enrollment by Plan (in Member Months)

Plan ID	Plan Name	Member Months
19702PA0010006	Jefferson Health Plans + Total + Silver + PPO	779
19702PA0010005	Jefferson Health Plans + Balanced + Silver + PPO	779
19702PA0010004	Jefferson Health Plans + \$0 Deductible + Silver + PPO	779
19702PA0010001	Jefferson Health Plans + \$0 Deductible + Bronze + PPO	483
19702PA0010002	Jefferson Health Plans + Total + Bronze + PPO	483
19702PA0010007	Jefferson Health Plans + \$0 Deductible + Gold + PPO	738
19702PA0010008	Jefferson Health Plans + Total + Gold + PPO	738
19702PA0010009	Jefferson Health Plans + Value + Gold + PPO	738
19702PA0010003	Jefferson Health Plans + Value + Bronze + PPO	483



E. BENEFIT CHANGES

JHP is a new plan in 2025 and, therefore, does not have any benefit changes from 2024 to 2025.

F. EXPERIENCE PERIOD CLAIMS AND PREMIUM

JHP will begin offering products effective January 1, 2025; therefore, there is no JHP experience to report. For this reason, Tables 2-4 of the PAAM Exhibits and Worksheet I of the URRT have been left blank. The 2025 rates are based entirely on a manual rate as discussed in the next section of this memorandum, and as shown in Tables 2b-4b of the PAAM Exhibits.

Projection Factors

Initial products will be effective January 1, 2025; therefore, projection factors for purposes of moving the experience forward to the projection period are not applicable. In the Rate Development & Change section of this report, we discuss the development of claim costs used within the base periods and factors applied from the base period to the projection period as a basis for the development of the index rate and base rate.

G. CREDIBILITY OF DATA

Given JHP will begin offering products effective January 1, 2025, and has no experience to report, 100% credibility is assigned to the manual rate. The manual rate source is described below.

Base Period Claims

Allowed PMPM medical and pharmacy claim costs were developed using 2022 PA ACA individual statewide incurred claims from 2024 URRTs. This represents the most recent year of Pennsylvania ACA data available publicly. Pharmacy payments are assumed to be reduced for rebates. Claims have been adjusted to exclude non-EHBs. This data is assumed to be complete.

Wakely believes this data is reasonable and actuarially sound for purposes of the rate development. The data presented in Table 2b of the PAAM exhibits represents the 2022 statewide base period data, as used for the rate development, before the adjustments discussed below were applied.

Adjustments Made to the Base Data



The base period allowed PMPMs were adjusted for items including differences in membership mix by metal, risk, average age, geographic service area, utilization and unit cost trends, provider contracts, and COVID-19 impact. Factors to account for these adjustments were applied to the base period total allowed EHB claims to develop the projected index rate in Table 5 of the PAAM Exhibits. Development of these adjustment factors is detailed in the "Rate Development and Change" section of this memorandum.

H. TREND IDENTIFICATION

As 2025 is JHP's first year in the market, the trends were developed using public data sources and PA insights from JHP; no experience trends were analyzed. Thus, Table 3 has been intentionally left blank.

An explanation of the trend development for values provided in Table 3b of the PAAM exhibits is provided in section 2, Rate Development & Change.

I. HISTORICAL EXPERIENCE

As 2025 is JHP's first year in the market, there is no historical experience. Table 4 has been intentionally left blank.

The historical experience used to fill out Table 4b is from Pennsylvania Individual URRT data from 2022, as described in section 1G. Please note that the data in the URRT is provided on an annual basis only. The monthly splits shown in Table 4b are for illustrative purposes only. The 2023 section is not able to be filled in as that data is not available yet.

Rate Development and Change

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

Please see Table 5 of the PAAM exhibits for the development of the projected index rate. The development of the single risk pool adjustment factors is provided in Appendix B.

Total Allowed Claims

Section 1G describes the source for the base period total allowed EHB claims in cell D11 of Table 5. The adjustment factors described below are used to calculate the projected index rate of \$957.50 in cell C27 of Table 5.



TREND FACTORS

Trend estimates used in the JHP 2025 rate development were based on a review of prospective claim cost trend information published in the 2024 Pennsylvania URRT individual rate filings. A range of reasonable trend assumptions was identified before selecting the used trends.

While the trend factor displayed in cell D12 of Table 5 is excluding the impact of COVID-19, when developing trend estimates, results were reviewed in tandem with the effect of COVID-19 from the base period to the projection period for reasonability. The value in D12 represents a weighted average trend factor for two years assuming the base period is on a 2022 basis.

CHANGES IN MORBIDITY

Per PID guidance, the impact of morbidity due to the reinsurance program is 0%, as shown in cell D15 of Table 5.

JHP is not applying any changes in morbidity to the risk pool from the base prior to the projection periods that aren't already accounted for in JHP's projected age, metal, and risk mixes. There is no explicit adjustment applied to account for the influx of Medicaid re-determination members transitioning into the ACA merged market. While assumptions have been modeled regarding demographic shifts, there is significant uncertainty regarding the morbidity of this population and how it will impact both JHP and other carriers within the state, which influences both claims costs and risk adjustment. Given this uncertainty, we are not adjusting the morbidity of the base period to the projection period, and the adjustment factor in cell D16 of Table 5 is 1.0.

CHANGES IN DEMOGRAPHICS (MEMBERSHIP MIX AND GEOGRAPHY)

A two-step approach was taken to account for changes in membership mix by age band, metal tier, and geographic location between the base period Pennsylvania Individual market statewide experience and the 2025 JHP estimated membership. Allowed claims were decreased based on changes in membership mix by age band and metal tier between the base period URRT experience and the 2025 JHP estimated membership in Pennsylvania. We took the following steps using relativities based on allowed claims:

- 1) Adjusted from the base year (2022) statewide Pennsylvania enrollment mix by rating area to JHP's projected rating area mix in their 2025 service area.
- 2) Adjusted from the base year statewide Pennsylvania enrollment mix by age band and metal to JHP's projected age band and metal mix in their 2025 service area.



3) Adjusted to reflect JHP having more members with an HCC diagnosis compared to the market, at the same age band and metal mix i.e., less healthy population resulting in a claim cost increase.

Adjustment 1) uses the 2023 Interim Risk Adjustment Report (RAR) relativities released by CMS on March 14th to calculate an average statewide geographic cost factor. The corresponding relativities were then weighted by the estimated membership mix in JHP's service area. The ratio of the average cost factor for JHP's distribution within its service area to that of the statewide distribution represents the geographic adjustments.

Adjustment 2) represents utilization differences based on variance between the starting age and metal distribution and the ending age and metal distribution. Utilization differences by age band and metal tier were derived using Wakely's proprietary database which consists of a nationally-representative sample of approximately 53.7 million member months comprised of individual data for ACA-compliant plans. This data set is considered fully credible at each metal level. The database is subsequently referred to as the "Wakely ACA Database" throughout this memorandum.

These adjustments are illustrated in Appendix B. For Adjustments (2) and (3), we are unable to share the actual data underlying the proprietary database, however the exhibit illustrates our methodology for this adjustment using arbitrary numbers.

The factor shown in D18 of Table 5 within the PAAM exhibits represents the product of the adjustments 1), 2), and 3).

CHANGE IN NETWORK (PROVIDER CONTRACTING)

[REDACTED]

CHANGE IN BENEFITS

A multiplicative factor was applied to reduce the base period claims by the average amount of non-EHB claims in the base periods, as defined in the 2024 URRT submissions. The same methodology was used to remove non-EHB claims from our manual base period. A reduction of \$1.78 PMPM is already accounted for in cell D11 of Table 5, so it is not included as an adjustment factor in cells D15:D21.

No other adjustments were made as there have been no changes in EHBs or state mandated benefits in Pennsylvania since before the base period year. JHP is not offering benefits in addition to the EHBs in 2024, so cell C38 of Table 5 is \$0.



CHANGE IN OTHER

[REDACTED]

PEDIATRIC DENTAL COSTS

No adjustments were made to account for pediatric dental costs.

INCLUSION OF CAPITATION PAYMENT

There are no capitated payments in the projection period to consider for the development of the index rate.

Paid to Allowed Ratio

Plan designs were modeled within the Wakely Pricing Valuation Model (WPVM), based on detailed claim data from the Wakely ACA database (described above), to develop paid-to-allowed pricing estimates (as opposed to the actuarial values from the federal AV calculator). The model uses actuarially sound pricing methods to value the impact of deductibles, copays, coinsurance and maximum out-of-pocket cost sharing parameters. We calibrated the utilization and unit cost assumptions in the model to the plan's prospective allowed costs, adjusting for induced demand by metal tier. The purpose of this is to calculate variation of actuarial values for pricing based on plan-specific cost-sharing.

The mandated CSR load of 22% for individuals enrolled within silver cost-share reduction variant plans was applied to all silver on-Exchange plan pricing AVs. While PID allows for a range between 22% to 30%, we believe that a load of 22% best aligns with JHP's projected silver enrollment distributions.

We then applied the pricing actuarial value for each plan to the JHP 2025 index rate for premium rate development.

Wakely used an override in cell C28 of Table 5 to better reflect our pricing methodology. The value in C28 can be calculated by weighting the pricing AVs, Non-Funding of CSR Adjustment, and Benefit Richness (Induced Demand) factors on tab "III Plan Rates".

Projected Risk Adjustment PMPM

The risk adjustment transfer amount was calculated to arrive at an estimated transfer amount for JHP's population. Various adjustments such as risk adjustment model methodology changes, age and metal mix distribution shifts, geographic differences, and statewide average premium



increases from the base period to 2025 were incorporated to obtain an estimated 2025 risk adjustment transfer.

We took the following steps to arrive at a projected risk adjustment transfer:

- At the metal level, each factor of the risk transfer formula was calculated separately for JHP's expected population and the statewide Pennsylvania 2025 estimates.
- **ARF** Age Rating Factors for JHP and Pennsylvania statewide were calculated based on the same enrollment mix by age band as was assumed in the claims buildup.
- **AV** Actuarial Value for Pennsylvania statewide was based on the same statewide Pennsylvania metal mix as was assumed in the claims buildup.
- PLRS Plan Liability Risk Score for statewide Pennsylvania and JHP started from the average PLRS in the Wakely ACA database data, specifically for members with the same age and metal mix as either statewide Pennsylvania or JHP's expected population in 2025. [REDACTED]
- **GCF** Geographic Cost Factors for JHP reflect their proposed service area.
- Using the above factors and an estimated statewide average premium, an estimated risk transfer for JHP was calculated at the metal level. This transfer amount was then weighted by JHP's expected metal mix in Pennsylvania in 2025.
- Then, a load was added to the risk adjustment transfer to account for the estimated high-cost risk pooling charge in 2025, calculated as a percent of premium.
- Finally, the risk adjustment transfer PMPM was converted from a paid to an allowed amount (dividing by expected actuarial value) necessary to capture sufficient premiums to cover anticipated transfer payments.

[REDACTED]

The 2025 risk adjustment user fee of \$0.18 PMPM was included in the taxes and fees section of the rate development.

Projected Exchange User Fees PMPM

The projected exchange user fees were calculated using a 3.0% exchange fee, per PID guidance. JHP is projecting that 90% of their 2025 membership will be on the exchange, so the effective exchange user fee is 2.7%.



<u>Projected ACA Reinsurance Recoveries Net of Reinsurance Premium</u>

Per state guidance, this refiling includes an adjustment for the state-based reinsurance program with an attachment point of \$60,000, a cap of \$100,000, and a coinsurance rate of 60%. Below describes our methodology for quantifying the impact of the state-based reimbursement.

The claims portion of the index rate was reduced to reflect the estimated impact of the statebased reinsurance reimbursement amounts. Because the reinsurance parameters are not projected to vary by region, the geographic factor is not impacted by reinsurance.

The information in Tab IIb was developed using Wakely's ACA database. First, members were assigned to allowed claim buckets based on their total annual allowed spend. Allowed spend from the proprietary database was projected to JHP's projected allowed claims. Paid PMPMs were determined using plan-level cost sharing parameters consistent with the pricing AV development. An effective reinsurance recovery was then calculated for each claim bucket, using the calculated paid PMPMs and the reinsurance program attachment points and coinsurance.

We have intentionally left Tab IIa blank as JHP does not have experience to report.

Market-Adjusted Projected Allowed Total Claims PMPM

As described above, the product of the components above calculates an allowed claims cost estimate for the average age, metal, and risk of JHP's population in the Pennsylvania market. Then, the JHP's risk adjustment transfer estimate is added to the blended allowed claims cost to arrive at a total allowed cost (claims and risk adjustment).

The projected allowed claim costs net of reinsurance was added to the projected risk adjustment transfer and exchange user fees to arrive at the total market-adjusted projected allowed cost PMPM (claims and risk adjustment) equal to \$891.22 PMPM. The MAIR presented between the PAAME, URRT, and Appendix of this memorandum should vary by no more than a penny due to rounding.

Please see Appendix D and Table 5 of the PAAM exhibits for more details.

B. RETENTION ITEMS

The retention items described below are illustrated in Table 6 of the PAAM exhibits. Please note that values in Table 6 vary from those mentioned in this memorandum, as the values used in Table 6 represent the straight average of the retention components across all plans, whereas we report total retention on a projected membership weighted average basis.



Administrative Expense Load

We incorporated a retention load for general administrative expenses, commissions, and quality improvement initiatives. These costs in total are equal to \$55.00 PMPM in the 2025 rate development, which corresponds to 6.7% of premium in aggregate. It was confirmed with JHP that the assumptions for 2025 administrative costs are reasonable estimates based on the estimation of covered members, although per PID guidance, the flat PMPM does not reflect the allocation methodology by plan in which JHP anticipates administrative costs to be spent.

The administrative expense load is split into three components:

- General and claims: 4.1%
- Agent/Broker Fees and Commissions: 1.8%
- Quality Improvement Initiatives: 0.8%

[REDACTED]

Profit / Contribution to Surplus & Risk Margin

Overall, the profit margin is equal to 0.1% of proposed 2025, prior to federal income taxes. This amount was confirmed with JHP to align with the overall company strategy. After accounting for federal income taxes, this amount decreases to 0.08%.

Taxes and Fees

Taxes and regulatory fees included in the development of 2025 rates include the following:

- 1. Federal Income Tax = 21.0% of taxable income.
- 2. Risk Adjustment User Fee = \$0.18 PMPM
- 3. Health Insurance Marketplace User Fee = 3%. We have included this amount in our pricing of premium for all policies sold within the Marketplace. This fee was spread across all plans in the risk pool. We assumed that 90% of JHP's individual policies would be sold within the Marketplace. This resulted in a Marketplace User Fee of 2.7% of premiums, applied to policies sold in and outside the Marketplace.
- 4. Premium tax = 2% of premiums
- 5. PCORI Fee = \$0.28 PMPM



Table 3 below summarizes the non-benefit expenses, regulatory fees, and taxes.

Table 3: Non-Benefit Expenses and Profit & Risk

Component	% of Premium
Commissions	1.8%
Administration	4.9%
Premium Tax	2.0%
Risk Adjustment Fee	0.02%
Exchange User Fee	2.7%
PCORI Fee	0.03%
Profit/Risk Margin	0.1%
Total Retention	11.6%
Target Loss Ratio	88.4%
Federal Loss Ratio	93.7%

Projected Loss Ratio

The Anticipated Loss Ratio (ALR) is defined as being the present value of expected benefits over the present value of expected premiums for the time period that the premiums are effective. Wakely estimates the ALR to be 88.4%. This calculation does not exclude any regulatory fees or taxes from premiums, which is why it is lower than the federal MLR calculation.

Based on the federal MLR methodology, the loss ratio is estimated to be 93.7%; therefore, JHP does not anticipate paying consumer rebates for the 2025 plan year. Regulatory fees and taxes were excluded from premiums in the calculation of this value.

C. NORMALIZED MARKET-ADJUSTED PROJECTED ALLOWED TOTAL CLAIMS

Age, geographic, tobacco, and network calibration factors are applied uniformly to all plans and illustrated in Table 7 of the PAAM exhibits. The factors described below also match those in the "Calibration" section of Table 10.

The development of the 2025 normalization factors is included within Appendix E.



Age Calibration

Per the instructions, plan adjusted index rates were next calibrated to age 21. To bring the experience to age 21 rate, we divided the plan adjusted index rate by the weighted average age factor. The age factor was calculated using the Federal ACA age factors, as adopted by Pennsylvania, weighted by the estimated enrollment by age for JHP's Pennsylvania population in 2025. The age associated with this factor is between 49 and 50 years. Once calibrated, the standard federal age factors can be applied on a multiplicative basis to get to the rates for other ages.

Tobacco Rating

The plan adjusted index rate must be on a non-tobacco user basis. Wakely looked at the proportion of JHP 2024 open enrollees who admitted to smoking and are paying a tobacco loaded premium rate in 2024. This is 2.6% of total membership. The final factor is intended to convert the rates to a non-tobacco basis. To bring the experience to an age 21 rate, we divided the plan adjusted index rate by the weighted average tobacco usage factor of 1.002.

The tobacco rate-up factor is 1.002. We applied the same factor for all ages (21+) that are allowed to have a smoking factor.

Geographic Factors

JHP will only be in one rating area therefore, we assumed a 1.000 geographic factor for all plans.

Network Factor

JHP will only have one network, therefore, we assumed a 1.000 network factor for all plans.

D. COMPONENTS OF RATE CHANGE

JHP is a new plan in 2025, therefore, there is no rate change from 2024 to 2025.

For this reason, Table 8 of the PAAM exhibits is left mostly incomplete. Per PID rate filing guidance, the values in row H should approximate the values in row A. For JHP, the values in row A are producing errors, as the Total Calibrated Plan Adjusted Index Rate (PMPM) calculated in AA15 on "III Plan Rates" is based on current membership as of 02-01-2024, which JHP does not have. If we instead weight based on projected membership, the values in rows A and H do tie.

Table 9 is also not applicable since JHP is a new plan in 2025.



3. Plan Rate Development

Single Risk Pool

JHP has established a single risk pool for all individual market business. Since JHP will be new to the individual market, all its individual business will be non-grandfathered, non-transitional, and ACA-compliant.

Index Rate for Experience Period

JHP has no experience in Pennsylvania in 2023. Therefore, there is no experience period index rate.

Index Rate for Projection Period

The projection period claims portion of the index rate is estimated to be \$957.50 PMPM. This was calculated based on projected allowed claims for essential health benefits for the single risk pool population during the projection period.

Market-Adjusted Index Rate for Projection Period

We then included the impact of risk adjustment, converted to an allowed basis, and the equivalent Marketplace User Fee (as described above), to calculate the 2025 market adjusted index rate. The market adjusted index rate is \$891.22 PMPM.

Plan-Adjusted Index Rate for Projection Period

Plan adjusted index rates were developed by applying allowable plan level adjustments to the market adjusted index rate. The section below describes the components included in Table 10 of the PAAM exhibit which build up to the plan adjusted index rate.

AV Metal Levels

The 2025 Federal Actuarial Value Calculator (AVC) was used to generate the AV metal tiers (URRT, Worksheet 2). We have incorporated the 2025 de minimus range to the allowed plans.

The final AV is calculated in the Federal AV Calculator by inputting the cost-sharing components for each plan (deductible, MOOP, coinsurance, etc.). To accommodate certain benefit designs, we made the following adjustment:

Tiers of Generic Drugs



On a subset of plans, JHP will offer two generic drug tiers with varying copays.
 As a result, a blended effective generic copay was input into the AV calculator to reflect the expected utilization between the two generic tiers.

The federal AVs for the plans are shown in Appendix F and in column H of Table 10 of the PAAM exhibits. Column I of Table 10, as well as the UPD, lists which plan IDs this adjustment applies to. More information regarding the adjustments have been included in unique plan design justification and documentation.

AV Pricing Values

The methodology for development of the AV Pricing Values is included in the Projected Index Rate, Market-Adjusted Index Rate & Total Allowed Claims section above. Only allowable modifiers were used in the development of these values.

Differences in morbidity across metal tiers were not included in the pricing development for each metal tier plan.

The pricing AVs differ from the Federal AVC outputs primarily because the estimated allowed PMPMs used in developing pricing AVs are different than those underlying the Federal AV calculator. This is due to a leveraging effect for fixed cost sharing elements (e.g. copays, deductibles and MOOPs). The other variance is differences in the methodology of the pricing models and underlying data of the modeling. AV pricing values, prior to the addition of the CSR defunding adjustments for on exchange silver plans, are presented in column K of Table 10 of the PAAM exhibits.

We have included an adjustment to the filed plans to reflect the impact of cost share reduction subsidies (CSRs) no longer being funded by the federal government. The regulation still requires CSR variant plans to be offered to low-income members, under the same Federal AV requirements (keeping similar plan design and cost sharing structures as the current regulations), but the subsidy amounts will instead be a liability to the insurers and not the government. To reflect the additional cost of the CSRs for all JHP silver plans, we have increased the pricing AVs. This translates to the mandated increase of 22% (multiplicative) to silver plan pricing AVs offered on the Exchange. The CSR defunding adjustments are shown in column P of Table 10.

Benefit Richness Factors

Per PID guidance, the benefit richness factors in column L of Table 10 of the PAAM exhibits were calculated using the IU formula of (Plan AV)² – Plan AV + 1.24. The benefit richness factors shown here are normalized to a 1.0 using projected membership. These values are also shown



in Appendix G. The benefit richness factors are calculated using the product of both the pricing AV and the non-funding of the CSR adjustment.

Together, the product of the pricing AV, non-funding of CSR adjustment, and benefit richness factors are equivalent to the "AV and Cost Sharing" line within Worksheet 2 of the URRT. Any minor deviations from URRT Worksheet 2 are due to rounding.

Adjustments for Benefits in Addition to EHB

JHP is not offering any benefits in addition to EHBs, so all factors in column M of Table 10 are 1.0.

Adjustments for Provider Network

JHP is only offering one network, so all factors in column N of Table 10 are 1.0.

Adjustments for Catastrophic Eligibility

JHP is not offering catastrophic plans, so all factors in column O of Table 10 are 1.0.

Adjustment for Administrative Costs, Taxes and Fees, and Profit or Contingency

Administrative costs vary by plan as discussed in section 2B above. The retention components are shown in columns R:T in Table 10 and in rows 2.6-2.8 of Worksheet 2 of the URRT. These components are reported as a percent of gross premium, per instructions.

Calibrated Plan Adjusted Index Rate

The calibrated plan adjusted index rates PMPM calculated in row AA use the calibration factors described in section 2C. The values calculated in Table 10 match the values calculated in row 3.14 of Worksheet 2 of the URRT.

4. Plan Premium Development for 21-Year-Old Non-Tobacco User

Consumer Adjusted Index rate

The consumer adjusted index rates were calculated by multiplying the calibrated plan adjusted index rates by the consumer's specific age factor (subject to maximum allowable rating of 3 dependents under age 21), area factor, and tobacco load as applicable.



We used the Federal ACA age factors, as adopted by Pennsylvania, for all members and geographic factors that were discussed previously. For tobacco factors, we used a level rating factor of 1.100 for all adult ages.

The rating factors are shown in Appendix H and the consumer adjusted index rates are provided in Table 11 of the PAAM Exhibits. The values in column AA of Table 11 match the age 21 non-tobacco rates provided in the federal and state rate tables.

Plan Factors

A. AGE AND TOBACCO FACTORS

A description of these factors is included in section 2C. See table 12 of the PAAM exhibits for the age and tobacco factors used in the rate development process.

B. GEOGRAPHIC FACTORS

A description of these factors is included in section 2C. See table 13 of the PAAM exhibits for the geographic factors used in the rate development process. As JHP is only entering rating area 8 in 2025, the geographic factor is 1.0.

C. NETWORK FACTORS

A description of these factors is included in section 2C. See table 14 of the PAAM exhibits for the network factors used in the rate development process. As JHP only has one network in 2025, the network factor is 1.0.

D. RATE CHANGE SUMMARY

2025 is JHP's first year in the Individual ACA market. For that reason, the "Overview" and "Key Information" sections of tab "VI Rate Change Summary" of the PAAM exhibits have been left blank.

We confirm that the information in the "How It Plans to Spend Your Premium" section matches the retention and claims components in Tables 5 and 6, with the exception of the exchange user fees. As mentioned in section 2B above, the retention values shown in these tables are not necessarily reflective of our average projected retention due to enrollment weighting differences.



E. SERVICE AREA COMPOSITION

JHP will only be entering Lehigh and Northampton counties within rating area 6 in 2025. This is reflected in the service area map.

F. COMPOSITE RATING

JHP is not using composite rating in 2025.

G. CONNECTIVITY FACTORS

JHP's 2025 products do not include connectivity features, and as such no connectivity factors are included in this rate filing.

6. Terminated Plans and Products

There will be no plans terminated in 2025 since JHP is filing all new plans.

7. URRT Warnings

There are no warnings appearing in the URRT.

8. Effective Rate Review Information

Additional information available upon request.

9. Reliance

Jefferson Partner Plans (JHP) has provided Wakely Consulting Group, LLC, an HMA Company, 8000 South Chester Street, Suite 650, Centennial, CO 80112 (Wakely) with information used to develop the 2025 Pennsylvania individual commercial product premium rates. This information includes, but is not limited to, the following:

- Estimated 2025 enrollment figures by rating area, metal, variant, network, and exchange status; and
- Geographic region to be covered in 2025; and



- Benefit designs illustrating Federal metal level compliance and compliance with Pennsylvania specific regulations; and
- Federal actuarial value calculator (AVC) inputs; and
- General administrative expenses, profit margin, and other retention components, resulting in an estimated federal MLR equal to 93.7%; and
- Quality initiatives (QI) allowed to be treated as QI under regulatory rules; and
- Product design information including a statement that 2025 coverage will only include EHBs, and will not cover pediatric dental, and
- Estimated contract reimbursements for in-network providers; and
- PBM contracts and assumptions for items not yet determined; and
- Out-of-network (OON) utilization and unit cost assumptions; and
- Proportion of CSR members estimated to be enrolled in JHP plans in 2025; and
- Plan design documentation and the method of plan adjudication; and
- Annual utilization trends for 2022-2025 by category of service.

10. Actuarial Certification

[REDACTED]

- 1. The premium rates filed are in compliance with applicable laws, rules and guidelines of the State of Pennsylvania.
- 2. The premium rates filed are reasonable in relation to the benefits provided and are not excessive, inadequate, or unfairly discriminatory based on the provisions of the ACA as currently implemented. The actuarial soundness of the block of business is dependent on projected membership distribution by plan, which we received from JHP.
- 3. The premium rates are calculated on the basis of sound actuarial principles.
- 4. The premium rates are reasonable when related to the applicable coverage and characteristics of the applicable class of enrollees.



- 5. The projected index rates are developed in accordance with all applicable State and federal statutes and regulations (45 CFR 156.80 and 147.102) and with allowable modifiers used in the development of plan specific premium rates.
- 6. The premium rates filed are in compliance with the Actuarial Standards of Practice (ASOPs) promulgated by the Actuarial Standards Board that are listed below:

ASOP No. 5, Incurred Health and Disability Claims

ASOP No. 8, Regulatory Filings for Health Plan Entities

ASOP No. 12, Risk Classification

ASOP No. 23, Data Quality

ASOP No. 25, Credibility Procedures Applicable to Accident and Health, Group Term Life, and Property/Casualty Coverages

ASOP No. 41, Actuarial Communication

ASOP No. 42, Determining Health and Disability Liabilities Other Than Liabilities for Incurred Claims

ASOP No. 50, Determining Minimum Value and Actuarial Value under the Affordable Care Act

ASOP No. 56, Modeling

In our opinion, the premiums are reasonable in relation to the benefits provided and the population anticipated to be covered. Further, the premiums are not estimated to be either excessive or deficient based on the provisions of the ACA as currently implemented. Actual experience will vary from the estimates given the inherent uncertainty in developing premium rates under the ACA.

The index rate, allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2), and Pennsylvania's mandated CSR load and HHS induced utilization formula 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 ASOPs.

The Federal AV Calculator (with some modification) was used to determine the AV Metal Values shown in Worksheet 2 of the Unified Rate Review Template for all plans.

The Part I Unified Rate Review Template does not demonstrate the process used to develop the rates. 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.



Sincerely,

[REDACTED]

Date: July 31, 2024



Appendices

Appendix A – URRT III Actuarial Memorandum to Pennsylvania Actuarial Memorandum Crosswalk

Appendix B – Development of Single Risk Pool Adjustment Factors

Appendix C – Development of the Projected Risk Adjustment Transfer

Appendix D – Development of the 2025 Index Rate

Appendix E – Development of the 2025 Normalization Factors

Appendix F - Federal Actuarial Values

Appendix G – Induced Demand Factors

Appendix H – Rate Manual and Rate Formula

Appendix I – Projected Reinsurance Impact



Appendix A

URRT III Actuarial Memorandum to Pennsylvania Actuarial Memorandum Crosswalk

Corresponding Federal Memo Section	Pennsylvania Memo Requirement	Pennsylvania Section Number
Company Contact Information	Basic Information and Data - Company	1A
	Basic Information and Data - Rate	
	History and Proposed Variations in	1B
	1 '	
Reason for Rate Increase(s)	_	1C
		2D
		5D
	,	
Paid through Date	Basic Information and Data -	
		1F
Current Date	1 '	
	Premium	
_		
Experience remod	Rasic Information and Data - Benefit	
Benefit Categories		1E
	-	
Trend Factors (Cost and utilization)		1H/2A
Morbidity Adjustment		
	-	
	1 *	2A
	·	
,		
The state of the s		1G
	-	
· ·	1	2A
Inclusion of Capitation Payments	Projected Index Rate, Market-	
Description of the credibility methodology used		
	1	1G
	Credibility of Data	
period experience		
Establishing the Index Rate	Plan Rate Development	3
Small Group Quarterly Rate Filings	N/A	N/A
Development of the Market-wide Adjusted	Rate Development & Change -	
Index Rate	· -	2A
	1 -	
Reinsurance	1 '	
Risk Adjustment Payment/Charge	Clairis	
Exchange User Fees		
	Rate Development & Change -	2B
Plan Level Adjusted Index Rate	Retention Items	26
	Plan Rate Development	3
Age Curve Calibration		
	Rate Development & Change -	2C
Geographic Factor Calibration	Normalized Market-Adjusted	2C
Geographic Factor Calibration Tobacco Use Rating Factor Calibration		2C
<u> </u>	Normalized Market-Adjusted	2C
Tobacco Use Rating Factor Calibration	Normalized Market-Adjusted	2C
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied	Normalized Market-Adjusted	
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans	Normalized Market-Adjusted Projected Allowed Total Claims	4
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans	Normalized Market-Adjusted Projected Allowed Total Claims Plan Premium Development for 21-	
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans Consumer Adjusted Premium Rate Development	Normalized Market-Adjusted Projected Allowed Total Claims Plan Premium Development for 21- Year-Old Non-Tobacco User	4 5A-C
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans	Normalized Market-Adjusted Projected Allowed Total Claims Plan Premium Development for 21- Year-Old Non-Tobacco User Plan Factors	4
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans Consumer Adjusted Premium Rate Development Projected Loss Ratio	Normalized Market-Adjusted Projected Allowed Total Claims Plan Premium Development for 21- Year-Old Non-Tobacco User Plan Factors Rate Development & Change -	4 5A-C
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans Consumer Adjusted Premium Rate Development Projected Loss Ratio AV Metal Values	Normalized Market-Adjusted Projected Allowed Total Claims Plan Premium Development for 21- Year-Old Non-Tobacco User Plan Factors Rate Development & Change - Retention Items	4 5A-C 2B 3
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans Consumer Adjusted Premium Rate Development Projected Loss Ratio	Normalized Market-Adjusted Projected Allowed Total Claims Plan Premium Development for 21- Year-Old Non-Tobacco User Plan Factors Rate Development & Change - Retention Items Plan Rate Development Basic Information and Data -	4 5A-C 2B
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans Consumer Adjusted Premium Rate Development Projected Loss Ratio AV Metal Values Membership Projections	Normalized Market-Adjusted Projected Allowed Total Claims Plan Premium Development for 21- Year-Old Non-Tobacco User Plan Factors Rate Development & Change - Retention Items Plan Rate Development Basic Information and Data - Membership Count	4 5A-C 2B 3 1D
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans Consumer Adjusted Premium Rate Development Projected Loss Ratio AV Metal Values	Normalized Market-Adjusted Projected Allowed Total Claims Plan Premium Development for 21- Year-Old Non-Tobacco User Plan Factors Rate Development & Change - Retention Items Plan Rate Development Basic Information and Data -	4 5A-C 2B 3
Tobacco Use Rating Factor Calibration The Calibration Adjustments are to be applied Uniformly to all plans Consumer Adjusted Premium Rate Development Projected Loss Ratio AV Metal Values Membership Projections	Normalized Market-Adjusted Projected Allowed Total Claims Plan Premium Development for 21- Year-Old Non-Tobacco User Plan Factors Rate Development & Change - Retention Items Plan Rate Development Basic Information and Data - Membership Count Basic Information and Data - Company	4 5A-C 2B 3 1D
	Reason for Rate Increase(s) Paid through Date Current Date Allowed and Incurred Claims Incurred During the Experience Period Benefit Categories Trend Factors (Cost and utilization) Morbidity Adjustment Demographic Shift Plan Design Changes Other Adjustments Source and Appropriateness of Experience Data Used Adjustments Made to the Data Inclusion of Capitation Payments Description of the credibility methodology used Resulting credibility level assigned to the base period experience Establishing the Index Rate Small Group Quarterly Rate Filings Development of the Market-wide Adjusted Index Rate Reinsurance Risk Adjustment Payment/Charge Exchange User Fees Plan Level Adjusted Index Rate	Company Identifying Information Basic Information and Data - Company



Appendix B

Development of Single Risk Pool Adjustment Factors

CHANGES IN DEMOGRAPHICS (GEOGRAPHIC MIX)

Rating Area	2023 Statewide Distribution	2023 Interim GCF	JHP 2025 Projected Membership
Rating Area 1	4.7%	0.925	0%
Rating Area 2	0.4%	1.286	0%
Rating Area 3	8.3%	1.139	0%
Rating Area 4	23.1%	0.844	0%
Rating Area 5	3.9%	1.015	0%
Rating Area 6	7.5%	1.251	100%
Rating Area 7	9.6%	1.338	0%
Rating Area 8	36.7%	0.978	0%
Rating Area 9	5.8%	1.319	0%
Total Statewide Factor		1.035	1.251



Appendix B

Development of Single Risk Pool Adjustment Factors

CHANGES IN DEMOGRAPHICS (MEMBERSHIP MIX)

The allowed claim cost adjustment for demographic shift was calculated using allowed PMPM relativities between the base period and projection periods. We used average allowed PMPM claims by metal and age band from Wakely's proprietary individual ACA database and calculated an effective total allowed PMPM for the base and projection periods using the corresponding metal and age distributions.

While we are unable to share the actual data underlying the proprietary database, we created an exhibit that illustrates our methodology for this adjustment using arbitrary PMPMs.

Change in Demographic Fator

			Allo	red PMPM fro	m Wakely Prop	orietary ACA D	ata			
	Catastrophic	Bronze	Bronze Zero	Bronze Limited	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Gold	Platinum
Age_0_17	\$171.85	\$106.54	\$106.54	\$106.54	\$209.38		\$189.87	\$146.83	\$246.96	\$498.32
Age_18_25	\$150.77	\$100.92	\$100.92	\$100.92	\$257.26	\$16.35	\$179.67	\$165.40	\$244.39	\$440.61
Age_26_34	\$133.30	\$132.63	\$132.63	\$132.63	\$393.53	\$42.91	\$299.28	\$288.22	\$410.22	\$1,122.54
Age_35_44	\$375.25	\$170.16	\$170.16	\$170.16	\$447.09	\$74.07	\$373.60	\$368.97	\$471.66	\$1,147.98
Age 45 54	\$348.01	\$246.25	\$246.25	\$246.25	\$593.10	\$125.49	\$499.21	\$516.97	\$605.62	\$1,330.58
Age_55_64	\$483.82	\$430.15	\$430.15	\$430.15	\$836.22	\$205.14	\$758.08	\$733.10	\$862.51	\$1,665.41
Age GE65	\$422.74	\$482.59	\$482.59	\$482.59	\$1,145.98	\$252.63	\$850.90	\$798.27	\$1,258.43	\$2,403.09

	PA Individual Statewide 2022										
	Catastrophic	Bronze	Bronze Zero	Bronze Limited	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Gold	Platinum	
Metal Mix	0%	24%	0%	0%	7%	5%	15%	14%	35%	0%	
Age_0_17	6%	6%	6%	6%	5%	5%	5%	5%	6%	6%	
Age_18_25	7%	7%	7%	7%	7%	7%		7%	6%	6%	
Age_26_34	17%	17%	17%	17%	16%	16%	16%	16%	14%	14%	
Age_35_44	15%	15%	15%		17%	17%	17%		14%	14%	
Age_45_54	18%	18%	18%	18%	20%	20%				17%	
Age_55_64	35%	35%	35%	35%	34%	34%	34%	34%	41%	41%	
Age GE65	1%	1%	1%	1%	2%	2%	2%	2%	1%	1%	

	PA Individual JHP Projected 2025									
	Catastrophic	Bronze	Bronze Zero	Bronze Limited	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Gold	Platinum
Metal Mix	0%	24%	0%	0%	6%	4%	13%	16%	37%	0%
Age_0_17	0%	7%	0%	0%	6%	6%	6%	6%	7%	0%
Age_18_25	0%	7%	0%	0%	8%	8%	8%	8%	7%	0%
Age_26_34	0%	17%	0%	0%		16%	16%	16%		0%
Age_35_44	0%	16%	0%	0%	18%	18%	18%	18%		0%
Age_45_54	0%	17%	0%	0%	19%	19%	19%	19%		0%
Age_55_64	0%	34%	0%	0%	30%	30%	30%	30%	37%	0%
Age GE65	0%	1%	0%	0%	2%	2%	2%	2%	1%	0%

Adjustment Factors	Base Period PMPM	Projection Period PMPM	Adjustme Factor
Membership Miz Adjustment	\$474.51	\$464.97	0.9
	ф т 11т.01	\$101.01	

	PA Individual Statevide 2022								
Catastrophic	Bronze	Bronze Zero	Bronze Limited	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Gold	Platinum
\$0.05	\$1.58				\$0.40		\$0.99	\$5.33	
\$0.05	\$1.74	\$0.00	\$0.00	\$1.17	\$0.05		\$1.58	\$5.27	\$0.00
\$0.10	\$5.48	\$0.00	\$0.00	\$4.16	\$0.33	\$7.09	\$6.36	\$20.37	\$0.00
\$0.25	\$6.21				\$0.60		\$8.66	\$23.42	
\$0.27	\$10.76				\$1.21		\$14.30	\$36.45	\$0.00
\$0.74	\$36.42	\$0.00	\$0.00	\$18.86	\$3.36	\$38.33	\$34.57	\$124.58	\$0.00
\$0.02	\$1.33	\$0.00	\$0.00	\$1.42	\$0.23	\$2.36	\$2.06	\$5.05	\$0.00

	PA Individual JHP Projected 2025								
Catastrophic	Bronze	Bronze Zero	Bronze Limited	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Gold	Platinum
\$0.00	\$1.84	\$0.00	\$0.00	\$0.78	\$0.40	\$1.54	\$1.43	\$6.51	\$0.00
\$0.00	\$1.74	\$0.00	\$0.00	\$1.28	\$0.05	\$1.93	\$2.13	\$6.44	\$0.00
\$0.00	\$5.49	\$0.00	\$0.00	\$3.88	\$0.27	\$6.36	\$7.37	\$22.93	\$0.00
\$0.00	\$6.64	\$0.00	\$0.00	\$4.95	\$0.51	\$8.93	\$10.60	\$26.36	\$0.00
\$0.00	\$10.20	\$0.00	\$0.00	\$6.93	\$0.92	\$12.59	\$15.67	\$38.32	\$0.00
\$0.00	\$35.48	\$0.00	\$0.00	\$15.38	\$2.37	\$30.10	\$34.99	\$118.23	\$0.00
\$0.00	\$1.33	\$0.00	\$0.00	\$1.50	\$0.21	\$2.40	\$2.71	\$5.31	\$0.00







Appendix B

Development of Single Risk Pool Adjustment Factors

CHANGE IN NETWORK (PROVIDER CONTRACTING)

[REDACTED]

CHANGE IN OTHER (COVID-19 IMPACT)

[REDACTED]



Appendix C

Development of the Projected Risk Adjustment Transfer

[REDACTED]



Appendix D

Development of the 2025 Index Rate

Step	Formula	Description	Statewide PA 2022 URRT
1		Base Period Claims Allowed PMPM, with IBNR, Net of Rx Rebates	\$614.01
2		Allowed Claim Cost and Geographic Adjustment (to JHP Projected Age, Metal, and Risk, in JHP Service Area)	1.259
3		COVID Adjustment	
4a		Average Annual Trend, Medical + Rx	6.6%
4b		Number of Years of Trend	3
4c		Final Trend Adjustment	1.210
5		Provider Contracting	
6	= [1] * [2] * [3] * [4c] * [5]	2025 Allowed Claim Cost PMPM, Gross of State Based Reinsurance	\$957.50
7		2025 State Based Reinsurance Recovery on an Allowed Basis	\$52.68
8	= [6] - [7]	2025 JHP Allowed Claim Cost and Risk Adjustment Transfer and Reinsurance PMPM (Market Adj Index Rate)	
			_
9		2025 Paid Risk Adjustment Transfer PMPM	
10		High Cost Risk Pool Fee	
11	= [9] + [10]	2025 Risk Adjustment Transfer PMPM Post-HCRP	
12		Projection Period AV	
13	= 1 / [12]	Convert Paid to Allowed	
14	= [11] * [13]	2025 Risk Adjustment Component of Allowed Costs	
15	= [8] + [14]	2025 JHP Allowed Claim Cost and Risk Adjustment Transfer and Reinsurance PMPM (Market Adj Index Rate)	
16		Exchange Fee	3.0%
17	= [15] / (1 - [16])	Final Market Adjusted Index Rate	\$891.22



Appendix E

Development of the 2025 Normalization Factors

Age Calibration

	Age	Projected
Age	Curve	Age
0	0.765	0.4%
1	0.765	0.4%
2	0.765	0.4%
·	0.765	0.4%
4	0.765	0.4%
5	0.765	0.4%
- 6	0.765	0.4%
7	0.765	0.4%
8	0.765	0.4%
9	0.765	0.4%
10	0.765	0.4%
11	0.765	0.4% 0.4%
13	0.765	
14	0.765 0.765	0.4% 0.4%
15	0.833	0.4%
16	0.859	0.4%
17	0.885	0.4%
18	0.913	0.9%
13	0.941	0.3%
20	0.970	0.9%
21	1.000	0.9%
22	1.000	0.9%
23	1.000	0.9%
24	1.000	0.9%
25	1.004	0.9%
26	1.024	1.8%
27	1.048	1.8%
28	1.087	1.8%
29	1.119	1.8%
30	1.135	1.8%
31	1.159	1.8%
32	1.183	1.8%
33	1.198	1.8%
34	1.214	1.8%
35	1.222	1.7%
36	1.230	1.7%
37 38	1.238 1.246	1.7%
39	1.240	1.7% 1.7%
40	1.278	1.7%
41	1.302	1.7%
42	1.325	1.7%
43	1.357	1.7%
44	1.397	1.7%
45	1.444	1.8%
46	1.500	1.8%
47	1.563	1.8%
48	1.635	1.8%
49	1.706	1.8%
50	1.786	1.8%
51	1.865	1.8%
52	1.952	1.8%
53	2.040	1.8%
54	2.135	1.8%
55	2.230	3.4%
56	2.333	3.4%
57	2.437	3.4%
58	2.548	3.4%
59 60	2.603	3.4%
61	2.714 2.810	3.4%
62		3.4%
63	2.873 2.952	3.4%
64	3.000	3.4%
65+		1.5%
03*	3.000	1.24





Appendix E

Development of the 2025 Normalization Factors

Tobacco Calibration

	Projected	Tobacco
Age	Age	Factor
Ō	0.4%	1.000
1	0.4%	1.000
2	0.4%	1.000
3	0.4% 0.4%	1.000 1.000
5	0.4%	1.000
6	0.4%	1.000
7	0.4%	1.000
8	0.4%	1.000
9	0.4% 0.4%	1.000 1.000
11	0.4%	1.000
12	0.4%	1.000
13	0.4%	1.000
14	0.4%	1.000
15 16	0.4% 0.4%	1.000 1.000
17	0.4%	1.000
18	0.9%	1.000
19	0.9%	1.000
20 21	0.9% 0.9%	1.000 1.100
22	0.9%	1.100
23	0.9%	1.100
24	0.9%	1.100
25	0.9%	1.100
26 27	1.8%	1.100
28	1.8%	1.100 1.100
29	1.8%	1.100
30	1.8%	1.100
31	1.8%	1.100
32 33	1.8%	1.100 1.100
34	1.8% 1.8%	1.100
35	1.7%	1.100
36	1.7%	1.100
37	1.7%	1.100
38	1.7%	1.100
39 40	1.7%	1.100 1.100
41	1.7%	1.100
42	1.7%	1.100
43	1.7%	1.100
44 45	1.7% 1.8%	1.100
46	1.8%	1.100 1.100
47	1.8%	1.100
48	1.8%	1.100
49	1.8%	1.100
50 51	1.8%	1.100 1.100
52	1.8%	1.100
53	1.8%	1.100
54	1.8%	1.100
55	3.4%	1.100
56 57	3.4% 3.4%	1.100 1.100
58	3.4%	1.100
59	3.4%	1.100
60	3.4%	1.100
61	3.4%	1.100
62 63	3.4%	1.100 1.100
64	3.4% 3.4%	1.100
65+	1.5%	1.100

Component	Value
Tobacco rating factor (for smokers only)	1.090
% of people who can be rated for tobacco	2.6%
Total rate-up based on admitted tobacco usage	1.002



Appendix E

Development of the 2025 Normalization Factors

Geographic Calibration

Rating Area	Geographic Factors
Rating Area 6	1.000
Total, Membership Weighted	1.000

Network Calibration

Network	Network Factor
JHP Network	1.000
Total, Membership Weighted	1.000



Appendix F

Federal Actuarial Values

Plan ID	Federal AV
19702PA0010001	65.0%
19702PA0010002	64.0%
19702PA0010004	70.6%
19702PA0010005	70.0%
19702PA0010006	70.3%
19702PA0010007	79.2%
19702PA0010008	78.0%
19702PA0010009	79.5%
19702PA0010003	63.0%



Appendix G

Induced Utilization Factors

Per PID guidance, the induced demand factors were calculated based on the HHS induced demand formula using the following formula: (Plan AV)^2 – (Plan AV) + 1.24.

The induced demand factors shown below are normalized to JHP's 2025 estimated membership mix by metal, averaging a 1.0 in total, and are applied to the base rate in order to develop member premiums.

Plan ID	Induced Demand Factor	Induced Demand Factor (Normalized)
19702PA0010006	1.157	1.042
19702PA0010005	1.159	1.044
19702PA0010004	1.189	1.071
19702PA0010001	1.033	0.931
19702PA0010002	1.031	0.929
19702PA0010007	1.113	1.002
19702PA0010008	1.098	0.989
19702PA0010009	1.096	0.987
19702PA0010003	1.024	0.923
Total	1.110	1.000



Appendix H

Rate Manual and Rate Formula

<u>Rates Tables / Manual</u> <u>HIOS #19702 - Partners Insurance Company, dba Jefferson Health Plans - Individual</u>

Consumer Plan Adjuste	ed Index Rate
HIOS ID	Factor
19702PA0010001	369.17
19702PA0010002	366.01
19702PA0010003	355.22
19702PA0010004	549.97
19702PA0010005	518.29
19702PA0010006	516.27
19702PA0010007	467.74
19702PA0010008	450.69
19702PA0010009	449.22

	Age Factors	
Age	Age Factor	Tobacco Factor
0-14	0.765	1.000
15	0.833	1.000
16	0.859	1.000
17	0.885	1.000
18	0.913	1.000
19	0.941	1.000
20	0.970	1.000
21	1.000	1.100
22	1.000	1.100
23	1.000	1.100
24	1.000	1.100
25	1.004	1.100
26	1.024	1.100
27	1.048	1.100
28	1.087	1.100
29	1.119	1.100
30	1.135	1.100
31	1.159	1.100
32	1.183	1.100
33	1.198	1.100
34	1.198	1.100
35		
	1.222	1.100
36	1.230	1.100
37	1.238	1.100
38	1.246	1.100
39	1.262	1.100
40	1.278	1.100
1	1.302	1.100
42	1.325	1.100
43	1.357	1.100
44	1.397	1.100
45	1.444	1.100
46	1.500	1.100
47	1.563	1.100
48	1.635	1.100
49	1.706	1.100
50	1.786	1.100
51	1.865	1.100
52	1.952	1.100
53	2.040	1.100
54	2.135	1.100
55 56	2.230	1.100
	2.000	1.100
57	2.437	1.100
58	2.548	1.100
59	2.603	1.100
60	2.714	1.100
61	2.810	1.100
62	2.873	1.100
63	2.952	1.100
64+	3.000	1.100

Area Fact	ors
Area Number	Factor
Rating Area 6	1.000



Appendix H

Rate Manual and Rate Formula

RATE Formula:

CPAIR * Age Factor * Area Factor * Tobacco Factor

Example: 21 year old with plan 19702PA0010001 in Rating Area 6, non-smoker

= 369.1721730 * 1.000 * 1.000000 * 1.00

= \$369.1722

Family Structure – Family rates can be determined by adding up the rates for an individual. However, when calculating the total family rate, the charge is limited to the first three children under the plan.



Appendix I

Projected Reinsurance Impact

Per PID guidance, this filing should reflect rates with the proposed 2025 reinsurance parameters. The final parameters and our calculated impact are below.

Rating Area	Attachment Point	Сар	Coinsurance	Impact to Market Adjusted Index Rate
Rating Area 6	\$60,000	\$100,000	60%	-5.5%

Standard Questions

1. Membership:

a. If the projected membership for plan year 2025 significantly differs from the current 2/1/2024 membership, please explain why.

The JHP PPO product will be new to the market in 2025, and therefore does not have experience.

2. Experience Period Claims:

a. Please confirm that all claims which are capitated have been removed from the experience period claims.

The JHP PPO product will be new to the market in 2025, and therefore does not have experience. Since the manual claims are based on statewide costs across all ACA individual products, we do not know the proportion of costs that were capitated vs fee for service in the base period. We believe that our base period allowed claims should capture all claims data, as reported on Worksheet 1 of the URRT. Excluding these claims would result in an artificially low allowed base rate. This methodology relies on accurate carrier reporting in the URRTs. JHP does not have any capitation contracts in 2025, so we are not adjusting further for capitation payments in the projection period.

b. Please confirm that all non-EHB claims have been removed from the experience period claims.

We confirm that all non-EHB claims have been removed from the manual claims, based on reported data within the URRT.

c. How are drug rebates projected to change from the base period to the rating period? How has this change been reflected in the rate development?

We are assuming that JHP's drug rebates will be equivalent to market levels in 2025. For that reason, no adjustment has been applied to the rate development to account for projected drug rebates.

3. COVID:

a. Please confirm that Tables 2-4 of the PAAM Exhibits do not have any COVID adjustment. Additionally, please confirm that any COVID adjustment factor in the filing is reflected in Table 5 of the PAAM Exhibits.

We confirm there are no COVID adjustments in Tables 2-4 of the PAAM Exhibits. We confirm that the COVID adjustment factor is reflected in Table 5 of the PAAM Exhibits.

b. If there is a COVID adjustment factor other than 1.0, please provide a quantitative exhibit supporting the factor.

[REDACTED]

Please see Appendix B of the Actuarial Memorandum for the COVID-19 adjustment. The factor shown in D21 of Table 5 represents the COVID-19 adjustment factors applied to the base period data.

c. Please provide commentary on how the Company believes services such as COVID vaccinations and COVID testing will be handled in PY25. Within your response, please clarify if these services will be considered preventative and covered at 100%.

JHP will be covering 100% of COVID vaccinations and testing.

4. Trend:

- a. [SG. Only] If the Total Annual Trend in Table 3 (weighted by credibility) and the Annual Trend used to calculate quarterly rates in Table 5A differ, please provide an explanation and exhibit in support of the variation.
- b. [SG. Only] In Table 5A, if cells K32:M32 are left to equal J32, please explain why that is a reasonable assumption.

This question is not applicable as JHP is only filing in the individual market.

5. Table 6 – Retention:

a. Please confirm that the federal income tax is calculated using a Federal Income Tax Rate of 21%. If other adjustments were made in Table 6, cell C57, please provide a demonstration of how this number was calculated and an explanation of the other adjustments included in the calculation.

[REDACTED]

b. Please confirm that the Risk Adjustment User Fee PMPM is consistent with HHS Final Notice of Benefit and Payment Parameters for plan year 2025.

[REDACTED]

c. Please provide an exhibit showing the commission PMPM amount to be paid to brokers in the following situations: Open-Enrollment Enrollee – Renewing, Open Enrollment Enrollee – New, Special Enrollment Period Enrollee – New, Special Enrollment Enrollee – Renewing. If the commission PMPM is not consistent between the four options above, please provide a detailed explanation as to the reason for the difference.

[REDACTED]

6. Pricing AVs:

a. Please confirm that the Pricing AVs were calculated using a single risk pool (i.e., claims/utilization experience is not separated by metal level).

We confirm that the Pricing AVs were calculated using a single risk pool.

 Please identify and support any differences between the company's metallic AV calculator results and the corresponding Pricing AVs. The pricing AVs differ from the Federal AVC outputs primarily because the estimated allowed PMPMs used in developing pricing AVs are different than those underlying the Federal AV calculator. This is due to a leveraging effect for fixed cost sharing elements (e.g. copays, deductibles and MOOPs). The other variance is differences in the methodology of the pricing models and underlying data of the modeling, which ultimately results in varying service category distributions and continuance tables. The pricing AV model also includes more detail in cost-sharing inputs compared to the Federal AVC. Finally, due to mandated factors, we have included a 22% load to silver on exchange plans.

7. Expanded Bronze Plans:

a. Please provide an exhibit which demonstrates that the criteria for expanded bronze plans have been met.

Per our understanding, to qualify as an expanded bronze, a plan must pay for at least one major service before the deductible is met. All three bronze plans that JHP is offering in 2025 offer one free PCP visit before cost sharing begins and cover PCP visits, specialist visits, generic drugs, and preferred brand drugs pre-deductible. Please see the Federal AV screenshots incorporated with this filing for an exhibit of this benefit coverage.

8. PAAM Exhibits – Consumer Factors:

a. Please provide quantitative and qualitative support for the proposed geographic rating area factors, if different from the previous year.

JHP is only filing in one rating area, therefore, the geographic factor is 1.0.

b. Please provide quantitative and qualitative support for the proposed network factors, if different from the previous year.

JHP does not have more than one network, therefore, the network factor is 1.0.

9. MLR Exhibit:

- a. Please complete table below which summarizes the most recent three years of complete MLR information.
 - i. Actual is the final information which was filed for the specified calendar year
 - ii. Projected is the information which was projected in the final annual filing for the given year (i.e., 2021 projected information is from the plan year 2021 annual filing submitted in 2020) MLR Member Months Calendar Year Actual Projected Actual Projected 21 2020 2021 2022

	M	LR	Member	Months
Calendar Year	Actual	Projected	Actual	Projected
2020	N/A	N/A	N/A	N/A
2021	N/A	N/A	N/A	N/A
2022	N/A	N/A	N/A	N/A

- b. Are the MLRs and Member Months between Actual and Pricing comparable? If not, explain.
- c. Does the insurer expect to pay MLR rebates for the 3-year period above?

These questions are not applicable as this JHP entity will be new in the market in 2025.

10. Plan of Withdrawal:

- a. Please confirm that a Plan of Withdrawal has been submitted if any plans are being discontinued.
- b. For further information regarding the Plan of Withdrawal process, click here. Please send all Plan of Withdrawals to Jeff Rohaly, wrohaly@pa.gov.

This question is not applicable as JHP is entering the market in plan year 2025.

11. Transitional Plans:

a. Starting in October 2024, the PID will discontinue the non-enforcement policy for individual transitional plans (the non-enforcement policy for small group transitional plans will continue until further notice, or until the federal government discontinues its non-enforcement policy). If applicable, please discuss the migration of individual transitional members into ACA-compliant plans effective January 1, 2025.

This question is not applicable as JHP has no transitional plans.

12. Copay Adjustment Programs

- a. Does the company use a copay adjustment program (also known as a copay accumulator program)?
- b. How does the company handle copay assistance coupons? For example, does the coupon apply to the MOOP?
- c. If any change to such a program has resulted in a pricing impact, please include a detailed quantitative exhibit supporting the pricing impact.

JHP does not use a copay adjustment program. Assistance coupons do not apply to the MOOP and there is no pricing impact of this program.

PA Rate Template Part I Data Relevant to the Rate Filing

Table 0. Identifying Information

Carrier Name:	Partners Insurance Company, dba J	fferson Health Plans	
Product(s):	PPO		
Market Segment:	Individual		
Rate Effective Date:	1/1/2025	to	12/31/2025
Base Period Start Date:	1/1/2023	to	12/31/2023
Date of Most Recort Mombarthia	2/1/2024		

Table 1. Number of Members

	Member-months	Members	Member-months
	Experience Period	Current Period (as of 02-01-2024)	Projected Rating Period
Average Age			49.9
Total	0	0	6,000
<18			405
18-24			395
25-29			484
30-34			534
35-39			497
40-44			497
45-49			538
50-54			538
55-59			1,011
60-63			809

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-EHB portion of Allowed Claims	Total Prescription Drug Rebates*	Total EHB Capitation	Total Non-EHB Capitation	Estimated Risk Adjustment	Estimated Reinsurance Recoveries
Experience Period Total Allowed Et	HB Claims + EHB Capitation PMPM (r	et of prescription drug rebates)			•				-		s -
Lord Patio											0.00%

Table 3. Trend Components

Service Category	Cost*	Utilization*	Induced Demand*	Composite Trend	Weight*
inpatient Hospital				0.00%	
Dutpatient Hospital				0.00%	
Professional				0.00%	
Other Medical				0.00%	
Capitation					
Prescription Drugs				0.00%	
Fotal Annual Trend				0.00%	0.00%
Months of Trend				24	
Total Applied Trend Projection Factor				1.000	
* Express Cost, Utilization, Induced Utilization and Weight as pe	vcentages	***************************************			
** Should equal URRT Trend					

Table 4. Historical Experience

Month-Year	Total Annual Premium	Incurred Claims	Completion Factors*	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-20				#DIV/01		#DIV/01				#DIV/01
Feb-20				#DIV/01		#DIV/01				#DIV/01
Mar-20				#D(V/01		#DIV/01				#DIV/01
Apr-20				#DIV/01		#DIV/01				#DIV/01
May-20				#DIV/01		#DIV/01				#DIV/01
Jun-20				#D(V/01		#DIV/01				#DIV/01
Jul-20				#DIV/01		#DIV/01				#DIV/01
Aug-20				#DIV/01		#DIV/01				#DIV/01
Sep-20				#DIV/01		#DIV/01				#DIV/01
Oct-20				#D(V/01		#D(V/01				#DIV/01
Nov-20				#D(V/01		#DIV/01				#DIV/01
Dec-20				#DIV/01		#DIV/01				#DIV/01
Jan-21				#DIV/01		#DIV/01				#DIV/01
Feb-21				#DIV/01		#DIV/01	•			#DIV/01
				#DIV/01		#DIV/01	-			#DIV/01
Mar-21										
Apr-21				#DIV/01 #DIV/01		#DIV/01 #DIV/01				#DIV/01
May-21										
Jun-21				#DIV/01		#DIV/01				#DIV/01
Jul-21				#DIV/01		#DIV/01				#DIV/01
Aug-21				#DIV/01		#DIV/01				#DIV/01
Sep-21				#D(V/01		#DIV/01				#DIV/01
Oct-21				#DIV/01		#DIV/01				#DIV/01
Nov-21				#DIV/01		#DIV/01				#DIV/01
Dec-21				#DIV/01		#DIV/01				#DIV/01
Jan-22				#DIV/01		#DIV/01				#DIV/01
Feb-22				#DIV/DI		#DIV/01				#DIV/01
Mar-22				#D(V/01		#DIV/01				#DIV/01
Apr-22				#DIV/01		#DIV/01				#DIV/01
May-22				#D(V/01		#DIV/01				#DIV/01
Jun-22				#DIV/01		#DIV/01				#DIV/01
Jul-22				#D(V/01		#D(V/01				#DIV/01
Aug-22				#DIV/01		#DIV/01				#DIV/01
Sep-22				#DIV/01		#DIV/01				#DIV/01
Oct-22				#D(V/01		#DIV/01				#DIV/01
Nov-22				#D(V/01		#D(V/01				#DIV/01
Dec-22				#DIV/01		#DIV/01				#DIV/01
Jan-23				#DIV/01		#DIV/01				#DIV/01
Feb-23				#DIV/01		#DIV/01				#DIV/01
Heb-23 Mar-23				#DIV/01		#DIV/01				#DIV/01
						#DIV/01				#DIV/01
Apr-23 May-23				#DIV/01 #DIV/01		#DIV/01 #DIV/01				#DIV/01
Jun-23				#DIV/01		#DIV/01				#DIV/01
Jul-23				#D(V/01		#DIV/01				#DIV/01
Aug-23				#DIV/01		#DIV/01				#DIV/01
Sep-23				#DIV/01		#DIV/01				#DIV/01
Oct-23				#DIV/01		#DIV/01				#DIV/01
Nov-23				#DIV/01		#DIV/01				#DIV/01
Dec-23				#DIV/DI		#DIV/01				#DIV/01

Carrier Name: Partners Insurance Company, dba Jefferson Health Plans
Product(d): PPO
Market Segment: Individual
Rate Effective Date: 1/1/2025

Table 2b. Manual Experience Period Claims and Premiums

Earned Premium	Paid Claims	Ultimate Incurred Claims	Member Months	Estimated Cost Sharing (Member & HHS)	Allowed Claims (Non-Capitated)	Non-EHB portion of Allowed Claims	Total Prescription Drug Rebates*	Total EHB Capitation	Total Non-EHB Capitation	Estimated Risk Adjustment	Estimated Reinsurance Recoveries	
\$ 3,034,494,792.17	\$ 2,902,383,347.85	\$ 2,902,383,347.85	5,119,795	\$ 490,804,770.48	\$ 3,393,188,118.33	\$ 9,088,398.90	\$ (240,492,810.71)	S -	s .	s -	\$ 156,625,510.72	
Experience Period Total Allowed EH	perience Pariod Total Allowed EHB Claims + EHB Capitation PMPM (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	7.39%	0.00%		7.39%	18.34%
Outpatient Hospital	4.70%	2.60%		7.42%	29.93%
Professional	6.73%	2.85%		9.77%	30.45%
Other Medical	6.73%	2.85%		9.77%	0.00%
Capitation				0.00%	0.00%
Prescription Drugs	13.19%	2.45%		15.96%	21.28%
Total Annual Trend				10.00%	100.00%
Months of Trend				24	
Total Applied Trend Benjerting Earter				4.240	

Table 4b. Historical Manual Experience

Month-Year	Total Annual Premium	Incurred Claims	Completion Factors*	Ultimate Incurred Claims	Members	Ultimate Incurred PMPM	Estimated Annual Cost Sharing (Member + HHS)	Prescription Drug Rebates**	Allowed Claims (Net of Prescription Drug Rebates)	Allowed PMPN
Jan-20				#DIV/01		#DIV/01				#DIV/01
Feb-20				#DIV/0I		#DIV/01				#DIV/01
Mar-20				#DIV/0I		#DIV/01				#DIV/01
Apr-20				#DIV/0I		#DIV/DI				#DIV/01
May-20				#DIV/0I		#DIV/DI				#DIV/01
Jun-20				#DIV/0I		#DIV/DI				#DIV/01
Jul-20				#D(V/01		#D(V/01				#DIV/01
Aug-20				#DIV/01		#D(V/01				#DIV/01
Sep-20				#D(V/01		#D(V/D1				#DIV/01
Oct-20				#D(V/01		#D(V/D1				#DIV/01
Nov-20				#D(V/0!		#D(V/D)				#DIV/01
Dec-20				#DIV/01		#D(V/D1				#DIV/01
Jan-21				#D(V/01		#D(V/D1				#DIV/01
Feb-21				#DIV/01		#D(V/01				#DIV/01
Mar-21				#DIV/01		#DIV/01				#DIV/01
Apr-21				#DIV/01		#DIV/01				#DIV/01
May-21				#DIV/01		#DIV/01				#DIV/01
Jun-21				#DIV/01		#DIV/01				#DIV/01
301-21				#DIV/01		#D(V/01				#DIV/01
Aug-21				#DIV/01		#DIV/01				#DIV/01
Sep-21										#DIV/01
Sep-21 Oct-21				#DIV/01		#D(V/01 #D(V/01				#DIV/01
							-			
Nov-21 Dec-21				#DIV/01		#DIV/01				#DIV/01
		\$ 208.168.609.20		#DIV/01	426.650	#DIV/01 S 487.91		\$ (20,041,067.61)	\$ 261,965,177.57	#DIV/01
Jan-22		S 208,168,609.20 S 208.168,609.20	1.0000		426,650 426,650					
Feb-22 Mar-22		S 208.168.609.20 S 208.168.609.20	1.0000		426.650 426.650			S (20.041.067.61) S (20.041.067.61)		
Apr-22		\$ 208,168,609.20	1.0000		426,650			\$ (20,041,067.61)		
May-22		\$ 208,168,609,20	1.0000		426,650			S (20.041.067.61)		
Jun-22		\$ 208,168,609.20	1.0000		426,650			\$ (20,041,067.61)		
Jul-22		S 208.168.609.20	1.0000		426.650			S (20.041.067.61)		
Aug-22		\$ 208,168,609.20	1.0000		426,650			\$ (20,041,067.61)		
Sep-22		\$ 208,168,609.20	1.0000		426,650			\$ (20,041,067.61)		
Oct-22		\$ 208,168,609,20	1.0000		426,650			S (20.041.067.61)		
Nov-22		\$ 208,168,609.20	1.0000		426,650			\$ (20,041,067.61)		
Dec-22	\$ 3,034,494,792.78	\$ 208,168,609.20	1.0000		426,650		\$ 645,558,820.48	\$ (20,041,067.61)	\$ 261,965,177.57	
Jan-23				#DIV/0!		#DIV/DI				#DIV/0
Feb-23				#DIV/01		#D(V/01				#DIV/01
Mar-23				#DIV/0!		#DIV/DI				#DIV/01
Apr-23				#DIV/01		#DIV/01				#DIV/01
May-23				#DIV/0!		#DIV/DI				#DIV/01
Jun-23				#DIV/0I		#DIV/OI				#DIV/01
Jul-23				#DIV/0I		#DIV/DI				#DIV/01
Aug-23				#D(V/01		#D(V/D1				#DIV/01
Sep-23				#DIV/01		#D(V/01				#DIV/01
Oct-23				#D(V/0!		#DIV/01				#DIV/01
Nov-23				#D(V/01		#D(V/D1				#DIV/01
Dec-23				#D(V/01		#D(V/D1				#DIV/01

* Express Completion Factor as a percentage **Express Prescription Drug Rebates as a negative number

Continuance Table for Calculating Reinsurance Impact - Individual Market Only, Experience Period Information

Partners Insurance Company, dba Jefferson Health Plans Carrier Name:

PATTNERS INSURANCE COMPA PPO Individual 1/1/2025 1/1/2023 to 12/31/2023 Product(s):
Market Segment:
Rate Effective Date: Incurred Dates:

Attachment Point: Reinsurance Cap: Coinsurance Rate:

\$60,000 \$100,000 60%

Proj. Incurred Claim Impact: 0.0%

		Individual ACA Compliant Policies			Total Incurred Claims with
Annual Incurre	d Claims Range	Unique Members	Member Months	Total Incurred Claims	Reinsurance
\$0	\$29,999				\$0
\$30,000	\$34,999				\$0
\$35,000	\$39,999				\$0
\$40,000	\$44,999				\$0
\$45,000	\$49,999				\$0
\$50,000	\$54,999				\$0
\$55,000	\$59,999				\$0
\$60,000	\$64,999				\$0
\$65,000	\$69,999				\$0
\$70,000	\$74,999				\$0
\$75,000	\$79,999				\$0
\$80,000	\$84,999				\$0
\$85,000	\$89,999				\$0
\$90,000	\$94,999				\$0
\$95,000	\$99,999				\$0
\$100,000	\$109,999				\$0
\$110,000	\$119,999				\$0
\$120,000	\$119,999				\$0
\$130,000	\$139,999				\$0
\$140,000	\$139,999				\$0
\$150,000	\$159,999				\$0
\$160,000	\$169,999				\$0
\$160,000	\$169,999 \$179,999				\$0 \$0
\$180,000	\$189,999				\$0
\$190,000	\$199,999				\$0 \$0
\$200,000	\$209,999				
\$210,000	\$219,999				\$0
\$220,000	\$229,999				\$0
\$230,000	\$239,999				\$0
\$240,000	\$249,999				\$0
\$250,000	\$259,999				\$0
\$260,000	\$269,999				\$0
\$270,000	\$279,999				\$0
\$280,000	\$289,999				\$0
\$290,000	\$299,999				\$0
\$300,000	\$324,999				\$0
\$325,000	\$349,999				\$0
\$350,000	\$374,999				\$0
\$375,000	\$399,999				\$0
\$400,000	\$424,999				\$0
\$425,000	\$449,999				\$0
\$450,000	\$474,999				\$0
\$475,000	\$499,999				\$0
\$500,000	\$599,999				\$0
\$600,000	\$699,999				\$0
\$700,000	\$799,999				\$0
\$800,000	\$899,999				\$0
\$900,000	\$999,999				\$0
\$1,000,000+					\$0
Total		0	0	\$0	\$0

Continuance Table for Calculating Reinsurance Impact - Individual Market Only, Projection Period Information

Carrier Name: Partners Insurance Company, dba Jefferson Health Plans Attachment Point: \$60,000
Product(s): PPO Reinsurance Cap: \$100,000
Market Segment: Individual Coinsurance Rate: 60%
Rate Effective Date: 1/1/2025

 Proj. Incurred Claim Impact:
 -5.5%

 Proj. Morbidity Impact:
 0.0%

		Reinsurance Program Impact Cont	tinuance Table Development - Pla	n Year 2025	
		nemourance rogram impact cont			Total Incurred Claims with
Annual Incurre	ed Claims Range	Unique Members	Member Months	Total Incurred Claims	Reinsurance
\$0	\$29,999				\$11,538,732,796
\$30,000	\$34,999				\$943,999,109
\$35,000	\$39,999				\$855,696,538
\$40,000	\$44,999				\$793,168,670
\$45,000	\$49,999				\$745,509,387
\$50,000	\$54,999				\$730,016,274
\$55,000	\$59,999				\$666,745,598
\$60,000	\$64,999				\$599,616,788
\$65,000	\$69,999				\$519,817,801
\$70,000	\$74,999				\$447,880,236
\$75,000	\$79,999				\$415,571,535
\$80,000	\$84,999				\$379,394,369
\$85,000	\$89,999				\$358,118,475
\$90,000	\$94,999				\$328,567,547
\$95,000	\$99,999				\$301,225,455
\$100,000	\$109,999				\$552,941,500
\$110,000	\$119,999				\$478,905,088
\$120,000	\$129,999				\$448,058,236
\$130,000	\$139,999				\$394,872,848
\$140,000	\$149,999				\$376,850,729
\$150,000	\$159,999				\$332,808,847
\$160,000					
\$170,000	\$169,999 \$179,999				\$316,149,354 \$301,210,838
	· ' '				
\$180,000	\$189,999				\$293,589,418
\$190,000	\$199,999				\$288,904,860
\$200,000	\$209,999				\$256,679,915
\$210,000	\$219,999				\$254,842,275
\$220,000	\$229,999				\$239,561,779
\$230,000	\$239,999				\$231,646,154
\$240,000	\$249,999				\$209,930,726
\$250,000	\$259,999				\$197,252,438
\$260,000	\$269,999				\$199,785,751
\$270,000	\$279,999				\$196,528,762
\$280,000	\$289,999				\$173,377,035
\$290,000	\$299,999				\$147,315,519
\$300,000	\$324,999				\$393,170,972
\$325,000	\$349,999				\$321,854,758
\$350,000	\$374,999				\$279,619,927
\$375,000	\$399,999				\$261,536,935
\$400,000	\$424,999				\$251,163,095
\$425,000	\$449,999				\$217,028,943
\$450,000	\$474,999				\$212,208,990
\$475,000	\$499,999				\$187,318,782
\$500,000	\$599,999				\$552,171,933
\$600,000	\$699,999				\$388,173,853
\$700,000	\$799,999				\$274,115,537
\$800,000	\$899,999				\$202,149,472
\$900,000	\$999,999				\$201,910,739
\$1,000,000+					\$948,743,574
Total		5,911,650	53,725,365	\$31,965,118,469	\$30,206,440,160

Partners Insurance Company, dba Jefferson Health Plans 990 Individual 1/1/2025

Development of the Projected Index Rate	A	tual Experience Data	Manual Data	
Total Allowed DHB Claims + DHB Capitation PMPM Inet of prescription drug rebates) PMPM	5		\$ 614.01	<- Actual Experience PMPM sho
Two year trend projection Factor		1.000	1.210	1
Unadjusted Projected Allowed EHB Claims PMPM	5		\$ 742.90	1
Single Risk Pool Adjustment Factors				
Change in Morbidity - Impact of Reinsurance Program		1.000	1.000	1
Change in Morbidity - All Other			1.000	 See URRT Instructions
Total Non-Morbidity Changes		0.000	1.289	1
Change in Demographics			1.259	 See URRT Instructions
Change in Natural				1
Change in Separation			1.000	 See URRT Instructions
Change in Other				c. See 1997 Instructions
Class II Com				V and Great Handelson
Total Adjusted Projected Allowed DHB Claims PMPM	2		\$ 957.50	
Credibility Factors		0%	100%	<- See Instructions
Blended Projected EHB Claims PMPM			\$ 957.50	 Projected Index Rate
Development of the Market-Adjusted Index Rate and Total Allowed Claims				
Adjusted Projected Allowed EHB Claims PMPM	5	957.50	<- Index Rate for Proje	ction Period on URRT
Projected Paid to Allowed Ratio		0.840		
Projected incurred EHB Claims PMPM	s	804.35	l	
Market-wide Adjustments				
Projected Incurred Risk Adjustment PMPM	5	33.60		
Projected Incurred Exchange User Fees PMPM		\$22.18		
Projected Incurred Reinsurance Recoveries PMPM		\$44.25		
Market-Adjusted Projected Incurred EHB Claims PMPM	s	748.68		
Market-Adjusted Projected Allowed DHII Claims PMPM	s	891.22	<- Market-Adjusted In	dex Rate
Projected Allowed Non-DNS Claims PMPM	s			
Catastrophic Eligibility Adjustment		1.000		
Market-Adjusted Projected Incurred Total Claims PMPM		748.6756213		
Market-Adjusted Projected Allowed Total Claims PMPM	5	891.22		

Blended Base Period Unadjusted Claims before Normalization	В	\$ 614.01	Index Rate of Experience Period on UR
Blended Earned Premium	ŀ	\$ 3.024.494.792.17	
Blended Loss Ratio	Ш	82.56%	

Effective Date	1/1/2025		4/1/2025		7/1/2025		10/1/2025	Total Single Risk Poo	
# of Member Months Renewing in Quarter								П	
Adjusted Projected Allowed EHB Claims PMPM	5	957.50	\$ 957.50	5	957.50	5	957.50	s	957.50
Months of Trend			3		6		9		
Annual Trend		10.00%	10.00%		10.00%		10.00%		
Single Risk Pool Projected Allowed Claims	5	957.50	\$ 980.58	5	1,004.21	\$	1,028.42	5	
Quarterly Trend Factor		1.000	1.024		1.049		1.074		0.000

Retention Items - Express in percentages	Percentages	PMPM Amounts
Administrative Expenses	7.05%	\$58.13
General and Claims	4.05%	\$33.43
Agent/Broker Fees and Commissions	1.84%	\$15.19
Quality Improvement Initiatives	0.80%	\$6.60
Taxes and Fees	2.08%	\$17.15
Risk Adjustment User Fee	0.02%	\$0.18
PCORI Fee	0.03%	\$0.28
PA Premium & Other Taxes (if applicable)	2.00%	\$16.49
Federal Income Tax	0.02%	\$0.17
Health Insurance Providers Fee (Prorated for Small Groups only)	0.00%	\$0.00
Profit/Contingency (after tax)	0.08%	\$0.66
Total Retention	9.21%	\$75.94
Projected Required Revenue PMPM	5 824.61	

Normalization Factors	2024		2025
Average Age Factor			1.77
Average Geographic Factor			1.00
Average Tobacco Factor			1.00
Average Senefit Richness (induced demand)			1.00
Average Network Factor			1.00
Market-Adjusted Projected Allowed Total Claims PMPM		s	891.22
Normalized Market-Adjusted Projected Allowed Total Claims PMPM	MORV/DI	s	500.90

Table 8. Components of Rate Change

Rate Components	2024	2025	Difference	Percent Change
A. Calibrated Plan Adjusted Index Rate (PMPM)	#DIV/01	#DIV/01	#D/V/01	WDFV/C
Base period allowed claims before normalization		\$ 614.01	\$ 614.01	MOTV/O
C. Normalization factor component of change	#DN/01	\$ (268.88)	#DIV/01	MOTV/O
D. Change in Normalized Allowed Claims Adjustment Components				
D1. Base period allowed claims after normalization	#DIV/01		#DIV/01	MOTV/C
D2. URRT Trend	#DN/01	\$ 72.45	#DIV/01	WORV/C
D3. URRT Morbidity	#DIV/01	s -	#DIV/01	MOTV/C
DA. LIRRT Other	#DIV/01	\$ 120.62	#DIV/01	MOTV/C
DS. Normalized URRT Risk Adjustment on an allowed basis	#DIV/01	\$ (22.48)	#DIV/01	MOTV/C
DG. Normalized Exchange User Fee on an allowed basis	#DIV/01	\$ 14.84	#DIV/01	MOTV/C
D7. Normalized Reinsurance Recoveries on an allowed basis	#DIV/01	\$ (29.61)	#DIV/01	MOTV/C
DB. Subtotal - Sum(D1:07)	#DIV/01	\$ 500.96	#DIV/01	MOTV/C
E. Change in Allowable Plan Adjusted Level Components				
E1. Network	#DIV/01	s -	#DIV/01	#DIV/0
E2. Pricing AV	#DIV/01	\$ (90.95)	#DIV/01	MOTV/C
E3. Benefit Richness	#DIV/01	\$ (3.82)	#DIV/01	MOTV/C
E4. Catastrophic Eligibility	#DIV/01	\$ -	#DIV/01	MOTV/C
ES. Benefits in Addition to EHB	#DIV/01	s -	#DIV/01	MOTV/C
E6. Subtotal - Sum(E1:E5)	#DIV/01	\$ (94.77)	#DIV/01	MOTV/C
F. Change in Retention Components				
F1. Administrative Expenses	#DIV/01	#DIV/01	#DIV/01	#DIV/0
F2. Taxes and Fees	#DIV/01	#DIV/01	#DIV/01	MOTV/C
F3. Profit and/or Contingency	#DIV/01	#DIV/01	#DIV/01	MOTV/C
F4. Subtotal - Sum(F1:F3)	#DIV/01	#DIV/01	#DIV/01	MOTV/O
G. Change in Miscellaneous Items			s -	WOIV/C
				MDIV/O
H. Sum of Components of Rate Change (should approximate the change shown in line A)	#DIV/01	MDIV/DI	MDIV/DI	#DIV/

	2024	2025	1
wid-to-Allowed		0.840	
IRRT Trend (Total Applied Trend Factor)		1.210	o UBRT W1. S2
RRT Morbidity		1.000	○ UBRT W1. S2
RT "Other"		1.289	- URRT W1 S2
sk Adjustment		5 (33,60)	o URRTW1. SI
change User Fee		\$ 22.18	o urat wil sa
insurance Recoveries		\$ 44.25	o urat w1, sa
pitation		s -	unatwi, sz
twork		1.000	
cing AV		0.818	For 2024 in cell IB1, please include a factor equal to the product of the average Pricing AV and the Non-Funding of CSR Ad
nefit Richness		0.991	
tastrophic Eligibility		1.000	
mefits in Addition to EHB		1.000	
Sministrative Expenses		7.05%	
swes and Fees		2.08%	
rofit and/or Contineency		0.08%	

PA Rate Template Part III Table 10. Plan Rates

Calibration Total Covered Lives ⊕ 02-01-2024

Age Calibration Factor 1.775

Carrier Name: Product(s): Market Seament: Rate Effective Dat Base Period Start Date of Most Rec Market Adjusted I	oe: Date ent Membership:	Partners Insurance Compa 990 Individual 1/1/2025 1/1/2023 2/1/2024 \$ 891.22	iny, dha Jefferson Health Plans										45	S CFR Part 156.8	i (d) (2) Allowa		Tobacco Calibr	alibration Factor aribration Factor intion Factor libration Factor	1,775 1,000 1,002 1,779		-						02-01-20	324 Number of Cov	ered Lives by Rating	Į Ārea			
Plan Number	HIOS Plan ID (Standard Component)	Product Type (HMO, POS, PPO, EPO, Indemnity, Other)	1/1/2024 Plan Marketing Name	Existing, Modified, New, Discontinued & Mapped, Discontinued & Not Mapped (E,M,N,DM DNM) for 2025	### 1/1/2025 HIOS Plan ID of ()f 1/1/2024 Plan A, Discontinued ####################################		Actuarial	Standard AV, Approach (1), Approach (2)	On/Off or	Pricing AV (company- determined AV)	Benefit Richness (Induced demand)	SeneSts in addition to EHB	Provider Network	Catastrophic Eligibility	Non-Funding of CSR Adjustment	Pure Premium	Admin Costs	Taxes & Fees (not including Exchange fees)	Profit or Contingency	Total Covered Lives Mapped into 2021 Plans @ 02-01- 2024	Total Projected Uves	Plan Adjusted Calib Index Rate Adju	usted Index	Proposed Rate Change Compared o Prior 12 months	% of Total Covered Lives	1 2	, ,		6 7	. ,		2025 Continued/ Discontinued Plans De Indicator	e Minimis Check
Totals - Current Me Total - Projected M							0.710			0.818	0.991	1.000	1.000	1.000	1.073		7.0%	2.1%	0.1% 0.1%	0	500	#DIV/01 #	#DIV/01	10/1/01									
Transitional Plans	TRANSITIONAL		TRANSITIONAL	DNM	TRANSITIONAL	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	-		N/A N/A		N/A	N/A						4	0	
Fian 1	19702PA0010006	PPO	Jefferson Health Plans + Total + Silver + PPO	N		Shorr	0.7029	Approach 1	On/Off	0.745	1.042	1,000	1,000	1,000	1,220	\$841.64	6.0%	2.1%	0.1%		65	s s	516.29	0.0%	#DIV/OI							1 273	
Plan 2	19702PA0010005	PPO	Jefferson Health Plans + Balanced + Silver + PPO	N		Silver	0.7	Approach 1	On/Off	0.747	1.044	1.000	1.000	1.000	1.220	\$847.17	6.0%	2.1%	0.1%		65	s - s	518.28	0.0%	#DIV/OI							1 1	
Plan 3	19702PA0010004	PPO	Jefferson Health Plans + \$0 Deductible + Silver + PPO	N		Silver	0.7055	Approach 1	On/Off	0.775	1.071	1.000	1.000	1.000	1.220	\$902.31	5.6%	2.1%	0.1%		65		549.98	0.0%	#DIV/OI							1 yes	
Plan 4	19702PA0010001	PPO	Jefferson Health Plans + \$0 Deductible + Bronze + PPO	N		Expanded Bro	0.6499	Standard AV	On/Off	0.708	0.931	1.000	1.000	1.000	1,000	\$587.60	1.4%	2.1%	0.1%		40	s - s	169.17	0.0%	#DIV/OI							1 100	
Plan 5	19702PA0010002		Jefferson Health Plans + Total + Bronze			Demanded Stre		Standard AV	01/06	0.701	0.929	1.000	1.000	1.000	1.000	\$582.09		2.1%	0.1%		40		166.01	0.0%	#DIV/OI								
Plan 6	19702PA0010007	PPO	Jefferson Health Plans + \$0 Deductible + Gold + PPO	N		Gold	0.7919	Approach 1	On/Off	0.850	1.002	1.000	1,000	1.000	1,000	\$759.17		2.1%	0.1%		62		467.75	0.0%	#DIV/OI							1 100	
Plan 7	19702940010008	200	Jefferson Health Plans + Total + Gold + PPO			Cold	0.7801	Approach 1	01/06	0.828	0.000	1.000	1,000	1,000	1.000	\$729.49		2.1%	0.1%		62		450.70	0.0%	#DIV/OI								
Plan B	19702PA0010009	PPO	Jefferson Health Plans + Value + Gold + PPO	N		Gold		Approach 1	On/Off	0.826	0.987	1.000	1,000	1,000	1,000	\$726.93		2.1%	0.1%		62	s . s	449.22	0.0%	#DIV/OI							1 175	
Plan 9	19702PA0010003	PPO	Jefferson Health Plans + Value + Bronze + PPO	N N		Expanded Bro	0.6296	Standard AV	On/Off	0.685	0.921	1.000	1,000	1.000	1,000	\$563.32		2.1%	0.1%		40	s - s	355.22	0.0%	#DIV/01							1 100	
Plan 10																\$0.00 \$0.00				-		5	-	0.0%	MDIV/01							0	
Plan 11									_							\$0.00						5	-	0.0%	MDIV/OI				-		4-4	0	
Plan 12 Plan 13				_		_			_	_						\$0.00				_		5		0.0%	MORY/OI MORY/OI		_	_	-	_	_	0	_
Plan 14																\$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00						5		0.0%	MDIV/OI			-	-			0	_
Plan 15																\$0.00				-		5	-	0.0%	MDIV/01							0	
Plan 16																\$0.00				-		5	-	0.0%	MDIV/01						_	0	
Plan 17																\$0.00				-		5	-	0.0%	MDIV/OI			_	-			0	
Plan 18 Plan 19									_							\$0.00				-		5	-	0.0%	MDFV/01 MDFV/01			_	-			0	_
Plan 20																\$0.00 \$0.00 \$0.00 \$0.00						- 5	-	0.0%	MDTV/OI			_	-			0	
Plan 21																\$0.00						s s	-	0.0%	MDIV/OI			_				0	
Plan 22																\$0.00				-		5	-	0.0%	MDIV/01							0	
Plan 23																\$0.00 \$0.00 \$0.00						5		0.0%	MDIV/01							0	
Plan 24																\$0.00				-		5	-	0.0%	MDFV/01			_	-	_		0	
Plan 25 Plan 26																\$0.00				-		5	-	0.0%	MDFV/01 MDFV/01			_	-			0	_
Plan Ju																\$0.00				-		5		0.0%	MDIV/OI MDIV/OI			_	-		4	0	_
Plan 25																\$0.00 \$0.00						- 5	-	0.0%	MDIV/OI			_	-			0	
Plan 29																\$0.00						5	-	0.0%	MDIV/OI			_				0	
Plan 30																\$0.00				-		5	-	0.0%	MDIV/01							0	
			•						_					_		72.00	_								-								_

PA Rate Template Part IV A - Individual Table 11. Plan Premium Development for 21-Year-Old Non-Tobacco User

Partners Insurance Company, dba Jefferson Health Plans PPO Individual 1/1/2025

Carrier Name: Product(s): Market Segment: Rate Effective Date:

Component Component These cells auto-fill using the data entered in Table 10. Component These cells auto-fill using the data entered in Table 10. Component Co	Change in 21-year-old Non 2 3 4 5 0.0% 0.0% 0.0% 0.0% 0.0%
	0.0% 0.0% 0.0% 0.0%
Plan 1 19702PA0010006 Health Plans+Total+SI N 0 Silver On/Off S - S - S - S - S - S - S - S - S - S	
Plan 2 19702PA0010005 ealth Plans + Balakned + N 0 Silver On/Off S - S - S - S - S - S - S - S - S - S	
Plan 3 19702PA0010004 Mth Plans + 50 Deductible N 0 Silver On/Off S - S - S - S - S - S - S - S - S - S	
Plan 4 19700PA0010001 th Plans + 50 Deductible N 0 ganded larm On/Off S - S - S - S - S - S - S - S - S - S	
Plan 5 19702PA0010002 Health Plans + Total + Brg N 0 panded Braf On Off S - S - S - S - S - S - S - S - S - S	
Plan 6 19702PA0010007 htth Plans +50 Deductible N 0 Gold On/Off S - S - S - S - S - S - S - S - S - S	
Plan 7 139702PA00210008 Health Plans + Total + G N 0 Gold On/Off S - S - S - S - S - S - S - S - S - S	
Plan 8 19702PA0010009 Health Plans + Value + G N 0 Gold On/Off 5 - S - S - S - S - S - S - S - S - S -	
Plun 9 15702PA0010003 Health Pluns - Value + Bir N 0 ganded Brow On/OHT 5 - 5 - 5 - 5 - 5 - 5 - 5 - 5 - 5 - 5	
Plan 10 0 0 0 0 0 0 S - S - S - S - S - S - S	
Plan 11 0 0 0 0 0 0 5 5 5 5 5 5 5 5 5 5 5 5	
Plan 12 0 0 0 0 0 0 \$ - \$ - \$ - \$ - \$ - \$ - \$ -	
Plan 13 0 0 0 0 0 0 5 5 5 5 5 5 5 5 5 5 5 5 5	
Pin14 0 0 0 0 0 0 S S S S S S S S S S S S S	
Plan 15 0 0 0 0 0 0 S - S - S - S - S - S - S -	
Plan 16 0 0 0 0 0 0 S - S - S - S - S - S - S -	

cco Pre	mium PMP	м																																													
6	7	8	9	Average (weighted by enrollment by rating area)		Clarion	Crawford	Erie	Fores	: McK	ean M	ercer	Venango	Warren	1	Camero	ı Elk	Pot	ter	2 Br	radford	Carbon	Clinton	Lackaw	anna Lu	ızerne Ly	coming	Monroe	Pike	Sullivan	Susqueh	anna 1	Tioga	Wayne	Wyoming	; 3	Allegher	Armstr	ong B	taver I	Butler	Fayette	Green	e India	na Law	rence 1	w
0.0%	0.0%	0.0%	0.0%	#DIV/0!		n			n	n	0	٥	0		Match	1	1	٥	0 Mat	ch	٥	0		٥	0	0	0	0	0		ıl	0	n	0		Match		n	n	0	٥	0		٥	0	0	
					_																																		-								_
															Match				Mat	ch																Match											
															Match				Mat	ch																Match											
										-	_	_			WIGCCII			_	Iwau	LII					_							_				WIGULII			_					_	_		П
-					-	-			-	+	-	-		_	Match		-	-	Mat	ch	-			-	-	-	-				-	-	-		_	Match		-	-	_	_			-	-	-	Н
															Match				Mat	ch																Match											L
															Match				Mat	ch																Match											
															Match				Mat	ch																Match											Г
										Т	T	T			Match				Mat						T											Match			T						T	T	Г
1					ŀ						_														_							_							+						_	_	ı
+					-					+	-	-			Match			+	Mat	ch				+	-		-					-				Match			+					+	-	-	
					L					1					Match				Mat																	Match											L
															Match Match				Mat Mat	ch																Match Match											
-					-				-	+	-	-			Match Match			+	Mat Mat	ch ch	-			-	-	-	-				-	-	-			Match Match			+	-				-	-	-	
										-					Match Match				Mat Mat	ch																Match Match									-		
\rightarrow					-			_	_	-	_	\rightarrow			Match		_	-	Mat		=			_	_	_	$\overline{}$		_	_	_	_	=			Match		_	-	-				-	_	-	Н

2024 Numbe		,		_							_	_	_	_	_	_				_			_				_	$\overline{}$	$\overline{}$	-	-
and 4	Bedford Blair	Cambria Clearfield H	luntingdon Jeffer	son Somerse	t 5	Centre	Columbia	ehigh Mit	fflin Mon	tour Northampt	Northumber on d	lan Schuylki	II Snyder	Union	6	Adams	Berks I	ancaster	York 7	Bucks	Chester		Montgomer y	Philadelphia		Cumberlan d		Franklin F	- Fulton Jun	ata Lebanon	Perry
0 Match	0 0	0 0	0	0	0 Match	0	0	0	0	0	0	0	0	0	0 Match	0	0	0	0 Match	0	0	0	0	0	Match		0 0	0	0	0 0	0
																												_		_	
Match					Match										Match				Match						Match					/ /	
Match					Match										Match				Match						Match						
																												/ 7		/	
Match				_	Match	_	_	_	_		_	_	_	_	Match		_	_	Match			_			Match			-	_	-	
Match					Match										Match				Match						Match			/ 7		/	
IWIGUCII					IVIGULII					_			_	_	iviatcii				Widtell			_			IWIGUCII			-		-	
Match					Match										Match				Match						Match			/ 7		/	
Match					Match										Match				Match						Match						
Match					Match								_		Match				Match			_			Match						
																												/ 7		/	
Match					Match	_			_				_	_	Match		_	_	Match			_			Match		_	-	_	-	
Match					Match										Match				Match						Match			/ 7		/	
Match					Match						_				Match				Match						Match					_	
Match					Match										Match				Match						Match						
Match					Match										Match				Match						Match						
Match					Match										Match				Match						Match						
Match					Match								-		Match				Match						Match						
Match					Match										Match				Match						Match						

PA Rate Template Part VI - Rate Change Summary Table 15. Rate Change Summary Information

Overview
Initial Requested Average Rate Change:
Revised Requested Average Rate Change:
Minimum Requested Rate Change:
Maximum Requested Rate Change:
Mayed Mapped Members:
Available in Rating Areas:

Key Information
Jan. 2023 - Dec. 2023 Financial Experience
Premium
Claims
Administrative Expenses
Taxes & Fees
Company Made After Taxes \$ -\$ -

The company expects its annual medical costs to increase:

Explanation of requested rate change:

Carrier Name: Product(s): Market Segment: Rate Effective Date:

Partners Insurance Company, dba Jefferson Health Plans PPO Individual 1/1/2025



Rating Area	Active Rating Areas	Count of Remaining Active Rating Areas		Text
1			1	
2			1	
3			1	
4			1	
5			1	
6		6	1	6
7			0	
8			0	
9			0	

PA Rate Quarterly Template Part V Consumer Factors

Table 12. Age and Tobacco Factors

	Proj	ection Perio	d Age and	Tobacco F	actors	
Age	Age	Tobacco		Age	Age	Tobacco
Band	Factor	Factor		Band	Factor	Factor
0-14	0.765			40	1.278	1.100
15	0.833			41	1.302	1.100
16	0.859			42	1.325	1.100
17	0.885			43	1.357	1.100
18	0.913			44	1.397	1.100
19	0.941			45	1.444	1.100
20	0.970			46	1.500	1.100
21	1.000	1.100		47	1.563	1.100
22	1.000	1.100		48	1.635	1.100
23	1.000	1.100		49	1.706	1.100
24	1.000	1.100		50	1.786	1.100
25	1.004	1.100		51	1.865	1.100
26	1.024	1.100		52	1.952	1.100
27	1.048	1.100		53	2.040	1.100
28	1.087	1.100		54	2.135	1.100
29	1.119	1.100		55	2.230	1.100
30	1.135	1.100		56	2.333	1.100
31	1.159	1.100		57	2.437	1.100
32	1.183	1.100		58	2.548	1.100
33	1.198	1.100		59	2.603	1.100
34	1.214	1.100		60	2.714	1.100
35	1.222	1.100		61	2.810	1.100
36	1.230	1.100		62	2.873	1.100
37	1.238	1.100		63	2.952	1.100
38	1.246	1.100		64+	3.000	1.100
39	1.262	1.100				

^{*}PA follows the federal default age curve.

Carrier Name: Partners Insurance Company, dba Jefferson Health Plans

Carrier Name: Partners In Product(s): PPO Market Segment: Individual Rate Effective Date: 1/1/2025

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	Lehigh, Northampton		1.000
Rating Area 7			
Rating Area 8			
Rating Area 9			

Table 14. Network Factors

Projection Period Network	Factors		
Rating Area	Current Factor	Proposed Factor	Approval Date
		1.000	1/1/2025
		Rating Area	Rating Area Current Proposed

Table 16. Risk Adjustme	nt Calculation	
Component	Statewide	Insurer Specific
State Average Monthly Premium Before Adjustment	\$658.94	
Administrative Cost Adjustment	0.86	
State Average Monthly Premium	566.69	
Actuarial Value (AV)	0.72	
Plan Liability Risk Score (PLRS)	1.25	
Allowable Rating Factor (ARF)	1.82	
nduced Demand Factor (IDF)	1.04	
Geographic Cost Factor (GCF)	1.00	
Factors Including Risk Score	1.31	
Factors Excluding Risk Score	1.37	
Risk Adjustment Transfer PMPM		
Insurer Specific Manual Adjustment PMPM		
High Cost Risk Pool Adjustment PMPM		
Total Risk Adjustment Transfer		

Company Name: urance Company, dba Jefferson
Market: Individual
Product: PPO
Effective Date of Rates: January 1, 2025

Ending date of Rates:

December 31, 2025

HIOS Plan ID (On Exchange)=>	19702PA	0010006	19702PA	0010005	19702PA0	010004	1970204	N0010001	19702PA	0010002	19702PA	0010007	19702PA	0010008	197020/	A0010009	19702PA	0010003
HIOS Plan ID (Off Exchange)=>		0010006	19702PA		19702PA0			0010001	19702PA		19702PA		19702PA			A0010009	19702PA	
Plan Marketing Name =>					Health Plans + \$0													
Form # =>	PICI-134	1094722	PICI-134	094722	PICI-1340	94722	PICI-134	4094722	PICI-134	1094722	PICI-134	094722	PICI-13	1094722	PICI-13	4094722	PICI-134	1094722
Rating Area =>	Rating	Area 6	Rating	Area 6	Rating A	rea 6	Rating	Area 6	Rating	Area 6	Rating	Area 6	Rating	Area 6	Rating	Area 6	Rating	Area 6
Network =>	JHP Ne		JHP Ne		JHP Net			etwork	JHP Ne		JHP Ne			etwork		etwork	JHP Ne	
Metal =>	Silv	ver	Silv	er	Silve	er	Bro	nze	Bro	nze	Go	ld	G	old	G	old	Bro	nze
Deductible =>	\$5,	500	\$3,5	500	\$5,00	00	\$5,	000	\$7,4	450	\$	0	\$1,	500	\$2,	,000	\$8,0	000
Coinsurance =>	50)%	50	%	50%	6	50	0%	50	1%	50	%	50)%	50	0%	09	%
Copays =>	40,	90	45,	90	55, 9	15	100,	, 150	60,	95	25,	65	20	. 50	15	, 45	0,	0
OOP Maximum =>	\$9,		\$9,2		\$9,20		\$9,		\$9,2	200	\$9,	200		200		,200	\$8,0	
Pediatric Dental (Yes/No) =>		lo	N		No			lo	N		N	-		lo		lo	N	
Age Band	Non-Tobacco	Tobacco																
0 - 14	\$394.94	\$394.94	\$396.49	\$396.49	\$420.73	\$420.73	\$282.42	\$282.42	\$279.99	\$279.99	\$357.82	\$357.82	\$344.77	\$344.77	\$343.65	\$343.65	\$271.74	\$271.74
15	\$430.05	\$430.05	\$431.74	\$431.74	\$458.12	\$458.12	\$307.52	\$307.52	\$304.88	\$304.88	\$389.62	\$389.62	\$375.42	\$375.42	\$374.20	\$374.20	\$295.90	\$295.90
16	\$443.47	\$443.47	\$445.21	\$445.21	\$472.42	\$472.42	\$317.12	\$317.12	\$314.40	\$314.40	\$401.78	\$401.78	\$387.14	\$387.14	\$385.88	\$385.88	\$305.13	\$305.13
17	\$456.90	\$456.90	\$458.69	\$458.69	\$486.72	\$486.72	\$326.72	\$326.72	\$323.91	\$323.91	\$413.95	\$413.95	\$398.86	\$398.86	\$397.56	\$397.56	\$314.37	\$314.37
18	\$471.35	\$471.35	\$473.20	\$473.20	\$502.12	\$502.12	\$337.05	\$337.05	\$334.16	\$334.16	\$427.04	\$427.04	\$411.48	\$411.48	\$410.13	\$410.13	\$324.32	\$324.32
19	\$485.81	\$485.81	\$487.71	\$487.71	\$517.52	\$517.52	\$347.39	\$347.39	\$344.41	\$344.41	\$440.14	\$440.14	\$424.10	\$424.10	\$422.71	\$422.71	\$334.26	\$334.26
20 21	\$500.78 \$516.27	\$500.78 \$567.90	\$502.74 \$518.29	\$502.74 \$570.12	\$533.47 \$549.97	\$533.47 \$604.97	\$358.10 \$369.17	\$358.10 \$406.09	\$355.02 \$366.01	\$355.02 \$402.61	\$453.70 \$467.74	\$453.70 \$514.51	\$437.16 \$450.69	\$437.16 \$495.76	\$435.74 \$449.22	\$435.74 \$494.14	\$344.56 \$355.22	\$344.56 \$390.74
21 22		\$567.90		\$570.12 \$570.12				,	, , , , ,		\$467.74		\$450.69			\$494.14	1 ,	\$390.74
22 23	\$516.27 \$516.27	\$567.90	\$518.29 \$518.29	\$570.12	\$549.97 \$549.97	\$604.97 \$604.97	\$369.17 \$369.17	\$406.09 \$406.09	\$366.01 \$366.01	\$402.61 \$402.61	\$467.74	\$514.51 \$514.51	\$450.69	\$495.76 \$495.76	\$449.22 \$449.22	\$494.14	\$355.22 \$355.22	\$390.74
24	\$516.27	\$567.90	\$518.29	\$570.12	\$549.97	\$604.97	\$369.17	\$406.09	\$366.01	\$402.61	\$467.74	\$514.51	\$450.69	\$495.76	\$449.22	\$494.14	\$355.22	\$390.74
25	\$518.33	\$570.16	\$520.36	\$570.12	\$552.17	\$607.39	\$370.65	\$406.09	\$367.47	\$402.61	\$467.74	\$514.51	\$450.69	\$495.76	\$449.22	\$494.14	\$355.22	\$390.74
26	\$528.66	\$581.53	\$530.73	\$583.80	\$563.17	\$619.49	\$378.03	\$415.83	\$374.79	\$412.27	\$478.96	\$526.86	\$461.50	\$507.65	\$460.00	\$506.00	\$363.75	\$400.13
27	\$541.05	\$595.16	\$543.17	\$597.49	\$576.37	\$634.01	\$386.89	\$425.58	\$383.57	\$421.93	\$490.19	\$539.21	\$472.32	\$519.55	\$470.78	\$517.86	\$372.27	\$409.50
28	\$561.18	\$617.30	\$563.38	\$619.72	\$597.82	\$657.60	\$401.29	\$441.42	\$397.85	\$437.64	\$508.43	\$559.27	\$489.90	\$538.89	\$488.30	\$537.13	\$386.12	\$424.73
29	\$577.70	\$635.47	\$579.97	\$637.97	\$615.42	\$676.96	\$413.10	\$454.41	\$409.56	\$450.52	\$523.40	\$575.74	\$504.32	\$554.75	\$502.67	\$552.94	\$397.49	\$437.24
30	\$585.96	\$644.56	\$588.26	\$647.09	\$624.22	\$686.64	\$419.01	\$460.91	\$415.42	\$456.96	\$530.88	\$583.97	\$511.53	\$562.68	\$509.86	\$560.85	\$403.17	\$443.49
31	\$598.35	\$658.19	\$600.70	\$660.77	\$637.41	\$701.15	\$427.87	\$470.66	\$424.20	\$466.62	\$542.11	\$596.32	\$522.34	\$574.57	\$520.64	\$572.70	\$411.70	\$452.87
32	\$610.74	\$671.81	\$613.14	\$674.45	\$650.61	\$715.67	\$436.73	\$480.40	\$432.98	\$476.28	\$553.33	\$608.66	\$533.16	\$586.48	\$531.42	\$584.56	\$420.23	\$462.25
33	\$618.49	\$680.34	\$620.91	\$683.00	\$658.86	\$724.75	\$442.27	\$486.50	\$438.47	\$482.32	\$560.35	\$616.39	\$539.92	\$593.91	\$538.16	\$591.98	\$425.55	\$468.11
34	\$626.75	\$689.43	\$629.21	\$692.13	\$667.66	\$734.43	\$448.18	\$493.00	\$444.33	\$488.76	\$567.83	\$624.61	\$547.13	\$601.84	\$545.35	\$599.89	\$431.24	\$474.36
35	\$630.88	\$693.97	\$633.35	\$696.69	\$672.06	\$739.27	\$451.13	\$496.24	\$447.26	\$491.99	\$571.57	\$628.73	\$550.74	\$605.81	\$548.94	\$603.83	\$434.08	\$477.49
36	\$635.01	\$698.51	\$637.50	\$701.25	\$676.46	\$744.11	\$454.08	\$499.49	\$450.19	\$495.21	\$575.31	\$632.84	\$554.34	\$609.77	\$552.54	\$607.79	\$436.92	\$480.61
37	\$639.14	\$703.05	\$641.64	\$705.80	\$680.86	\$748.95	\$457.04	\$502.74	\$453.11	\$498.42	\$579.06	\$636.97	\$557.95	\$613.75	\$556.13	\$611.74	\$439.76	\$483.74
38	\$643.27	\$707.60	\$645.79	\$710.37	\$685.26	\$753.79	\$459.99	\$505.99	\$456.04	\$501.64	\$582.80	\$641.08	\$561.55	\$617.71	\$559.72	\$615.69	\$442.60	\$486.86
39	\$651.53	\$716.68	\$654.08	\$719.49	\$694.06	\$763.47	\$465.90	\$512.49	\$461.90	\$508.09	\$590.28	\$649.31	\$568.77	\$625.65	\$566.91	\$623.60	\$448.29	\$493.12
40	\$659.79	\$725.77	\$662.38	\$728.62	\$702.86	\$773.15	\$471.80	\$518.98	\$467.75	\$514.53	\$597.77	\$657.55	\$575.98	\$633.58	\$574.10	\$631.51	\$453.97	\$499.37
41	\$672.18	\$739.40	\$674.82	\$742.30	\$716.06	\$787.67	\$480.66	\$528.73	\$476.54	\$524.19	\$608.99	\$669.89	\$586.79	\$645.47	\$584.88	\$643.37	\$462.50	\$508.75
42	\$684.05	\$752.46	\$686.74	\$755.41	\$728.71	\$801.58	\$489.15	\$538.07	\$484.96	\$533.46	\$619.75	\$681.73	\$597.16	\$656.88	\$595.21	\$654.73	\$470.67	\$517.74
43	\$700.57	\$770.63	\$703.32	\$773.65	\$746.31	\$820.94	\$500.97	\$551.07	\$496.67	\$546.34	\$634.72	\$698.19	\$611.58	\$672.74	\$609.59	\$670.55	\$482.03	\$530.23
44	\$721.22	\$793.34	\$724.05	\$796.46	\$768.31	\$845.14	\$515.73	\$567.30	\$511.31	\$562.44	\$653.43	\$718.77	\$629.61	\$692.57	\$627.55	\$690.31	\$496.24	\$545.86
45 46	\$745.49 \$774.40	\$820.04 \$851.84	\$748.41 \$777.44	\$823.25 \$855.18	\$794.16 \$824.95	\$873.58 \$907.45	\$533.08 \$553.76	\$586.39 \$609.14	\$528.51 \$549.01	\$581.36 \$603.91	\$675.41 \$701.60	\$742.95 \$771.76	\$650.79 \$676.03	\$715.87 \$743.63	\$648.67 \$673.82	\$713.54 \$741.20	\$512.94 \$532.83	\$564.23 \$586.11
46 47	\$806.92	\$851.84	\$777.44	\$855.18 \$891.10	\$824.95	\$907.45	\$553.76	\$634.72	\$549.01	\$629.28	\$701.60	\$7/1.76	\$676.03	\$743.63	\$673.82	\$741.20	\$532.83	\$586.11
47	\$844.10	\$928.51	\$810.09	\$932.15	\$899.20	\$989.12	\$603.60	\$663.96	\$598.42	\$658.26	\$764.75	\$841.23	\$704.42	\$810.56	\$702.12	\$807.92	\$580.78	\$638.86
48	\$880.75	\$968.83	\$847.41	\$932.15	\$938.25	\$1,032.08	\$629.81	\$692.79	\$624.40	\$686.84	\$797.96	\$841.23	\$756.87	\$810.56	\$766.36	\$843.00	\$606.01	\$666.61
50	\$922.05	\$1,014.26	\$925.67	\$1,018.24	\$982.25	\$1,080.48	\$659.34	\$725.27	\$653.69	\$719.06	\$835.38	\$918.92	\$804.92	\$885.41	\$802.30	\$882.53	\$634.42	\$697.86
51	\$962.84	\$1,059.12	\$966.61	\$1,063.27	\$1,025.69	\$1,128.26	\$688.51	\$757.36	\$682.60	\$750.86	\$872.33	\$959.56	\$840.53	\$924.58	\$837.79	\$921.57	\$662.49	\$728.74
52	\$1,007.75	\$1,108.53	\$1,011.70	\$1,112.87	\$1,073.54	\$1,180.89	\$720.62	\$792.68	\$714.44	\$785.88	\$913.02	\$1,004.32	\$879.74	\$967.71	\$876.87	\$964.56	\$693.39	\$762.73
53	\$1,053.18	\$1,158.50	\$1,057.31	\$1,163.04	\$1,121.94	\$1,234.13	\$753.11	\$828.42	\$746.65	\$821.32	\$954.18	\$1,049.60	\$919.40	\$1,011.34	\$916.40	\$1,008.04	\$724.65	\$797.12
54	\$1,102.23	\$1,212.45	\$1,106.55	\$1,217.21	\$1,174.18	\$1,291.60	\$788.18	\$867.00	\$781.42	\$859.56	\$998.61	\$1,098.47	\$962.21	\$1,058.43	\$959.08	\$1,054.99	\$758.40	\$834.24
55	\$1,151.27	\$1,266.40	\$1,155.79	\$1,271.37	\$1,226.43	\$1,349.07	\$823.25	\$905.58	\$816.19	\$897.81	\$1,043.05	\$1,147.36	\$1,005.03	\$1,105.53	\$1,001.75	\$1,101.93	\$792.14	\$871.35
56	\$1,204.45	\$1,324.90	\$1,209.17	\$1,330.09	\$1,283.08	\$1,411.39	\$861.28	\$947.41	\$853.89	\$939.28	\$1,091.23	\$1,200.35	\$1,051.45	\$1,156.60	\$1,048.02	\$1,152.82	\$828.73	\$911.60
57	\$1,258.14	\$1,383.95	\$1,263.08	\$1,389.39	\$1,340.28	\$1,474.31	\$899.67	\$989.64	\$891.95	\$981.15	\$1,139.87	\$1,253.86	\$1,098.32	\$1,208.15	\$1,094.74	\$1,204.21	\$865.67	\$952.24
58	\$1,315.45	\$1,447.00	\$1,320.61	\$1,452.67	\$1,401.32	\$1,541.45	\$940.65	\$1,034.72	\$932.58	\$1,025.84	\$1,191.79	\$1,310.97	\$1,148.35	\$1,263.19	\$1,144.60	\$1,259.06	\$905.10	\$995.61
59	\$1,343.84	\$1,478.22	\$1,349.11	\$1,484.02	\$1,431.57	\$1,574.73	\$960.96	\$1,057.06	\$952.71	\$1,047.98	\$1,217.51	\$1,339.26	\$1,173.13	\$1,290.44	\$1,169.31	\$1,286.24	\$924.64	\$1,017.10
60	\$1,401.15	\$1,541.27	\$1,406.64	\$1,547.30	\$1,492.62	\$1,641.88	\$1,001.93	\$1,102.12	\$993.34	\$1,092.67	\$1,269.43	\$1,396.37	\$1,223.16	\$1,345.48	\$1,219.17	\$1,341.09	\$964.07	\$1,060.48
61	\$1,450.71	\$1,595.78	\$1,456.40	\$1,602.04	\$1,545.41	\$1,699.95	\$1,037.37	\$1,141.11	\$1,028.47	\$1,131.32	\$1,314.34	\$1,445.77	\$1,266.43	\$1,393.07	\$1,262.30	\$1,388.53	\$998.17	\$1,097.99
62	\$1,483.23	\$1,631.55	\$1,489.05	\$1,637.96	\$1,580.06	\$1,738.07	\$1,060.63	\$1,166.69	\$1,051.53	\$1,156.68	\$1,343.80	\$1,478.18	\$1,294.82	\$1,424.30	\$1,290.60	\$1,419.66	\$1,020.55	\$1,122.61
63	\$1,524.02	\$1,676.42	\$1,530.00	\$1,683.00	\$1,623.51	\$1,785.86	\$1,089.80	\$1,198.78	\$1,080.45	\$1,188.50	\$1,380.75	\$1,518.83	\$1,330.42	\$1,463.46	\$1,326.08	\$1,458.69	\$1,048.61	\$1,153.47
64+	\$1,548.80	\$1,703.68	\$1,554.87	\$1,710.36	\$1,649.91	\$1,814.90	\$1,107.51	\$1,218.26	\$1,098.02	\$1,207.82	\$1,403.21	\$1,543.53	\$1,352.06	\$1,487.27	\$1,347.65	\$1,482.42	\$1,065.66	\$1,172.23

Page Number: 1 12/24/2014

Partners Insurance Company, dba Jefferson Health Plans Individual Plan Design Summary

				On/Off			
HIOS Plan ID	Plan Marketing Name	Product	Metal	Exchange	Network	Rating Area	Counties Covered
19702PA0010006	Jefferson Health Plans + Total + Silver + PPO	PPO	Silver	On/Off	JHP Network	Rating Area 6	Lehigh, Northampton
19702PA0010005	Jefferson Health Plans + Balanced + Silver + PPO	PPO	Silver	On/Off	JHP Network	Rating Area 6	Lehigh, Northampton
19702PA0010004	Jefferson Health Plans + \$0 Deductible + Silver + PPO	PPO	Silver	On/Off	JHP Network	Rating Area 6	Lehigh, Northampton
19702PA0010001	Jefferson Health Plans + \$0 Deductible + Bronze + PPO	PPO	Bronze	On/Off	JHP Network	Rating Area 6	Lehigh, Northampton
19702PA0010002	Jefferson Health Plans + Total + Bronze + PPO	PPO	Bronze	On/Off	1	Rating Area 6	Lehigh, Northampton
19702PA0010007	Jefferson Health Plans + \$0 Deductible + Gold + PPO	PPO	Gold	On/Off	1	Rating Area 6	Lehigh, Northampton
19702PA0010008	Jefferson Health Plans + Total + Gold + PPO	PPO	Gold	On/Off		Rating Area 6	Lehigh, Northampton
19702PA0010009	Jefferson Health Plans + Value + Gold + PPO	PPO	Gold	On/Off	JHP Network	Rating Area 6	Lehigh, Northampton
19702PA0010003	Jefferson Health Plans + Value + Bronze + PPO	PPO	Bronze	On/Off	JHP Network	Rating Area 6	Lehigh, Northampton
1	1	1	1	1	1		

Page Number: 2 12/24/2014

Company Name Partners Insurance Company, dba Jefferson Health Plans

Market Individual

RATES FOR AGE 21, NON-TOBACCO USER, BY RATING AREA AND COUNTY

	02-01-2024 Number of Covered Lives by Rating County												
HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange									
19702PA0010006	Jefferson Health Plans + Total + Silver + PPO	PPO	Silver	On/Off									
19702PA0010005	Jefferson Health Plans + Balanced + Silver + PPO	PPO	Silver	On/Off									
19702PA0010004	efferson Health Plans + \$0 Deductible + Silver + PPC	PPO	Silver	On/Off									
19702PA0010001	efferson Health Plans + \$0 Deductible + Bronze + PP	PPO	Bronze	On/Off									
19702PA0010002	Jefferson Health Plans + Total + Bronze + PPO	PPO	Bronze	On/Off									
19702PA0010007	Jefferson Health Plans + \$0 Deductible + Gold + PPO	PPO	Gold	On/Off									
19702PA0010008	Jefferson Health Plans + Total + Gold + PPO	PPO	Gold	On/Off									
19702PA0010009	Jefferson Health Plans + Value + Gold + PPO	PPO	Gold	On/Off									
19702PA0010003	Jefferson Health Plans + Value + Bronze + PPO	PPO	Bronze	On/Off									

RATING ARE	A 1							_	RATING AF	REA 2
0	0	0	0	0	0	0	0	П	0	0
Crawford	Clarion	Erie	Forest	Mckean	Mercer	Venango	Warren		Elk	Cameror

RATING AREA 3

	ILATING AILE	<u> </u>											
0	0	0	0	0	0	0	0	0	0	0	0	0	0
Potter	Bradford	Carbon	Clinton	Lackawanna	Luzerne	Lycoming	Monroe	Pike	Sullivan	Susquehanna	Tioga	Wayne	Wyoming

RATING AREA 4

	•				
0	0	0	0	0	0
Allegheny	Armstrong	Beaver	Butler	Fayette	Greene

RATING AREA

0	
Westmoreland	E

0

Lawrence

Indiana

0

Washington

Dealora	Dian	Cicarneia	Cambria	Hantingaon	Jenerson	Joinerset
Bedford	Blair	Clearfield	Cambria	Huntingdon	Jefferson	Somerset
0	0	0	0	0	0	0
ATING AR	EA 5					

RATING AREA 6

0	0	0	0	0	0	0
Centre	Columbia	Lehigh	Mifflin	Montour	Northampton	Northumberland
		\$516.27			\$516.27	
		\$518.29			\$518.29	
		\$549.97			\$549.97	
		\$369.17			\$369.17	
		\$366.01			\$366.01	
		\$467.74			\$467.74	
		\$450.69			\$450.69	
		\$449.22			\$449.22	

\$355.22

\$355.22

RATING AREA 7

RATING AREA 8

RATING AREA 9

0	0	0	
Schuylkill	Snyder	Union	

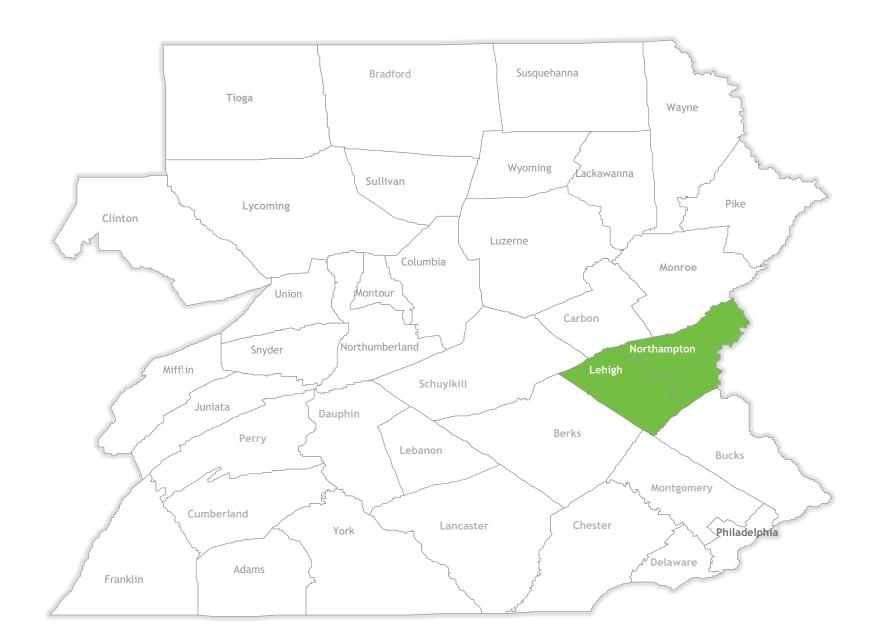
Adams	Berks	Lancaster	York
0	0	0	0
10/11/11/07/11			

KATING AF	EA 8			
Bucks	Chester	Delaware	Montgomery	Philadelphia

Cumberiana	Daupiiiii	Hankini	Tuiton	Jumata	LCDanon	1 City
Cumberland	Daunhin	Franklin	Fulton	luniata	Lebanon	Perrv
0	0	0	0	0	0	0
INATING AREA 3						

ACA PIC PPO





	А В	С	D		E	F		G	Н	- 1	J		K L		М	N	0	P	Q	R	S	T
1	Unified Rate Review v6.0			•		•							dd a product t									٥.
3	Company Legal Name:	Partners Insurance Company,	dba Jefferson Health Plans										alidate, select									
4	HIOS Issuer ID:	19702	State:	PA									nalize, select t									
5	Effective Date of Rate Change(s):	1/1/2025	Market:	Individ	dual							, , , ,	ranze, sereet t	tire i iiidi	ize buttor	0, 0,,,	,					
	Effective Date of Nate change(s).	1/1/2023	WIGH KCC.	mari	uuu																	
7																						
1 2 3 4 5 6 7 7 8 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Market Level Calculations (Same for a	ill Plans)																				
10	Section I: Experience Period Data																					
12	Experience Period:			1/1/2023	to	12/31/2023																
13	,				Total	PMPM																
14	Allowed Claims				\$0.0	00	#DIV/0!															
15	Reinsurance				\$0.0		#DIV/0!															
16	Incurred Claims in Experience Period				\$0.0		#DIV/0!															
17	Risk Adjustment				\$0.0		#DIV/0!															
18	Experience Period Premium				\$0.0		#DIV/0!															
19	Experience Period Member Months					0																
21	Section II: Projections			Year 1 Trend	4		Year 2 Tr	rond														
-22		Experience Period Index		real I frenc	u	_	Teal 2 II	renu	Trended EHB Allowed Claims													
23	Benefit Category	Rate PMPM	Cost		Utilization	Cost		Utilization	PMPM													
24	Inpatient Hospital	\$0.00		1.000	1.00		1.000	1.000	\$0.00													
25	Outpatient Hospital	\$0.00		1.000	1.00		1.000	1.000	\$0.00													
26	Professional	\$0.00		1.000	1.00	00	1.000	1.000	\$0.00													
27	Other Medical	\$0.00		1.000	1.00		1.000	1.000	\$0.00													
28	Capitation	\$0.00		1.000	1.00		1.000	1.000	\$0.00													
29	Prescription Drug	\$0.00		1.000	1.00	00	1.000	1.000	\$0.00													
30	Total	\$0.00	PI						\$0.00													
31	Morbidity Adjustment						1.000															
32	Demographic Shift						1.000															
34	Plan Design Changes						1.000															
35	Other						1.000															
36	Adjusted Trended EHB Allowed Claims	PMPM for		1/1/2025			\$0.00															
37																						
38	Manual EHB Allowed Claims PMPM						\$957.50															
39	Applied Credibility %						0.00%															
40								Projected Period Totals														
41	Projected Index Rate for			1/1/2025		1	\$957.50	\$5,745,000.00	ı													
42	Reinsurance			1/1/2025			\$52.68	\$316,080.00														
44	Risk Adjustment Payment/Charge						\$39.99	\$239,940.00														
45	Exchange User Fees						2.96%	\$158,278.86														
46	Market Adjusted Index Rate						\$891.21	\$5,347,258.86														
23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49	Projected Member Months						6,000															
49						-	0,000															
П																						

A	В С	D	E	F	G	Н	1	J	K	L	М	N 0	P Q	R	S	Т	U	٧
1	Product-Plan Data Collection												To add a product to Worksheet 2					
2													To add a plan to Worksheet 2 - P		Add Plan button or Ctrl +	Shift + L		
3	Company Legal Name:		Company, dba Jeffer										To validate, select the Validate b	utton or Ctrl + Shift + I.				
4	HIOS Issuer ID:		State.	PA									To finalize, select the Finalize but					
5	Effective Date of Rate Change(s):	1/1/2025	Market:	Individual									To remove a product, navigate to					
7	Product/Plan Level Calculations												To remove a plan, navigate to th	e corresponding Plan Name,	/Plan ID field and select i	the Remove Plan butt	on or Ctrl + Shift	+ A.
8	Troducy Fair Ecres calculations																	
9	Field # Section I: General Product and Plan Information																	
10	1.1 Product Name						Individual PPO											
11	1.2 Product ID 1.3 Plan Name		Diago - Tatal -	Plans + Balanced +	Plans + \$0	Plans + \$0	19702PA001 Plans + Total +	Plans + \$0	Diana - Tatal -	Plans + Value +	Diagon Malura							
13	1.4 Plan ID (Standard Component ID)			19702PA0010005														
14	1.5 Metal		Silver	Silver	Silver	Bronze	Bronze	Gold	Gold	Gold	Bronze							
15	1.6 AV Metal Value		0.703	0.700	0.706	0.650	0.640	0.792	0.780	0.795	0.630							
16	1.7 Plan Category		New	New	New	New	New	New	New	New	New							
17	1.8 Plan Type		PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO Yes							
18	1.9 Exchange Plan? 1.10 Effective Date of Proposed Rates		Yes 1/1/2025	Yes 1/1/2025	Yes 1/1/2025	Yes 1/1/2025	Yes 1/1/2025	Yes 1/1/2025	Yes 1/1/2025	Yes 1/1/2025	1/1/2025							
20	1.11 Cumulative Rate Change % (over 12 mos prior)		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%							
5 6 6 7 7 8 8 9 10 10 11 12 13 13 13 13 13 13 13 13 13 13 13 13 13	1.12 Product Rate Increase %						0.00%											
22	1.13 Submission Level Rate Increase %						0.00%											
23 24 Worksheet 1 Totals	T controllicturations builded and c 100 1																	
24 Worksheet 1 Totals 25	Section II: Experience Period and Current Plan Lev 2.1 Plan ID (Standard Component ID)	vel Information Total	19702PA0010006	19702PA0010005	19702PA0010004	19702PA0010001	19702PA0010002	19702PA0010007	19702PA0010008	19702PA0010000	19702PA0010003							
26 \$0		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0							
27 \$0		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0							
28	2.4 Member Cost Sharing	\$0		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0							
29	2.5 Cost Sharing Reduction	\$0		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0							
30 \$0 31 \$0		\$0 \$0		\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0							
	0 2.8 Premium	\$0		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0							
33 (0 2.9 Experience Period Member Months	0	0	0	0	0	0	0	0	0	0							
34	2.10 Current Enrollment	0	0	0	0	0	0	0	0	0	0							
35 36 37	2.11 Current Premium PMPM 2.12 Loss Ratio	#DIV/0!	\$0.00 #DIV/0!	\$0.00 #DIV/0!	\$0.00 #DIV/0!	\$0.00 #DIV/0!	\$0.00 #DIV/0!	\$0.00 #DIV/0!	\$0.00 #DIV/0!	\$0.00 #DIV/0!	\$0.00 #DIV/0!							
37	Per Member Per Month	#DIV/U!	#DIV/U!	#DIV/0!	#DIV/U!	#DIV/U!	#DIV/0!	#010/0!	#DIV/U!	#DIV/0!	#DIV/U!							
38	2.13 Allowed Claims	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!							
39	2.14 Reinsurance	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!							
40	2.15 Member Cost Sharing	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!							
41	2.16 Cost Sharing Reduction 2.17 Incurred Claims	#DIV/0!	#DIV/0! #DIV/0!	#DIV/0!	#DIV/0! #DIV/0!	#DIV/0!	#DIV/0! #DIV/0!	#DIV/0! #DIV/0!	#DIV/0! #DIV/0!	#DIV/0!	#DIV/0!							
42	2.17 Incurred Claims 2.18 Risk Adjustment Transfer Amount	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!							
44	2.19 Premium	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!							
45																		
46	Section III: Plan Adjustment Factors 3.1 Plan ID (Standard Component ID)		10703040010006	19702PA0010005	10703040010004	10702040010001	10702040010002	10702040010007	10702040010000	10702040010000	10703040010002							
48	3.2 Market Adjusted Index Rate		19702FA0010000	19702FA0010003	19702FA0010004	19702FA0010001	\$891.21	19702FA0010007	19702FA0010008	19702FA0010009	19702FA0010003							
49	3.3 AV and Cost Sharing Design of Plan		0.9466	0.9506	1.0124	0.6593	0.6531	0.8518	0.8185	0.8156	0.6321							
50	3.4 Provider Network Adjustment		1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000							
51	3.5 Benefits in Addition to EHB Administrative Costs		1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000							
53	3.6 Administrative Expense		5.99%	5.96%	5 62%	8 37%	8 45%	6.61%	6.86%	6.88%	8.70%							
54	3.7 Taxes and Fees		2.08%	2.08%	2.08%	2.08%	2.08%	2.08%	2.08%	2.08%	2.08%							
55	3.8 Profit & Risk Load		0.08%	0.08%	0.08%	0.08%	0.08%	0.08%	0.08%	0.08%	0.08%							
56	3.9 Catastrophic Adjustment	-	1.0000 \$918.44	1.0000 \$922.04	1.0000 \$978.40	1.0000 \$656.76	1.0000 \$651.12	1.0000 \$832.10	1.0000 \$801.77	1.0000 \$799.16	1.0000 \$631.94							
58	3.10 Plan Adjusted Index Rate		\$918.44	\$922.04	\$978.40	\$656.76	\$651.12	\$832.10	\$801.77	\$799.16	\$631.94							
59	3.11 Age Calibration Factor	0.5634					0.5634											
60	3.12 Geographic Calibration Factor	1.0000					1.0000											
61	3.13 Tobacco Calibration Factor 3.14 Calibrated Plan Adjusted Index Rate	0.9977	\$516.26	\$518.28	\$549.96	\$369.17	0.9977 \$366.00	\$467.73	\$450.68	\$449.21	6255.22							
63	3.14 Canorated Plan Adjusted Index Rate		\$516.26	\$518.28	\$549.96	\$369.17	\$366.00	\$467.73	\$450.68	\$449.21	\$355.22							
64	Section IV: Projected Plan Level Information																	
65	4.1 Plan ID (Standard Component ID)			19702PA0010005														
66	4.2 Allowed Claims	\$5,745,026	\$774,137	\$775,284	\$793,418	\$433,538	\$432,734	\$707,922	\$699,312	\$698,581	\$430,100							
67	4.3 Reinsurance 4.4 Member Cost Sharing	\$265,525 \$918,805	\$34,474 \$75.611	\$34,474 \$74.088	\$34,474 \$50.453	\$21,375 \$120.689	\$21,375 \$122,474	\$32,660 \$106,783	\$32,660 \$119,472	\$32,660 \$120.576	\$21,375 \$128,658							
69	4.4 Member Cost Sharing 4.5 Cost Sharing Reduction	5916,805	\$75,611	\$74,088	\$50,453	\$120,089	\$122,474	\$100,783	\$119,472	\$120,576	\$120,058							
70	4.6 Incurred Claims	\$4,560,696	\$664,052	\$666,722	\$708,491	\$291,474	\$288,885	\$568,479	\$547,181	\$545,345	\$280,068							
71	4.7 Risk Adjustment Transfer Amount	\$201,577	\$26,171	\$26,171	\$26,171	\$16,227	\$16,227	\$24,794	\$24,794	\$24,794	\$16,227							
72	4.8 Premium	\$4,928,489	\$715,475	\$718,281	\$762,183	\$317,219	\$314,498	\$614,101	\$591,716	\$589,786	\$305,230							
74	4.9 Projected Member Months 4.10 Loss Ratio	6,000 88,90%	779 89.54%	779 89.56%	779 89.87%	483 87.41%	483 87.35%	738 88.98%	738 88.75%	738 88.73%	483 87.12%							
75	Per Member Per Month	66.90%	69.54%	89.56%	69.67%	67.41%	67.35%	00.98%	00.75%	00./3%	67.12%							
76	4.11 Allowed Claims	\$957.50	\$993.76	\$995.23	\$1,018.51	\$897.59	\$895.93	\$959.24	\$947.58	\$946.59	\$890.48							
77	4.12 Reinsurance	\$44.25	\$44.25	\$44.25	\$44.25	\$44.25	\$44.25	\$44.25	\$44.25	\$44.25	\$44.25							
78	4.13 Member Cost Sharing	\$153.13	\$97.06	\$95.11	\$64.77	\$249.87	\$253.57	\$144.69	\$161.89	\$163.38	\$266.37							
79	4.14 Cost Sharing Reduction	\$0.00	\$0.00 \$852.44	\$0.00	\$0.00	\$0.00 \$603.47	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00							
45 45 45 45 45 45 45 45 45 45 45 45 45 4	4.15 Incurred Claims 4.16 Risk Adjustment Transfer Amount	\$760.12 \$33.60	\$852.44 \$33.60	\$855.87 \$33.60	\$909.49 \$33.60	\$603.47 \$33.60	\$598.11 \$33.60	\$770.30 \$33.60	\$741.44 \$33.60	\$738.95 \$33.60	\$579.85 \$33.60							
82	4.17 Premium	\$821.41	\$918.45	\$922.06	\$978.41	\$656.77	\$651.13	\$832.11	\$801.78	\$799.17	\$631.95							
	•											·			·			

	A	В		С	D	Е	F	G	Н	1	J	K	L
1	Rating Area Data Collection	ag Area Data Collection Specify the total number of Rating Areas in your State by selecting the Create Rating Areas button or Ctrl + Shift + R.											
2		Select only the Rating Areas you are offering plans within and add a factor for each area.											
3	To validate, select the Validate button or Ctrl + Shift + I.												
4		To finalize, select the Finalize button or Ctrl + Shift + F.											
5	Rating Area	Rating Factor											
6	Rating Area 6	-	1.0000										

SERFF Inputs: 6,000 Projected member months

REQUESTED RATE CHANGE INFORMATION

Change Period: 1/1/2025 - 12/31/2025

Projected Period Covered Lives: 500

% Rate change requested – Min%, Max%, Weighted Avg% **BELOW** <--- only applied this to in-force premiums

0.00% 0.00% Max: Wtd Avg: 0.00% Written Premium Change: \$0

PRIOR RATE:

Total Earned Premium \$0 \$0 **Total Incurred Claims**

Annualized PMPM - \$ Min, \$ Max, \$Weighted Avg

Min: \$0.00 Max: \$0.00 Wtd Avg: #DIV/0!

REQUESTED RATE

Projected Earned Premium \$4,928,489 << matches URRT WS2

\$4,359,119

Projected Incurred Claims
Annualized PMPM - \$ Min, \$ Max, \$ Weighted Avg. BELOW

Min: \$271.74 << 19702PA0010003, Rating Area 6, Age 0-14, Non-Smoker \$1,814.90 << 19702PA0010004, Rating Area 6, Age 64 and Older, Smoker \$821.41 << Smoker and non-smoker average premium Max: Wtd Avg:

25 Rates Table Template v14.0	If you are in a community rating sta If you are not in a community rating	equired. To validate press Validate button or C ate, select Family-Tier Rates under Rating Me g state, select Age-Based Rates under Rating	thod and fill in all columns. Method and provide an Individual Rate		
	To add a new sheet, press the Add	obacco User, you must give a rate for Tobacc d Sheet button, or Ctrl + Shift + H. All plans m			
HIOS Issuer ID* Rate Effective Date*	1/1/2025				
Rate Expiration Date* Rating Method*	12/31/2025 Age-Based Rates				
Plan ID*	Rating Area ID*	Tobacco*	Age*	Individual Rate*	Individual Tobacco Rate*
Required: Enter the 14-character Plan ID	Required: Select the Rating Area ID	Required: Select if Tobacco use of subscriber is used to determine if a person is eligible for a rate from a plan	Required: Select the age of a subscriber eligible for the rate	Required: Enter the rate of an Individual Non-Tobacco or No Preference enrollee on a plan	Required: Enter the rate of an Individual tobacco enrol on a plan
19702PA0010006 19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	0-14 15 16	430.05	430.0
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	17 18		
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19 20	500.78	
19702PA0010006 19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	21 22 23	516.27	567. 567. 567.
19702PA0010006 19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	24 25	516.27	567.
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	26 27	528.66	581.
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	28 29	561.18	617.
19702PA0010006 19702PA0010006		Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	30 31	598.35	658.
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	32 33	618.49	680.
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	34 35 36	630.88	693.9
19702PA0010006 19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	37 38	639.14	
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	39 40	651.53	716.6
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	41	672.18	739.4
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	43 44		793.:
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	45 46	774.40	851.8
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	47	844.10	928.
19702PA0010006 19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	49 50 51	922.05	1014.2
19702PA0010006 19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	51 52 53	1007.75	1108.
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	54 55	1102.23	
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	56 57	1204.45	1324.9
19702PA0010006 19702PA0010006		Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	58 59		1447.0 1478.2
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	60 61	1450.71	1595.
19702PA0010006 19702PA0010006	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	62 63	1524.02	1676.4
19702PA0010006 19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	64 and over 0-14 15	396.49	396.4
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	16 17	445.21	445.2
19702PA0010005 19702PA0010005	•	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	18 19		473. 487.
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	20 21	518.29	570.
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	22 23	518.29	570.
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	24 25 26	520.36	572.
19702PA0010005 19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	26 27 28	543.17	597.
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	29	579.97	637.
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	31 32	600.70	660.
19702PA0010005 19702PA0010005		Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	33 34		683. 692.
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	35 36	637.50	701.
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	37 38	645.79	710.
19702PA0010005 19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	39 40 41	662.38	728.
19702PA0010005 19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	42	686.74	755.
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	44	724.05	
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	46 47	212.22	855
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	48 49	884.21	972
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	50 51	966.61	1063
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	52 53	1057.31	1163
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	54 55	1155.79	1271
19702PA0010005 19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	56 57 58	1263.08	
19702PA0010005 19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	59 60	1349.11	1484
19702PA0010005 19702PA0010005	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	61 62	1456.40	1602
19702PA0010005 19702PA0010005	Rating Area 6 Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	63 64 and over	1530.00 1554.87	1683 1710
19702PA0010004 19702PA0010004	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	0-14 15	458.12	458
19702PA0010004 19702PA0010004	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	16 17	486.72	486
19702PA0010004 19702PA0010004	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	18 19	517.52	517
19702PA0010004 19702PA0010004	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	20 21	549.97	604
19702PA0010004 19702PA0010004		Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	22 23		

or 24 549.97	Tobacco User/Non-Tobacco User	10702PA0010004 Pating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6 19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6 19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
or 35 672.06	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
or 36 676.46	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
or 38 685.26	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6 19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
r 53 1121.94	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
54 1174.18	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
or 55 1226.43	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6 19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6 19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6 19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010004 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
or 17 326.72	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
or 18 337.05	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
er 19 347.39	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
-	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6 19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
er 31 427.87	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
or 32 436.73	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
er 33 442.27	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
•	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6 19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
er 44 515.73	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6 19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
r 54 788.18	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6 19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6 19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
or 63 1089.80	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010001 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
er 25 367.47	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
or 26 374.79	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
26 374.79 or 27 383.57	1 1 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3	19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85	Tobacco User/Non-Tobacco User	
26 374.79 27 383.57 28 397.85 29 409.56	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 20 415.42 20 424.20		19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 20 415.42 20 31 424.20 20 32 432.98	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 20 409.56 20 415.42 20 31 424.20 20 32 432.98 20 33 438.47	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 20 415.42 20 31 424.20 20 32 432.98 20 33 438.47 20 34 444.33	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 20 41.42 20 31 424.20 20 32 432.98 20 33 438.47 20 34 444.33 20 35 447.26	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 20 415.42 20 31 424.20 20 32 432.98 20 33 438.47 20 34 444.33 20 35 447.26 20 36 450.19	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 20 415.42 20 31 424.20 20 32 432.98 20 433 438.47 20 33 438.47 20 35 447.26 20 36 450.19 20 37 453.11	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 29 415.42 20 31 424.20 20 32 432.98 20 433 438.47 20 34 444.33 20 47.26 20 36 450.19 20 37 453.11 20 38 456.04	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 20 409	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 20 415.42 20 31 424.20 20 32 432.98 20 33 438.47 20 34 444.33 20 450.19 20 35 447.26 20 36 450.19 20 37 453.11 20 38 456.04 20 39 461.90 20 47.75	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 20 415.42 20 31 424.20 20 32 432.98 20 33 438.47 20 34 444.33 20 450.19 20 36 450.19 20 37 453.11 20 38 456.04 20 39 461.90 20 47.75 20 41 476.54	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6 19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 20 414.42 20 31 424.20 20 32 432.98 20 33 438.47 20 34 444.33 20 438.47 20 35 447.26 20 36 450.19 20 37 453.11 20 38 450.49 20 39 461.90 20 40 467.75 20 41 476.54 20 484.96	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 20 31 424.20 20 31 424.20 20 32 432.98 20 433 438.47 20 33 438.47 20 34 444.33 21 438.47 20 35 447.26 20 36 450.19 20 37 453.11 20 38 456.04 20 39 461.90 20 40 467.75 20 41 47.65 20 42 484.96 20 43 496.67 20 44 511.31	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 20 31 424.20 20 32 432.98 20 33 438.47 20 34 444.33 21 438.47 20 36 457.26 20 36 457.56 20 40 467.75 20 41 476.54 20 42 484.66 20 45 43 496.67 20 44 511.31 20 52 528.51	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 20 31 424.20 20 32 432.98 20 33 438.47 20 33 438.47 20 35 447.26 20 36 450.19 20 37 453.11 20 38 456.04 20 39 461.90 20 47.75 20 40 467.75 20 41 476.54 20 484.96 20 44 511.31 20 45 528.51 20 47 549.01	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 20 415.42 20 31 424.20 20 32 432.98 20 33 438.47 20 33 438.47 20 34 444.33 20 35 447.26 20 36 450.19 20 37 453.11 20 38 456.04 20 39 461.90 20 47.75 20 41 47.6.54 20 484.96 20 496.67 20 44 511.31 20 45 528.51 20 46 549.01 20 77 572.07	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 20 415.42 20 31 424.20 20 32 432.98 20 433.3 438.47 20 35 447.26 20 36 450.19 20 37 453.11 20 38 461.90 20 467.55 20 40 467.55 20 40 46.54 20 40 47.55 20 40 48.96 20 40 49.67 20 40 49.67 20 40 49.67 20 40 49.67 20 40 49.67 20 40 49.67 20 40 49.67 20 40 49.67 20 40 49.67 20 40 46.75 20 40 46.75 20 40 47 572.07 20 48 598.42	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6
26 374.79 27 383.57 28 397.85 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 29 409.56 20 409	Tobacco User/Non-Tobacco User	19702PA0010002 Rating Area 6

	40700D40040000 D #	A 0 T			744.4	705.00
	19702PA0010002 Rating 19702PA0010002 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco		2 714.4 ⁴ 3 746.6 ⁵	
	19702PA0010002 Rating	Area 6 To	obacco User/Non-Tobacco	User 5	4 781.42	859.56
	19702PA0010002 Rating		obacco User/Non-Tobacco			
	19702PA0010002 Rating 19702PA0010002 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010002 Rating		obacco User/Non-Tobacco			
	19702PA0010002 Rating		obacco User/Non-Tobacco			
	19702PA0010002 Rating 19702PA0010002 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010002 Rating		obacco User/Non-Tobacco			
	19702PA0010002 Rating	Area 6 To	obacco User/Non-Tobacco	User 6	3 1080.45	1188.50
	19702PA0010002 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco	User 1	6 401.78	401.78
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco	User 2	9 523.40	
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			641.08
	19702PA0010007 Rating	Area 6 T	obacco User/Non-Tobacco	User 3	9 590.28	649.31
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco	User 4	3 634.72	698.19
	19702PA0010007 Rating	Area 6 T	obacco User/Non-Tobacco	User 4	4 653.43	
	19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating	Area 6 To	obacco User/Non-Tobacco	User 4	8 764.75	841.23
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating	Area 6 To	obacco User/Non-Tobacco	User 5	913.02	1004.32
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco		4 998.6 ⁻ 5 1043.0 ⁵	
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco	User 6	1 1314.34	
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010007 Rating 19702PA0010007 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010007 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating	Area 6 T	obacco User/Non-Tobacco		9 424.10	
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating	Area 6 To	obacco User/Non-Tobacco	User 3	6 554.34	609.77
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating	Area 6 To	obacco User/Non-Tobacco	User 4	1 586.79	645.47
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating	Area 6 To	obacco User/Non-Tobacco	User 4	5 650.79	715.87
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco	User 4	9 768.87	845.76
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating	Area 6	obacco User/Non-Tobacco		3 919.40	1011.34
	19702PA0010008 Rating	Area 6 To	obacco User/Non-Tobacco	User 5	4 962.2	1 1058.43
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating	Area 6 To	obacco User/Non-Tobacco	User 5	8 1148.35	1263.19
	19702PA0010008 Rating 19702PA0010008 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating	Area 6 To	obacco User/Non-Tobacco	User 6	2 1294.82	1424.30
	19702PA0010008 Rating		obacco User/Non-Tobacco			
	19702PA0010008 Rating 19702PA0010009 Rating		obacco User/Non-Tobacco obacco User/Non-Tobacco			
ē.	19702PA0010009 Rating		obacco User/Non-Tobacco		5 374.20	
	9	Area 6 T	obacco User/Non-Tobacco	User 1	6 385.88	385.88
	19702PA0010009 Rating	Aron 6 T	obacco User/Non-Tobacco		7 397.56 8 410.13	
	19702PA0010009 Rating		ohacco User/Non Tohacco	0001	410.1	
		Area 6 To	obacco User/Non-Tobacco obacco User/Non-Tobacco	User 1	9 422.7	722
	19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating	Area 6 To a control of the	obacco User/Non-Tobacco obacco User/Non-Tobacco	User 2	0 435.74	435.74
	19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating	Area 6 To Area 6 To Area 6 To Area 6 To	Tobacco User/Non-Tobacco Tobacco User/Non-Tobacco Tobacco User/Non-Tobacco	User 2 User 2	0 435.7 ² 1 449.22	4 435.74 2 494.14
	19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating	Area 6 To	Tobacco User/Non-Tobacco Tobacco User/Non-Tobacco Tobacco User/Non-Tobacco Tobacco User/Non-Tobacco Tobacco User/Non-Tobacco	User 2 User 2 User 2	0 435.74 1 449.22 2 449.23	4 435.74 2 494.14 2 494.14
	19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating	Area 6 To	Tobacco User/Non-Tobacco Tobacco User/Non-Tobacco Tobacco User/Non-Tobacco	User 2 User 2 User 2 User 2	0 435.74 1 449.22 2 449.23 3 449.23	4 435.74 2 494.14 2 494.14 2 494.14
	19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating	Area 6 To Area 6	Tobacco User/Non-Tobacco	User 2	0 435.74 1 449.22 2 449.23 3 449.23 4 449.23 5 451.0	4 435.74 2 494.14 2 494.14 2 494.14 2 496.11
	19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating 19702PA0010009 Rating	Area 6 To Area 6	Tobacco User/Non-Tobacco	User 2 User 2	0 435.74 1 449.22 2 449.23 3 449.22 4 449.22 5 451.0 6 460.00	4 435.74 2 494.14 2 494.14 2 494.14 2 494.14 1 496.11 506.00

19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 30 509.86 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 31 520.64 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 32 531.42 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 32 531.42 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 33 538.16 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 34 545.35 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 35 548.94 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 36 552.54 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 36 552.54 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 37 556.13 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 38 559.72 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 40 574.10 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 40 574.10 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 41 584.88 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 607.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rati	552.94 560.85 572.70 584.56 591.98 599.89 603.83 607.79 611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53 921.57
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 31 520.64 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 32 531.42 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 33 538.16 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 34 545.35 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 35 548.94 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 36 552.54 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 37 556.13 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 38 559.72 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 40 574.10 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 41 584.88 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010000 Rating Area 6 Tobacco User/Non-Tobacco User 52 8	572.70 584.56 591.98 599.89 603.83 607.79 611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 31 520.64 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 32 531.42 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 33 538.16 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 34 545.35 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 35 548.94 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 36 552.54 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 37 556.13 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 38 559.72 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 40 574.10 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 41 584.88 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010000 Rating Area 6 Tobacco User/Non-Tobacco User 52 8	572.70 584.56 591.98 599.89 603.83 607.79 611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6	584.56 591.98 599.89 603.83 607.79 611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6	591.98 599.89 603.83 607.79 611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 45 46 673.82 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 51 837.79	599.89 603.83 607.79 611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 38 559.72 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 40 574.10 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 41 584.88 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 52 876.87	603.83 607.79 611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 38 559.72 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 40 574.10 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 41 584.88 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 52 876.87	603.83 607.79 611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 52 876.87	607.79 611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 19704PA010009 Rating Area 6 19704PA0010009 Rating Area 6 10bacco User/Non-Tobacco User 48 19704PA0010009 Rating Area 6 19704PA00	611.74 615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 40 574.10 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 41 584.88 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 39 566.91 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 40 574.10 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 41 584.88 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	615.69 623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 1000000000000000000000000000000000000	623.60 631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 40 574.10 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 41 584.88 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	631.51 643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 41 584.88 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	643.37 654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 42 595.21 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	654.73 670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 43 609.59 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	670.55 690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 44 627.55 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	690.31 713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 45 648.67 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	713.54 741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 46 673.82 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	741.20 772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 47 702.12 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	772.33 807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 48 734.47 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	807.92 843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 49 766.36 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	843.00 882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 50 802.30 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	882.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 51 837.79 19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 52 876.87	921.57
	964.56
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 53 916.40	1008.04
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 54 959.08	1054.99
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 55 1001.75	1101.93
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 56 1048.02	1152.82
	1204.21
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 58 1144.60	1259.06
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 59 1169.31	1286.24
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 60 1219.17	1341.09
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 61 1262.30	1388.53
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 62 1290.60	1419.66
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 63 1326.08	1458.69
19702PA0010009 Rating Area 6 Tobacco User/Non-Tobacco User 64 and over 1347.65	1482.42
g	
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 0-14 271.74	271.74
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 15 295.90	295.90
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 16 305.13	305.13
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 17 314.37	314.37
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 18 324.32	324.32
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 19 334.26	334.26
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 20 344.56	344.56
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 21 355.22	390.74
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 22 355.22	390.74
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 23 355.22	390.74
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 24 355.22	390.74
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 25 356.64	392.30
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 26 363.75	400.13
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 27 372.27	409.50
	424.73
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 29 397.49	437.24
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 30 403.17	443.49
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 31 411.70	452.87
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 32 420.23	462.25
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 33 425.55	468.11
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 34 431.24	474.36
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 35 434.08	477.49
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 36 436.92	480.61
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 37 439.76	483.74
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 38 442.60	486.86
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 39 448.29	493.12
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 40 453.97	499.37
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 41 462.50	508.75
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 42 470.67	517.74
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 43 482.03	530.23
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 44 496.24	545.86
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 45 512.94	564.23
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 46 532.83	586.11
	610.73
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 48 580.78	638.86
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 49 606.01	666.61
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 50 634.42	697.86
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 51 662.49	728.74
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 52 693.39	762.73
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 53 724.65	797.12
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 54 758.40	834.24
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 55 792.14	871.35
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 56 828.73	911.60
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 57 865.67	952.24
	995.61
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 59 924.64	1017.10
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 60 964.07	1060.48
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 61 998.17	1097.99
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 62 1020.55	1122.61
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 63 1048.61	1153.47
19702PA0010003 Rating Area 6 Tobacco User/Non-Tobacco User 64 and over 1065.66	1172.23
1000.00	1112.20

Unique Plan Design Supporting Documentation and Justification

HIOS Issuer ID: 19702

HIOS Product IDS: 19702PA001

Applicable HIOS Plan IDs (standard Component): 19702PA0010004, 19702PA0010005,

19702PA0010006, 19702PA0010007, 19702PA0010008, 19702PA0010009

Reasons the plan design is unique, that is, the reason benefits are incompatible with the parameters of the Actuarial Value Calculator (AVC) and their materiality:

JHP is offering two generic drug tiers across select plans, a preferred generic and a non-preferred generic. In the Federal AVC, an effective copay was input to reflect these two tiers. Given JHP does not have experience data, an assumed utilization split was calculated using Wakely's proprietary database of nationally-representative ACA data. This was then applied to the corresponding copays to develop the effective generic copay.

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

156.135(b)(2) was used for the generic drug copay adjustment.

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

We confirm that only in-network cost sharing, including multitier networks, was considered.

Description of the standardized plan population data used:

Wakely's proprietary database of nationally-representative Individual ACA data was used to calculate the utilization split between the two generic tiers. We did not adjust the backing continuance tables.

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:

Generic Drug Copay Differential

On the following plans, JHP intends to offer two generic drug tiers with different copay amounts. For purposes of fitting this plan design into the Federal AVC, the two copay amounts were weighted by a projected utilization split to arrive at an effective copay for the AV input. Wakely's proprietary ACA data indicates that the Tier 1/Tier 2 generic utilization split based on an analysis using JHP's proposed formulary was 35%/65%. Results were rounded to the nearest dollar.

Any plans not included in the exhibit below only have one Generic drug Tier.

		Member Cost Sharing								
Plan HIOS ID	Preferred Generic (Tier 1)	Generic (Tier 2)	AV Input							
19702PA0010004	\$10	\$30	\$23.00							
19702PA0010004-04	\$10	\$30	\$23.00							
19702PA0010004-05	\$0	\$10	\$6.50							
19702PA0010005	\$5	\$20	\$14.75							
19702PA0010005-04	\$5	\$20	\$14.75							
19702PA0010005-05	\$0	\$10	\$6.50							
19702PA0010006	\$5	\$20	\$14.75							
19702PA0010006-04	\$5	\$20	\$14.75							
19702PA0010006-05	\$0	\$10	\$6.50							
19702PA0010007	\$0	\$20	\$13.00							
19702PA0010008	\$0	\$20	\$13.00							
19702PA0010009	\$0	\$20	\$13.00							

Below is a summary of the adjustment methodology used for each plan. On/off-exchange variants are not detailed because the methodology is identical for the on/off-exchange variants of the same plan ID. The far-right column is reflective of the input in column I of Table 10 of the PAAM exhibits for the non-CSR variant plans.

Plan ID	Approach 1?	AV Input for Table 10
19702PA0010001	N	Standard AV
19702PA0010002	N	Standard AV
19702PA0010003	N	Standard AV
19702PA0010004	Υ	Approach 1
19702PA0010004-04	Υ	Approach 1
19702PA0010004-05	Υ	Approach 1
19702PA0010004-06	N	Standard AV
19702PA0010005	Υ	Approach 1
19702PA0010005-04	Υ	Approach 1
19702PA0010005-05	Υ	Approach 1
19702PA0010005-06	N	Standard AV
19702PA0010006	Υ	Approach 1
19702PA0010006-04	Υ	Approach 1
19702PA0010006-05	Υ	Approach 1
19702PA0010006-06	N	Standard AV
19702PA0010007	Y	Approach 1
19702PA0010008	Υ	Approach 1
19702PA0010009	Υ	Approach 1

Certification Language:

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

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 methods.

The following pages show the screenshots from the Federal AV calculator of the plan designs. We have only included one screenshot for each respective plan design, with the applicable PLAN IDs listed.

As described above, we made unique plan design adjustments per 156.135(b)(3) to split out plans with two tiers. Screenshots for each tier have been provided for those plans.

[REDACTED]



June 18, 2024

Michael Gurgiolo Pennsylvania Insurance Department

RE: Jefferson Health Plans NAIC Company ID#: 17416

OBJECTION LETTER FOR 2025 INDIVIDUAL PLAN RATES

PICI-134098077

Dear Mr. Gurgiolo,

This submission contains the requested responses to the objection letter received on June 5th, 2024.

There are a few items identified in this round of rate review that will affect either premium rates or supporting documentation submitted with the initial filing on May 15th. Wakely intends to resubmit filing materials with the appropriate assumption updates in the July 17th filing, unless requested by the PID sooner.

Several items contained in the responses are considered TRADE SECRET as they contain proprietary information related to JHP and Wakely Consulting Group (Wakely). TRADE SECRET information includes the following but is not limited to: assumptions developed based on Wakely proprietary data and assumptions and methodologies that could provide insight into JHP's pricing strategy. Only allowable redactions per Pennsylvania Insurance Department's 2025 rate filing guidance have been removed from the public version of this document. A corresponding redaction justification has been submitted along with this response.

Sincerely,

[REDACTED]

Date: June 18, 2024



June 18, 2024

Michael Gurgiolo Pennsylvania Insurance Department

RE: OBJECTION LETTER FOR JEFFERSON HEALTH PLANS, 2025 INDIVIDUAL PLAN RATES, PICI-134098077

Below are our responses on behalf of the Jefferson Health Plan's Objection letter dated June 6th, 2024. These objections pertain to JHP's 2025 individual rate filing. Any references to Excel exhibits can be found within the file "19702_JHP Objection Exhibits 2024.06.19 REDACTED.xlsx" accompanying this response.

Several items contained in the responses are considered TRADE SECRET as they contain proprietary information related to JHP and Wakely Consulting Group (Wakely). A separate actuarial memorandum was submitted and deemed PUBLIC which excluded all information determined to be confidential, according to PID guidance. Per PID instruction, a public version of this document has been uploaded with this response, along with a redaction justification document and cover letter.

There are a few items identified in this round of rate review that will affect either premium rates or supporting documentation submitted with the initial filing on May 15th. Wakely intends to resubmit filing materials with the appropriate updates to premium rates and supporting documentation in the July 17th filing, unless requested by PID sooner. All exhibits within this response are associated with the filing premium rates and supporting documentation from the initial May 15th filing, unless otherwise noted in the response.

Objection 1:

Please provide quantitative and qualitative support for the each of the trend components shown in Table 3b, which result in the trend utilized in the Table 5 rate development. Clarify whether any of the trends show reflect 3 years of trend spread over a two year period in order to facilitate use of the PAAME exhibits.

Objection 1: Wakely's Response

The trends shown in table 3b are carrier reported prospective 2022 to 2024 trend rates from Worksheet 1 of the 2024 PA individual URRTs. These are 3-year trends that we have adjusted to be on an annual 2-year trend basis, per the PAAME instructions. Please see tab "Obj 1" for the formulas used to convert the annual 3-year trend into an annual 2-year trend.



Objection 2:

Please provide Appendices B through E in Excel format, with formulas intact.

Objection 2: Wakely's Response

Please see the associated exhibits file, tabs "Obj 2b" – "Obj 2e" for Appendices B, D and E with formulas. The buildup for Appendix C is shown on tab "Obj 12" in response to Objection 12.

The change in demographic factor, which is part of the allowed claim cost adjustment, relies on Wakely proprietary ACA data. We have provided the exhibit on tab "Obj 2b" for illustrative support of the factors. We sent the exhibits with pricing values containing proprietary data directly to PID via email. Please see Objection 15 for more support on the change in demographic factor.

Objection 3:

Please provide the quantitative development and sources of data, as necessary, for all other factors and adjustments in steps 1-9 of Appendix D. This information should be provided in an Excel file with working formulas with explanations, support, source of data, etc. provided for any hard-coded values, and support should also be provided for how these adjustments tie to the values provided in Table 5 of the PA Rate Template.

Objection 3: Wakely's Response

The majority of these values are provided within other objection responses in the associated workbook. Please see the list below for the applicable tab for each step calculation. On the "Obj 2e" tab, which shows Appendix E with live formulas, we have linked up to the listed tabs.

- Step 1: Please see the associated exhibits file, tab "Obj 3"
- Step 2: Please see the associated exhibits file, tab "Obi 2b"
- Step 3: Please see the associated exhibits file, tab "Obj 2b"
- Step 4: Further support can be found in Objection 19.
- Step 5a-5c: Please see the associated exhibits file, tab "Obj 1"
- Step 6: Please see the associated exhibits file, tab "Obj 8"
- Step 8: Please see the associated exhibits file, tab "Obj 3"

Objection 4:

The Non-Funding of CSR Adjustment factor applied to on-exchange silver plans is 1.22 for PIC and 1.30 for HPP. What is the rationale for having differing factors for PPO and HMO business, i.e. what are the differences between the product types, service areas, expected insured demographics, and/or other factors that would indicate that differing adjustment factors are appropriate?

Objection 4: Wakely's Response

There are a few reasons why JHP believes it is justified to offer different CSR Adjustment factors for the PPO and HMO business.



- 1. CSR enrollment is typically a function of silver premium competitiveness. Plans with low silver premiums, which could be free or heavily subsidized through APTC for low-income members, tend to enroll those who are eligible for 87% and 94% CSR subsidies as well. HPP offers lean HMO plans which are expected to be on par with other low silver competitors in the market, so it is anticipated that HPP will enroll a higher proportion of 87% and 94% members (who would receive both premium and CSR subsidies) relative to an equivalent higher premium silver plan. The 1.30 factor is intended to cover the cost of enrolling more 87% and 94% members than the average market. PIC offers PPO products, which are not anticipated to be as attractive of an option to low-income members due to the higher monthly net premium after APTC. Wakely determined that a 1.22 load was sufficient to cover the anticipated mix of CSR members for the PPO product.
- 2. Even under the same CSR distribution, the effective CSR load will be lower for a product with a higher base 70% AV (the PPO product) relative to a product with a lower base 70% AV. This is the case for the PPO and HMO products as we anticipate members will hit their deductibles and MOOPs faster in regions with higher costs.

See the illustrative example below. Even if JHP assumed the membership amongst the CSR variants were identical for HMO and PPO, the CSR load for HMO would be higher than that of the PPO product purely as a function of the lower starting point.

Silver CSR	Distribution	HMO AV	PPO AV
Silver 70%	20%	68%	72%
Silver 73%	25%	72%	76%
Silver 87%	30%	85%	89%
Silver 94%	25%	93%	97%

(a) Base 70 AV	68%	72%
(b) Average AV	80%	84%
(c) CSR Load = (b) / (a) -1	18.2%	17.2%

Objection 5:

The total Administrative Expenses percentage and PMPM amount as shown in Table 6 is not consistent with figures cited in the actuarial memorandum. Please review and revise as appropriate, and note that the PID is not prescribing a fixed administrative expense percentage; a fixed PMPM for all plans is also acceptable.

Objection 5: Wakely's Response

The total Administrative Expenses shown in cell C62 of Table 6 includes general admin expenses, taxes and fees, and profit for a total of 7%. In the actuarial memorandum we separate these components from each other and record administrative expenses exclusive of



taxes/fees and profit which equates to cell C49 of Table 6 (6.8%). On a PMPM basis, administrative expenses (inclusive of commissions) are \$55.00 PMPM, which differs from the sum of cells D50:D52 of Table 6 of (\$55.21) due to rounding only. The actual administrative expense used in the development of premium rates was \$55.00 PMPM.

Objection 6:

Please verify that the projected premium shown in the MLR development exhibit matches the Required Revenue shown in Table 6 of the PAAME, or explain the reason for any differential.

Objection 6: Wakely's Response

We are not finding an MLR development exhibit from our filing that includes projected premium information. Please clarify which exhibit this question is referring to.

Objection 7:

A statement referencing ongoing reimbursement negotiations with providers is included in the actuarial memorandum. I note that this statement was also included in last year's HPP filing; please clarify the significance of this statement and discuss how this uncertainty impacted the rates for 2024 as well as the potential impact on 2025 rates.

Objection 7: Wakely's Response

[REDACTED]

Objection 8:

Please provide in Excel format a detailed numerical development of the Change in Network adjustment factor as shown in cell D19 of Table 5, with formulas intact, including the impact of the greater proportion of out-of-network claims for the company relative to the market as well as the company's referenced in-network cost-sharing tiers, relative to market averages.

Objection 8: Wakely's Response

[REDACTED]

Objection 9:

Please verify the statement that there have been no changes in EHBs and state-mandated benefits since 2022.

Objection 9: Wakely's Response

According to our understanding of the information on CMS's website, there have been no changes in EHBs and state-mandated benefits in Pennsylvania since 2022. Please clarify if this is not the case.



Objection 10:

Please verify that the trend shown in Table 1b, the Rate Change Summary and the actuarial memorandum are consistent, or indicate why this should not be the case.

Objection 10: Wakely's Response

The trends utilized in all three places are consistent. However, the trends shown in the PAAM exhibits are on a 2-year basis and the annual trend in the actuarial memorandum are on a 3-year basis so they may appear different. Please see exhibit 1 for the reconciliation of the 2-year trends to the 3-year trends.

Objection 11:

Please reconcile the figures shown the How It Plans To Spend Your Money box in Table 15 with the percentages shown in Table 6.

Objection 11: Wakely's Response

Profit ties exactly between table 15 and table 6. The difference between the Taxes & Fees is driven by the fact table 15 included the exchange fee and table 6 is exclusive of the exchange fee. If the exchange fee percentage is added to the taxes and fees in Table 6, then the total will tie with Table 15. The total administrative expense is consistent across the two sources, however, the sum of the administrative components is slightly off due to rounding, as mentioned in response to Objection 5.

Objection 12:

Please provide additional quantitative support for the development of the projected 2024 risk transfer receipt. This exhibit should provide the support and detail for all factors and adjustments applied in Appendix C for each metal level, and should also provide the development of the high-cost risk pool adjustment.

Objection 12: Wakely's Response

[REDACTED]

Objection 13:

Please provide an exhibit showing the numerical development of the Exchange User Fee amount shown in cell C32 of Table 5 of the PAAME, including support for the anticipated mix of on-exchange and off-exchange issues for the rating period.

Objection 13: Wakely's Response

Please see the "Obj 13" tab for the calculation of the Exchange User Fee amount shown in cell C32 of Table 5.



Objection 14:

Please provide the rationale for the direction and magnitude of the differences between the pricing AVs and the metal AVs for each plan included in the 'III Plan Rates' tab of the PA Rate Template.

Objection 14: Wakely's Response

The Federal AV calculator and our internal Pricing AV calculator utilize varying methodologies, assumptions, and backing data. While the Federal AV calculator is much more simplistic and only accounts for a few services, our Pricing AV calculator has a more robust listing of service categories, with more detailed continuance tables backing the AV calculations. Also, while the Federal AV calculator has one set of national backing data regardless of state or market, our internal model has the ability to vary the data underlying the model based on costs we actually believe to exist in that market. For these reasons, there is variation by plan between the two models.

Further, the average allowed costs underlying our Pricing AV calculator are higher than the average costs assumed in the Federal AV calculator, which translates to higher Pricing AVs compared to Federal AVs all else equal. The costs underlying the Pricing AV calculator are intended to represent JHP's estimated PPO product claims.

Objection 15:

Please provide in Excel format a detailed numerical development of the Change in Demographics adjustment factor of 1.259 as shown in cell D18 of Table 5, breaking out each factor indicated below, with formulas intact. I note that this factor includes an adjustment to account for differences between (1) the manual enrollment mix by rating area and the company's expected enrollment mix by rating area, as well as for differences between the manual enrollment mix by (2) age band and (3) metal and the company's expected enrollment mix by age band and metal.

Objection 15: Wakely's Response

The support for this objection has been emailed directly to PID as it contains confidential information.

Objection 16:

Please provide a further explanation and calculation of the methodology used to determine the override amount shown in cell C28 of Table 5, as opposed to using the value shown in cell K15 of Table 10.

Objection 16: Wakely's Response

Wakely's development of the average AV relies on weighting both by projected membership and benefit richness. The AV calculated in K15 of Table 10 weights by only the covered lives as of



2/1/2024. Please see the "Obj 16" tab for the calculation of the override amount shown in cell C28 of Table 5.

Objection 17:

Please provide a breakout for the number of members with silver plans incorporating a CSR load who enrolled in coverage on-exchange vs. off-exchange as of February 1, 2024.

Objection 17: Wakely's Response

2025 is the first year JHP will be offering a PPO product therefore there is no membership as of 2/1/2024.

Objection 18:

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

Objection 18: Wakely's Response

Confirmed testing for identical rates among the three filing forms. The discrepancy in rates from Table 11 PAAME is a result of rounding within an earlier step. Please see the "Obj 18" tab for an example of these rates.

Objection 19:

Please provide further justification for the assumed Covid-19 adjustment factors, identifying and quantifying the considerations and components that result in the final assumed adjustment factor.

Objection 19: Wakely's Response

[REDACTED]

Objection 20:

Please describe the extent to which these PPO rates are derived from the HPP rates and assumptions and methodology. What are the differences between these two blocks, aside from the specific plans, provider networks and service areas, and provider networks, and how are such differences quantified?

Objection 20: Wakely's Response

Neither of JHP's ACA products have base period experience. Therefore, the starting point of the manual data is consistent between the two filings. The manual rating methodologies remain



consistent between the products, with variation of assumptions and incorporation of HMO emerging experience, where possible.

The primary differences between the PPO and HMO rates are the plan richness (AV), corresponding IU, network (OON benefit offerings), and geographic region to be covered. Those are quantified via the AV, IU, provider contract factor, network factors and geographic factors.

The other underlying assumption differences between the two blocks is the membership mix to be enrolled in terms of metal, CSR, age, and morbidity. Whereas the HMO has emerging experience to glean mix from, the PPO product does not, and therefore a metal and age mix consistent with market was selected. These differences are quantified using the methodology described in the memorandum for the CSR load, allowed claim cost adjustment and risk decrement adjustment, but calculated using a different mix of membership by metal and age than the HMO product.

Objection 21:

Please clarify why the company has not included PA premium tax of 2% in its rate development, in cell C56 of Table 6. Note that only HMOs are exempt from paying the PA premium tax.

Objection 21: Wakely's Response

JHP did not realize only HMOs are exempt from paying the PA premium tax. The premium rates will be revised to include the premium tax for the July 17th refilling, unless requested by PID sooner.

Objection 22:

Please verify that the Retention Items section of the PA Actuarial Memorandum matches the 'II Rate Development & Change' tab of the PA Rate Template, or make any necessary corrections to the memorandum.

Objection 22: Wakely's Response

Please see Objection 11 response.

Please let us know if you would like to discuss.

Sincerely,

[REDACTED]

Trend Components

Trend Category	Service Group	3 Year Annual Trend	Convert to 2 Year Annual Trend
Unit Cost	Inpatient Hospital	4.87%	7.39%
Unit Cost	Outpatient Hospital	3.11%	4.70%
Unit Cost	Professional	4.44%	6.73%
Unit Cost	Prescription Drugs	8.61%	13.19%
Unit Cost	Total	5.01%	7.60%
Utilization	Inpatient Hospital	0.00%	0.00%
Utilization	Outpatient Hospital	1.72%	2.60%
Utilization	Professional	1.89%	2.85%
Utilization	Prescription Drugs	1.63%	2.45%
Utilization	Total	1.44%	2.16%
Total	Total	6.56%	10.00%

Development of Single Risk Pool Adjustment Factor

Change in Demographic Fato

Allowed PMPM from Wakely Proprietary ACA Data										
Catastrophic Bronze Bronze Zero Bronze Limited Silver 70% Silver 75% Silver 87% Silver 84% Gold Platinum										
Age 0 17	\$171.85	\$105.54	\$106.54	\$106.54	\$209.38	\$167.94	\$189.87	\$146.83	\$246.96	\$498.32
Age_18.25	\$150.77	\$100.92	\$100.92	\$100.92	\$257.26	\$25.35	\$179.67	\$165.40	\$244.30	\$440.61
Apr. 26.34	\$133.30	\$132.63	\$132.63	\$132.63	\$393.53	\$42.91	\$299.28	\$288.22	\$410.22	\$1,122.54
Ago 25,44	\$375.25	\$170.16	\$170.16	\$170.16	\$447.09	\$74.07	\$373.60	\$368.97	\$471.66	\$1,147.96
Apr. 45.54	\$348.01	\$245.25	\$246.25	\$246.25	\$593.10	\$125.49	\$499.21	\$516.97	\$605.62	\$1,330.58
Age_55_64	\$483.82	\$430.15	\$430.15	\$430.15	\$836.22	\$205.14	\$758.08	\$733.10	\$862.51	\$1,665.41
Age_GE65	\$422.74	\$482.59	\$482.59	\$482.59	\$1,145.98	\$252.63	\$850.90	\$798.27	\$1,258.43	\$2,403.09

Platinum	Catastrophic	Bronze	Bronze	Bro
\$1,330.58 \$1,665.41 \$2,403.09			Allustrate the	build
\$1,147.96			maintain the have used at	

PA Individual Statewide 2022										
	Catastrophic	Bronze	Bronze Zero	Bronze Limited	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Gold	Platinum
Metal Mix	0%	24%	0%	0%	7%	5%	15%	14%	35%	0%
Age_0_17	6%	6%	6%	6%	5%	5%	5%	5%	6%	6%
Age_18_25	7%	7%	7%	7%	7%	7%	7%	7%	6%	6%
Apr. 26.34	17%	17%	17%	17%	16%	16%	35%	16%	14%	14%
Apr.35,44	15%	15%	15%	15%	17%	17%	17%	17%	14%	14%
Apr.,45,54	18%	28%	18%	18%	20%	20%	20%	20%	17%	17%
Apr.55,64	35%	35%	35%	35%	34%	34%	34%	34%	41%	41%
Age_GE55	1%	2%	2%	1%	2%	2%	2%	2%	1%	1%

	PA Individual Statewide 2022								
Catastrophic	Bronze	Bronze Zero	Bronze Limited	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Gold	Platinum
\$0.05	\$1.58	\$0.00	\$0.00	\$0.68	\$0.40	\$1.38	\$0.99	\$5.33	\$0.0
\$0.05	\$1.74	\$0.00	\$0.00	\$1.17	\$0.05	\$1.84	\$1.58	\$5.27	\$0.0
\$0.10	\$5.48	\$0.00	\$0.00	\$4.16	\$0.33	\$7.09	\$6.36	\$20.37	\$0.0
\$0.25	\$6.21	\$0.00	\$0.00	\$5.02	\$0.60	\$9.41	\$8.66	\$23.42	\$0.0
\$0.27	\$10.76	\$0.00	\$0.00	\$7.84	\$1.21	\$14.81	\$14.30	\$36.45	\$0.0
\$0.74	\$36.42	\$0.00	\$0.00	\$18.86	\$3.35	\$38.33	\$34.57	\$124.58	\$0.0
\$0.02	\$1.33	\$0.00	\$0.00	\$1.42	\$0.23	\$2.36	\$2.06	\$5.05	\$0.0

djustment Factors

Base Pariod Period Adjustment
PMPM Period Factor
embership Mit Adjustment \$474.51 \$484.97 0.9720



PA Individual JHP Projected 2025										
	Catastrophic	Bronze	Bronze Zero	Bronze Limited	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Gold	Platinum
Metal Mix	0%	24%	0%	0%	6%	4%	13%	16%	37%	01
Age_0_17	0%	7%	0%	0%	6%	6%	6%	616	7%	01
Age_18_25	0%	7%	0%	0%	8%	8%	8%	816	7%	01
Age 26,34	0%	17%	0%	0%	16%	16%	35%	16%	15%	0%
Age 35,44	0%	35%	0%	0%	18%	18%	18%	18%	15%	0%
Age_45_54	0%	17%	0%	0%	19%	19%	22%	19%	17%	0%
Age 55,54	0%	34%	0%	0%	30%	30%	30%	30%	37%	01

			PA	Individual JHI	Projected 28	25			
Catastrophic	Bronze	Bronze Zero	Bronze Limited	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Gold	Platinum
\$0.00	\$1.84	\$0.00	\$0.00	\$0.78	\$0.40	\$1.54	\$1.43	\$6.51	\$0.00
\$0.00	\$1.74	\$0.00	\$0.00	\$1.28	\$0.05	\$1.93	\$2.13	\$6.44	\$0.00
\$0.00	\$5.49	\$0.00	\$0.00	\$3.88	\$0.27	\$6.36	\$7.37	\$22.93	\$0.00
\$0.00	\$6.64	\$0.00	\$0.00	\$4.95	\$0.51	\$8.93	\$10.60	\$26.36	\$0.00
\$0.00	\$10.20	\$0.00	\$0.00	\$6.93	\$0.92	\$12.59	\$15.67	\$38.32	\$0.00
\$0.00	\$35.48	\$0.00	\$0.00	\$15.38	\$2.37	\$30.10	\$34.99	\$118.23	\$0.00
\$0.00	\$1.33	\$0.00	\$0.00	\$1.50	\$0.21	\$2.40	\$2.71	\$5.31	\$0.00



Geographic Facto

Rating Area	2023 Statewide Distribution	2023 Interim GCF	HPP 2025 Projected Membership
Rating Area 1	4.7%	0.925	01
Rating Area 2	0.4%	1.285	01
Rating Area 3	8.3%	1.139	01
Rating Area 4	23.1%	0.844	01
Rating Area 5	3.9%	1.015	01
Rating Area G	7.5%	1.251	1001
Rating Area 7	9.6%	1.338	01
Rating Area 8	36.7%	0.978	01
Rating Area 9	5.8%	1.319	01
Total Statewick Factor		1.035	1.25

.....

Method Medical Rx Total
Method 1

Other Adjustments/COVI



Development of 2025 Index Rate

Step	Formula	Description	Statewide PA 2022 URRT
1		Base Period Claims Allowed PMPM, with IBNR, Net of Rx Rebates	\$614.01
2		Allowed Claim Cost and Geographic Adjustment (to JHP Projected Age, Metal, and Risk, in JHP Service Area)	1.259
4		Claims COVID Adjustment	
5a		Average Annual Trend, Medical + Rx	6.6%
5b		Number of Years of Trend	3
5с		Final Trend Adjustment	1.210
6		Provider Contracting	
7	= [1] * [2] * [3] * [4] * [5c] * [6]	2025 Allowed Claim Cost PMPM, Gross of State Based Reinsurance	\$994.35
8		2025 State Based Reinsurance Recovery on an Allowed Basis	(\$45.59)
9	= [7] - [8]	2025 JHP Allowed Claim Cost and Risk Adjustment Transfer and Reinsurance PMPM (Market Adj Index Rate)	\$948.76
10		2025 Paid Risk Adjustment Transfer PMPM	
11		High Cost Risk Pool Fee	
	= [10] + [11]	2025 Risk Adjustment Transfer PMPM Post-HCRP	
13		Projection Period AV	84%
14	= 1 / [13]	Convert Paid to Allowed	1.190
15	= [12] * [14]	2025 Risk Adjustment Component of Allowed Costs	
16	= [9] + [15]	2025 JHP Allowed Claim Cost and Risk Adjustment Transfer and Reinsurance PMPM (Market Adj Index Rate)	
17		Exchange Fee	2.89%
18	= [19] / (1 - [20])	Final Market Adjusted Index Rate	

Development of the Normalization Factors

Geographic Facto

Rating Area	Geographic Factors
Rating Area 6	1.00
Total, Membership Weighted	1.00

Network	Network Factor
Rating Area 6 - PPO	1.000
Total, Membership Weighted	1.000

Age Facto

Age	Age Curve	2024 Projected Age Distribution
0	0.765	0.4%
1	0.765	0.4%
2	0.765	0.4%
3	0.765	0.4%
4	0.765	0.4%
5	0.765	0.4%
6	0.765	0.4%
7	0.765	0.4%
8	0.765	0.4%
9	0.765	0.4%
10	0.765	0.4%
11	0.765	0.4%
12	0.765	0.4%
13	0.765	0.4%
14	0.765	0.4%
15	0.833	0.4%
16	0.859	0.4%
17	0.885	0.4%
18	0.913	0.9%
19	0.941	0.9%
20	0.970	0.9%
21	1.000	0.9%
22	1.000	0.9%
24		0.9%
	1.000	
26	1.024	1.8%
27	1.048	1.8%
28	1.087	1.8%
29	1.119	1.8%
30	1.135	1.8%
31	1.159	1.8%
32	1.183	1.8%
33	1.198	1.8%
34	1.214	1.8%
35	1.222	1.7%
36	1.230	1.7%
37	1.238	1.7%
38	1.246	1.7%
39	1.262	1.7%
40	1.278	1.7%
41	1.302	1.7%
42	1.325	1.7%
43	1.357	1.7%
44	1.397	1.7%
45	1.444	1.8%
46	1.500	1.8%
47	1.563	1.8%
48	1.635	1.8%
49	1.706	1.8%
50	1.786	1.8%
51	1.865	1.8%
52	1.952	1.8%
53	2.040	1.8%
54	2.135	1.8%
55	2.230	3.4%
56	2.333	3.4%
57	2.437	3.4%
58	2.548	3.4%
59	2.603	3.4%
60	2.714	3.4%
61	2.810	3.4%
62	2.873	3.4%
63	2.952	3.4%
64	3.000	3.4%
65+	3.000	1.5%

Tobacco Fact

Age	Age Distribution	Factor
0	0.4%	1.000
1	0.4%	1.000
2	0.4%	1.000
3	0.4%	1.000
4	0.4%	1.000
5	0.4%	1.000
- 6	0.4%	1.000
7	0.4%	1.000
8	0.4%	1.000
10	0.4%	1.000
11	0.4%	1.000
12	0.4%	1.000
13	0.4%	1.000
14	0.4%	1.000
15	0.4%	1.000
16	0.4%	1.000
17	0.4%	1.000
18	0.9%	1.000
19	0.9%	1.000
20	0.9%	1.000
21	0.9%	1.100
23	0.9%	1.100
24	0.9%	1.100
26	1.8%	1.100
27	1.8%	1.100
28	1.8%	1.100
29	1.8%	1.100
30	1.8%	1.100
31	1.8%	1.100
32	1.8%	1.100
34	1.8%	1.100
35	1.7%	1.100
36	1.7%	1.100
37	1.7%	1.100
38	1.7%	1.100
39	1.7%	1.100
40	1.7%	1.100
41	1.7%	1.100
42	1.7%	1.100
44	1.7%	1.100
45	1.7%	1.100
46	1.8%	1.100
47	1.8%	1.100
48	1.8%	1.100
49	1.8%	1.100
50	1.8%	1.100
51	1.8%	1.100
52	1.8%	1.100
53 54	1.8%	1.100
55	3.4%	1.100
56	3.4%	1.100
57	3.4%	1.100
58	3.4%	1.100
59	3.4%	1.100
60	3.4%	1.100
61	3.4%	1.100
62	3.4%	1.100
63 64	3.4%	1.100
65+	3.4%	1.100
65+	1.5%	1.100

bacco		
actor	Component	Value
.000	Tobacco rating factor (for smokers only)	1.090
.000	% of people who can be rated for tobacco	2.69
000	Total rate-up based on admitted tobacco usade	1.000

Development of Step 1 of Appendix E - Base Period Allowed Claims PMPM

Component	Statewide PA 2022 URRT
Base Period Allowed Claims PMPM	\$615.79
Non-EHB Adjustment	1.0029
Step 1 - Base Period Allowed Claims PMPM, Reduced for Non-EHBs	\$614.01

Development of Step 8 of Appendix E - Reinsurance impact

Proj. Incurred Claim Impact: (Cell E7 II.b. Reins Table - Proj tab)	-4.58%
Step 7 of Appendix E (2025 Allowed Claim Cost PMPM)	\$994.35
2025 State Based Reinsurance Recovery on an Allowed Basis	-\$45.59

2024 URRT with 2022 data

				1.0029
HIOS ID	Carrier	Allowed PMPM	Member Months	Non-EHB Factor
13401	Cigna Health and Life Insurance Company	\$432.88	28,393	1.0000
16322	UPMC HEALTH OPTIONS INC.	\$555.02	1,218,438	1.0017
22444	Geisinger Health Plan	\$784.03	200,654	1.0000
31609	QCC Insurance Company, Inc.	\$699.27	436,775	1.0003
33709	Highmark Inc.	\$726.13	620,344	1.0087
33871	Keystone Health Plan East	\$531.69	1,348,764	1.0001
45127	Capital Advantage Assurance Company	\$789.38	623,495	1.0000
53789	Keystone Health Plan Central	\$435.94	5,196	1.0000
62560	UPMC HEALTH COVERAGE INC.	\$878.11	27,450	1.0017
75729	Geisinger Quality Options	\$869.62	51,685	1.0000
79279	Highmark Coverage Advantage	\$390.27	184,994	1.0230
79962	Highmark Benefits Group	\$692.64	222,770	1.0077
86199	Pennsylvania Health & Wellness Inc.	\$256.74	103,006	1.0106
93909	Jefferson Health Plans	\$0.00	-	
98517	Oscar Health Plan of Pennsylvania, Inc.	\$363.71	47,831	1.0000

Development of the Change in Network Factor

[REDACTED]

Reconciliation of Administrative Expenses

Component	Table 6 components	Rate Summary Change Table
General and Claims	3.93%	
Agent/broker Fees and Commissions	1.80%	
Quality improvement Inititatives	0.80%	
Total Administrative expenses	6.53%	6.53%
Taxes and Fees	0.08%	2.78%
Exchange Fee	2.70%	
Total Taxes and fees	2.78%	2.78%
Profit	0.08%	0.08%

Development of the Projected 2025 Risk Transfer Payment

[REDACTED]

Development of the Exchange User Fee PMPM

Adjusted Projected Allowed EHB Claims PMPM	\$ 994.35
Projected Paid to Allowed Ratio	0.840
Projected Incurred EHB Claims PMPM	\$ 835.31
Market-wide Adjustments	
Projected Incurred Risk Adjustment PMPM	
Projected Incurred Exchange User Fees PMPM*	\$23.81
Projected Incurred Reinsurance Recoveries PMPM	\$38.30
Market-Adjusted Projected Incurred EHB Claims PMPM	

 $^{*99.3\%\} of\ projected\ membership\ is\ of f-exchange$

^{**6.53%} is projected total retention

Development of the Projected AV

Cell K15 of Table 10	0.836
Cell K16 of Table 10	0.818
Cell C28 of Table 5 (Wakely Override)	0.840

HIOS Plan ID (Standard Component)	Covered Lives as of 2/1/2024	Projected Membership	Pricing AV (company- determined AV)	Benefit Richness (induced demand)	Non- Funding of CSR Adjustme nt
19702PA0010006	-	65	0.745	1.042	1.220
19702PA0010005	-	65	0.747	1.044	1.220
19702PA0010004	-	65	0.775	1.071	1.220
19702PA0010001	-	40	0.708	0.931	1.000
19702PA0010002	-	40	0.703	0.929	1.000
19702PA0010007	-	62	0.850	1.002	1.000
19702PA0010008	-	62	0.828	0.989	1.000
19702PA0010009	-	62	0.826	0.987	1.000
19702PA0010003	-	40	0.685	0.923	1.000

Development Age 21 Rates Across Filing Forms are Identical

Example for Plan 19702PA0010006, Age 21, Non-Tobacco User

	19702PA0010006	
Data Source	Jefferson Total Silver	
Table 11 PAAM	\$529.78	=III Plan Rates'!\$AA\$18
PA Plan Design Summary and Rate Table	\$529.76	=Rate Table'!\$E\$21
Federal Rate Table/Binder	\$529.76	=Rate Pages'!\$C\$26



July 17, 2024

Michael Gurgiolo Pennsylvania Insurance Department

RE: Jefferson Health Plans NAIC Company ID#: 17416

OBJECTION LETTER FOR 2025 INDIVIDUAL PLAN RATES

PICI-134098077

Dear Mr. Gurgiolo,

This submission contains the requested responses to the objection letter received on July 5th, 2024.

Several items contained in the responses are considered TRADE SECRET as they contain proprietary information related to JHP and Wakely Consulting Group (Wakely). TRADE SECRET information includes the following but is not limited to: assumptions developed based on Wakely proprietary data and assumptions and methodologies that could provide insight into JHP's pricing strategy. Only allowable redactions per Pennsylvania Insurance Department's 2025 rate filing guidance have been removed from the public version of this document. A corresponding redaction justification has been submitted along with this response.

[REDACTED]

Date: July 17, 2024



July 17, 2024

Michael Gurgiolo Pennsylvania Insurance Department

RE: OBJECTION LETTER FOR JEFFERSON HEALTH PLANS, 2025 INDIVIDUAL PLAN RATES, PICI-134098077

Below are our responses on behalf of the Jefferson Health Plan's Objection letter dated July 4th, 2024. These objections pertain to JHP's 2025 individual rate filing. Any references to Excel exhibits can be found within the file "19702_JHP Objection Exhibits_2024.07.17.xlsx" accompanying this response.

Several items contained in the responses are considered TRADE SECRET as they contain proprietary information related to JHP and Wakely Consulting Group (Wakely). A public version of this document has been uploaded with this response, along with a redaction justification document and cover letter, based on information determined to be confidential, according to Pennsylvania Insurance Department (PID) guidance.

With this response, we are also submitting the full set of filing materials to account for the Pennsylvania Insurance Department (PID) revised filing deadline of July 17th, 2024. Changes made in the refiling include the addition of a 2% premium tax. All changes are discussed in the document below and/or updated in the supporting documentation.

Objection 1:

I note that the example provided in your response to Objection 4 demonstrates a differential that would result if metal level distributions were equivalent but AVs were at the high end of the allowable range for one issuer and the low end for the other; this results in a difference of less than 1% applicable to the CSR load. Please provide a demonstration that supports the proposed CSR load differential, which is approximately 6.55%.

Objection 1: Wakely's Response

The difference of less than 1% is representing the differences in plan designs of an HMO and PPO plan.

As mentioned in bullet point 1 of Objection 4, the remaining differential of 6.55% is a result of a difference in distribution of expected membership amongst the silver CSR variants. See response pasted below for reference:

1. CSR enrollment is typically a function of silver premium competitiveness. Plans with low silver premiums, which could be free or low cost for low-income members with high APTC subsidies, tend to enroll a higher proportion of members eligible for 87% and 94% CSR plans. JHP offers lean HMO plans which are expected to be on par with other low silver competitors in the market, so it is anticipated that JHP will enroll a higher proportion of 87% and 94% members (who would receive both premium and CSR subsidies) relative to



an equivalent higher premium silver plan. The 1.30 factor is intended to cover the cost of enrolling more 87% and 94% members than the average market in the HMO product. PIC offers PPO products, which are not anticipated to be as attractive of an option to low-income members due to the higher monthly net premium after APTC. Wakely determined that a 1.22 load was sufficient to cover the anticipated mix of CSR members for the PPO product.

Objection 2:

Please support the assumption of 2 percentage point lower proportion of business with HCCs, identical to the HMO business, given the PPO rate level and the rationale provided for the HMO assumption. Discuss how this consideration is or is not already accounted for via the Benefit Richness factor, and indicate the extent to which the claims reduction and increase in the expected risk adjustment payment offset.

Objection 2: Wakely's Response

[REDACTED]

Morbidity is not included in the benefit richness factor.

Objection 3:

Regarding Objection 8, the supporting exhibit assumes that 80% of allowed claims will be innetwork, which is below the statewide average. Please indicate how this differential was determined based on HPP data, the statewide, and other sources the statewide average, as well as how the company's assumptions consider that statewide data also includes PPO business.

Objection 3: Wakely's Response

[REDACTED]

Objection 4:

For Objection 13, the footnote of the supporting exhibit reads that 99.3% of business is off-exchange. Please verify or revise.

Objection 4: Wakely's Response

This was an error in the exhibit for Objection 13. We are revising to state that 90.0% of business is on-exchange. Please see the "Obj 4" tab for the updated exhibit.

Objection 5:

Regarding Objection 17, please provide projected silver enrollment by CSR variant.

Objection 5: Wakely's Response



Please see the "Obj 5" tab for the projected silver enrollment by CSR variant.

Objection 6:

Objection 19 indicates that a 0.6% COVID-19 reduction results from reduced inpatient admits in 2025 compared to 2022, and 0.7% results from reduced testing costs. No adjustment is made for care that may have been deferred in 2022 that is no longer being deferred in 2025. Please discuss the possibility of care being deferred in 2022, given the assumption that COVID-19 was resulting in higher hospital admits in 2022, compared to utilization reaching post-pandemic levels in 2025.

Objection 6: Wakely's Response

[REDACTED]

Objection 7:

Objection 20 requested a quantification of the differences in expected claims and rates between the PPO and HMO blocks. The company states that they are rated consistently; please provide an exhibit that quantifies each aspect of this differences in Area 6, where both products are offered, i.e. what is driving the differences in expected rate levels including the cited differences in AV/IU, provider contract factor, network factor, metal mix, CSR, age, morbidity, and any other factors that differentiate the rate levels of the PPO and HMO blocks in Area 6.

Objection 7: Wakely's Response

Please see the "Obj 7" tab for the exhibit displaying the estimated differences in average AV/IU, provider contract factor, network factor, metal mix, CSR, age, morbidity, and other factors that differentiate the rate levels of the PPO and HMO blocks in Area 6. The comment that they are rated consistently was referring to overall methodology, to the extent the development makes sense for both products, i.e., the starting base period claims, adjusting from the URRT data to the estimated projected mix, geographic factor development, risk adjustment transfer calculation, etc. This does not refer to the pricing factor assumptions being consistent.

Please let us know if there is an area of particular confusion with the rating differences.

Objection 8:

Please clarify the basis of the medical provider contracting factor in the Single Risk Pool Adjustment Factor exhibit previously provided.

Objection 8: Wakely's Response

[REDACTED]

Please let us know if you would like to discuss.

Sincerely,



[REDACTED]

Development of the Exchange User Fee PMPM

Adjusted Projected Allowed EHB Claims PMPM	\$ 994.35
Projected Paid to Allowed Ratio	0.840
Projected Incurred EHB Claims PMPM	\$ 835.31
Market-wide Adjustments	
Projected Incurred Risk Adjustment PMPM	
Projected Incurred Exchange User Fees PMPM*	\$22.71
Projected Incurred Reinsurance Recoveries PMPM	\$38.30
Market-Adjusted Projected Incurred EHB Claims PMPM	

^{*90%} of projected membership is on-exchange

^{**6.53%} is projected total retention

Projected Silver CSR Members by Variant

	Silver 70%	Silver 73%	Silver 87%	Silver 94%	Total
Total	366	231	789	951	2,337

PPO vs HMO Quantification of Differences

	нмо	PPO
Average AV/IU	0.775	0.840
Provider Contract Factor Relative to Statewide Market		
Network Factor	1.000	1.000
Metal Mix		
Bronze	20.77%	24.15%
Silver 70%	1.09%	6.10%
Silver 73%	1.74%	3.85%
Silver 87%	10.55%	13.15%
Silver 94%	42.06%	15.85%
Gold	23.80%	36.90%
CSR Load	1.300	1.220
Average Age	48.5	49.9
Morbidity	1.000	1.000

Trend	1.202	1.210
Premium Tax	0%	2%

- Additional Comments:

 1. AV: The PPO plans are richer than the HMO plans driving a higher average AV and subsequent IU

 2. Provider Contracting; HMO is blended with Rating Area 8 that has largely different reinbursement rates than Rating Area 6

 3. CSR: Emerging HMO experience has a larger percentage of silver 94% members. We do not expect this to be consistant with the PPO plans due to the nature of the plan type therefore we have set the PPO to the low end of the range 4. Taxes and Fees: HMO is exempt from the premium tax, therfore it is only applied to the PPO plans.



July 31, 2024

Michael Gurgiolo Pennsylvania Insurance Department

RE: Jefferson Health Plans
NAIC Company ID#: 17416

OBJECTION LETTER FOR 2025 INDIVIDUAL PLAN RATES

PICI-134098077

Dear Mr. Gurgiolo,

This submission contains the requested responses to the objection letter received on July 24th, 2024.

Several items contained in the responses are considered TRADE SECRET as they contain proprietary information related to JHP and Wakely Consulting Group (Wakely). TRADE SECRET information includes the following but is not limited to: assumptions developed based on Wakely proprietary data and assumptions and methodologies that could provide insight into JHP's pricing strategy. Only allowable redactions per Pennsylvania Insurance Department's 2025 rate filing guidance have been removed from the public version of this document. A corresponding redaction justification has been submitted along with this response.

[REDACTED]

Date: July 31, 2024



July 31, 2024

Michael Gurgiolo Pennsylvania Insurance Department

RE: OBJECTION LETTER FOR JEFFERSON HEALTH PLANS, 2025 INDIVIDUAL PLAN RATES, PICI-134098077

Below are our responses on behalf of the Jefferson Health Plan's (JHP's) objection letter dated July 24th, 2024. These objections pertain to JHP's 2025 individual rate filing. Any references to Excel exhibits can be found within the file "19702_JHP Objection Exhibits_2024.07.31.xlsx" accompanying this response.

Several items contained in the responses are considered TRADE SECRET as they contain proprietary information related to JHP and Wakely Consulting Group (Wakely). A public version of this document has been uploaded with this response, along with a redaction justification document and cover letter, based on information determined to be confidential, according to Pennsylvania Insurance Department (PID) guidance.

Objection 1:

The program parameters for Plan Year 2025 will be adjusted from the parameters announced in Notice 2024-07 published at 54 Pa.B. 2907 (May 25, 2024). Beginning January 1, 2025, the program-adopted parameters will be adjusted to an attachment point of \$60,000, a cap of \$100,000 and a coinsurance rate of 60%. Please update the rate filing accordingly.

Objection 1: Wakely's Response

The revised filing submitted 7/31 is inclusive of this change.

Objection 2:

In Table 16 of PAAME, the Administrative Cost Adjustment should be 0.86 and the State Average Monthly Premium Before Adjustment could be calculated as the State Average Monthly Premium / 0.86. Please revise.

Objection 2: Wakely's Response

This has been revised in the updated filing material.

Objection 3:

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 are identical.



Objection 3: Wakely's Response

We confirm we've tested for identical rates among the three filing forms. The discrepancy in rates from Table 11 PAAME is a result of rounding within an earlier step. Please see the "Obj 3" tab for an example of these rates.

Objection 4:

Please ensure that the 7/31/24 versions of the following items are posted in SERFF with your July 31st response to this data call.

- a) Cover Letter identifying all changes made and the reasons for the change. Also, show the revised rate change.
- b) PA Actuarial Memorandum
- c) PA Actuarial Memorandum Exhibits
- d) Department's Plan Design Summary and Rate Template Exhibits (please ensure that the rate template by county is populated with only numeric values no "NA")
- e) URRT
- f) Federal Rate Template
- g) Part III: Actuarial Memorandum
- h) Rate Change Summary information included on the VI Rate Change Summary tab of the PA Actuarial Memorandum Exhibits
- 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).

Objection 4: Wakely's Response

We confirm that all the named files are posted in SERFF with the response to this data call.

Please let us know if you would like to discuss.

Sincerely,

[REDACTED]

Development Age 21 Rates Across Filing Forms are Identical

Example for Plan 19702PA0010006, Age 21, Non-Tobacco User

	19702PA0010006	
Data Source	Jefferson Total Silver	
Table 11 PAAM	\$516.29	=III Plan Rates'!\$AA\$18
PA Plan Design Summary and Rate Table	\$516.27	=Rate Table'!\$E\$21
Federal Rate Table/Binder	\$516.27	=Rate Pages'!\$C\$26

Partners Insurance Company, dba Jefferson Health Plans

Redaction Justification – July 31st, 2024 filing

Cover Letter

Redacted names and contact information (page 2)

URRT Part III – Federal Actuarial Memorandum / PA Actuarial Memorandum

- Redacted Name of opining actuary (page 7, 24, 26)
- Redated COVID-19 impact (page 13, 31, 33) confidential and proprietary information
- Redacted Company Contact Information (page 7) name, telephone number, email address
- Redacted Projected Risk Adjustment Transfers confidential and proprietary information specifying a company's anticipated risk level in relation to the state average risk level (page 14, 31, 32, 33)
- Specific provider contracting information (page 12, 31, 33) confidential and proprietary information
- Commission schedules (page 16) confidential and proprietary information

PA Actuarial Memo Rate Exhibits

- Redacted column C through E in Tabs "II.a. Reins Table Exp" and "II.a. Reins Table Prof" confidential and proprietary information
- Redacted Network Factor in tab "II Rate Development & Change" confidential and proprietary information
- Redacted Other Factor in tab "II Rate Development & Change" confidential and proprietary information
- Redacted Projected Risk Adjustment Transfers and formula components on tabs "II Rate
 Development & Change" and "VII Risk Adjustment" confidential and proprietary
 information specifying a company's anticipated risk level in relation to the state average risk
 level

Standard Questions

- Redated question 3b of standard questions, COVID-19 impact (page 42) confidential and proprietary information
- Redacted question 5 of standard questions, commission schedules (page 43) confidential and proprietary information

Unique Plan Design Supporting Documentation and Justification

Federal AV screenshots (page 76)

Objection Responses due 6/19/2024

Objection Cover Letter

Redacted names and contact information (page 77)

Objection Response Letter

- Specific provider contracting information (objection 7 and 8, page 81) confidential and proprietary information
- Confidential and proprietary information specifying a company's anticipated risk level in relation to the state average risk level (objection 12, page 82)
- COVID-19 Impact (objection 19, page 84)
- Redacted Company Contact Information (page 85) name, telephone number, email address

Objection Exhibits File

- Specific provider contracting information confidential and proprietary information
 - o Tab "Obj 2b" cells D66:F66
 - o Tab "Obj 2d" cell E12
 - o Tab "Obj 2f" cells C13:C14
 - o Tab "Obj 8"
- Redacted Projected Risk Adjustment Transfers confidential and proprietary information specifying a company's anticipated risk level in relation to the state average risk level
 - o Tab "Obj 2d" cells E17:E19, E22
 - o Tab "Obj 12"
 - o Tab "Obj 13" cell C8
- COVID-19 Impact
 - o Tab "Obj 2b" cell D74
 - o Tab "Obj 2d" cell E8

Objection Responses due 7/17/2024

Objection Cover Letter

Redacted names and contact information (page 97)

Objection Response Letter

- Specific provider contracting information (objection 3, 8, page 99, 100) confidential and proprietary information
- Confidential and proprietary information specifying a company's anticipated risk level in relation to the state average risk level (objection 2, page 99)
- COVID-19 Impact (objection 6, page 100)
- Redacted Company Contact Information (page 101) name, telephone number, email address

Objection Exhibits File

- Specific provider contracting information confidential and proprietary information
 - o Tab "Obj 7" cells D7:E7
- Redacted Projected Risk Adjustment Transfers confidential and proprietary information specifying a company's anticipated risk level in relation to the state average risk level
 - o Tab "Obj 4" cells C8, C11

Objection Responses due 7/31/2024

Objection Cover Letter

• Redacted names and contact information (page 105)

Objection Response Letter

 Redacted Company Contact Information (page 107) – name, telephone number, email address

Completeness and Redaction Justification Checklist

Issuer Name: Partners Insurance Company, dba Jefferson Health Plans

Market: Individual SERFF ID: PICI-134098077

TOC#	Description	Completed (Mark with "X")	Redaction Justification			
			Redacted (Y/N)	Page # in Public PDF	Justification submitted (Y/NA)	
Federal Do	ocuments Required to Be Filed with PID					
A.2.	RFJ Part I - Unified Rate Review Template	Х				
	RFJ Part II – Consumer Friendly Justification					
	RFJ Part III – Actuarial Memorandum	Х	Υ	3	Υ	
	Federal Rates Template	Х				
Summary I	Documents/Confirmation of HIOS & SERFF Submissions					
A.2.B.	HIOS Submission	Х				
A.2.C.	SERFF Submission	Х				
A.2.D.	SERFF Rate/Rule Schedule Tab	Х				
В.	Cover Letter & PA Bulletin Information	Х				
PA Actuarial Memorandum and Rate Exhibits						
D.1.A.	Company Information	Х	Υ	6	Υ	
D.1.B.	Rate History & Proposed Variation in Rate Changes	Х	N	8	NA	
D.1.C.	Average Rate Change	Х	N	8	NA	
D.1.D.	Membership Count	Х	N	8	NA	
D.1.D.	PA Act. Exhibits Table 1	Х	N	46	NA	
D.1.E.	Benefit Changes	Х	N	9	NA	
D.1.F.	Experience Period Claims & Premium	Х	N	9	NA	
D.1	PA Act. Exhibits Table 2	Х	N	46	NA	
D.1.G.	Credibility of Data	Х	N	9	NA	
D.1.G.	PA Act. Exhibits Tables 2b, 3b, 4b (if applicable)	Х	N	47	NA	
D.1.H.	Trend Identification	Х	N	10	NA	
D.1.11.	PA Act. Exhibits Table 3	Х	N	46	NA	
D.1.I.	Historical Experience	Х	N	10	NA	
D.1	PA Act. Exhibits Table 4	Х	N	46	NA	
D.2.A.	Development of PAIR, MAIR and Total Allowed Claims	Х	Y	10	Υ	
	PA Act. Exhibits Table 5	Х	Υ	50	Y	
D.2.B.	Retention Items	Х	Υ	15	Υ	
D.Z.B.	PA Act. Exhibits Table 6	Х	N	50	NA	
D.2.C.	Normalized Market-Adjusted Projected Allowed Total Claims	Х	N	17	NA	
	PA Act. Exhibits Table 7	Х	N	50	NA	
	Components of Rate Change	Х	N	18	NA	
D.2.D.	PA Act. Exhibits Table 8	Х	N	50	NA	
	PA Act. Exhibits Table 9	Х	N	50	NA	
D.3.	Plan Rate Development	Х	N	19	NA	
	PA Act. Exhibits Table 10	Х	N	51	NA	
D.4.	Plan Premium Development for 21-Year-Old Non-Tobacco User	Х	N	21	NA	
JT.	PA Act. Exhibits Table 11	Х	N	52	NA	
D.5.A.	Age and Tobacco Factors	Х	N	22	NA	
D.J.A.	PA Act. Exhibits Table 12	Х	N	54	NA	
D.5.B.	Geographic Factors	Х	N	22	NA	
D.3.B.	PA Act. Exhibits Table 13	Х	N	54	NA	
D.5.C.	Network Factors	Х	N	22	NA	
	PA Act. Exhibits Table 14	Х	N	54	NA	
D.5.D	Rate Change Request Summary	Х	N	22	NA	
	PA Act. Exhibits Table 15	Х	N	57	NA	
D.5.E.	Service Area Composition	Х	N	23	NA	
D.5.F	Composite Rating	Х	N	23	NA	
D.6.	Actuarial Certifications	Х	Y	24	Υ	
Additional Exhibits						
E.	Department Plan Design Summary & Rate Tables	Х	N	59	NA	
	Service Area Map	Х	N	64	NA	
Redaction	Justification (must be submitted if any information is redacted)	Х			Υ	