

Independence Assurance Company – Small Group Plans

Rate Request filing ID # INAC-134056112 – 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: 7.17% Revised requested average rate change: 7.15%

Range of requested rate change: 5.55% to 7.73% Effective date: January 1, 2025

Mapped members: 77,382
Available in: Rating Area 8

Key Information

Jan. 2023-Dec. 2023 financial experience

Premiums Claims Administrative Expenses Taxes & Fees	\$0 \$0 \$0 \$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:	85%
Administrative:	11%
Taxes & Fees:	3%
Profit:	2%

The insurer expects its annual medical costs to increase 6.9%.

Our Decision

The insurer requested an average 7.17% rate change in the small group market for enrollees in current 2024 plans who will continue coverage with the insurer in 2025. The insurer later revised its rate filing to request a rate change of 7.15% due to revisions made during the Department's standard review. The statewide average rate increase request across all insurers is 7.6%.

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 were reasonable in relation to the benefits, and if the insurer would be able to pay projected claims and expenses. The Department also considered factors such as the insurer's revenues, medical and administrative

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





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costs, actual and projected profits, and past rate changes, as well as the effect the 2025 rate change would have on Pennsylvania consumers.

The Department notes that the 2025 rates have increased by an average of 7.6% compared to the 4.1% average increase approved in 2024. Insurers have cited the following as key drivers of these rate changes:

- 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.

The resulting average final rate change approved for this insurer is 7.15% ranging from 5.55% to 7.73%.

General Note: An insurer may not increase your rates more than once in a calendar year. Due to insurer movement between counties, employers are encouraged to shop around and compare plans. 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.





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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.)





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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



Independence 🚭

May 15, 2024

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

SUBMITTED VIA SERFF

RE: Independence Assurance Company 2025 Small Group PPO Rate Filing INAC-134056112

Dear Ms. Swartz:

Independence Assurance Company (IAC) is submitting this rate filing for Small Group Health Insurance rates effective January 1, 2025 and later.

Attached is the 2025 annual rate filing for PPO plans of Independence Assurance Company, Inc. (IAC) in the Small Group marketplace in the Commonwealth of Pennsylvania. Rates for all plans are being filed and satisfy market reform requirements of the Affordable Care Act (ACA). The rates are based on the combined experience of Small Group plans offered by Keystone Health Plan East and QCC Insurance Company, Inc.

This rate filing includes rates for these plans and specifies compliance with rating requirements of the ACA. The enclosed is for rating periods effective from January 1, 2025 through December 31, 2025.

The proposed rates represent a 6.88% increase over the previously approved 2024 rates. Information for the Pennsylvania Bulletin:

1.	Company Name and NAIC Number:	Independence Assurance Company
		16053
2.	Market	Small Group
3.	On or Off Exchange	Off
4.	Effective Date of Coverage	January 1, 2025
5.	Average Rate Change Requested	6.88%
6.	Range of Rate Changes Requested	5.5 % to 7.7%
7.	Total Annual Revenue Generated from	
	the Proposed Rate Change	\$40,903,643

Independence 👨

8. PPO **Products** 9. Rating Areas and Change from 2025 Rating Area 8; N/A 10. Metal Levels and Catastrophic Plans Platinum, Gold, Silver, Bronze 11. Current covered lives and policyholders 0 lives as of February 1, 2024 Number of plans offered in 2025 and 12. 20 plans in 2025; 20 plans in 2024 change from 2024 Corresponding contract form number, 13. SERFF # INLG-134079881, SERFF, and binder numbers INLG-134080019, INLG-PA25-125118197 See appendix for form numbers. HIOS Issuer ID # 44415; Tracking # 14. HIOS Issuer ID # and submission tracking Number N/A with any questions Please contact at or regarding this filing. Sincerely, cc:

Independence 🚭

APPENDIX

Form Numbers

17027.WR-III Rev. 1.25 17027-BC.SG.OFF Rev. 1.25 17027-BC.SG.OFF.HSAHRA Rev. 1.25 17028.WR Rev. 1.25 17028-BC.SG.OFF.HSA Rev. 1.25 PREV/SCH-II Rev. 1.25

PENNSYLVANIA ACTUARIAL MEMORANDUM

PURPOSES

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

1. BASIC INFORMATION AND DATA

A. COMPANY INFORMATION

Company Legal Name: Independence Assurance Company ("IAC")

State: Pennsylvania

NAIC #: 16053

Market:Small GroupMarketplace:Off Exchange

Effective Date(s): 1/1/2025 - 3/31/2025, 4/1/2025 - 6/30/2025, 7/1/2025 - 9/30/2025,

10/1/2025 - 12/31/2025

Average Rate Change: 6.88%

Range of Rate Changes: 5.5% to 7.7%

Products: PPO

Rating Areas: Rating Area 8

Metal Levels: Platinum, Gold, Silver, Bronze

Current Members: 0
Number of 2025 Plans: 20
HIOS Issuer ID (5-digit): 44415

Worksheet 1 of the accompanying URRT contains experience period data and development of the projected Single Risk Pool Gross Premium Average Rate PMPM for the small group market for QCC. Worksheet 2 contains experience period data and projections by product for the single risk pool for the same entities. This memorandum pertains only to plans denoted in Worksheet 2 by Plan IDs starting with the sequence 44415.

1

COMPANY CONTACT INFORMATION

Primary Contact Name:

Primary Contact Telephone Number:

Primary Contact Email Address:



B. RATE HISTORY AND PROPOSED VARIATIONS IN RATE CHANGES

N/A

C. AVERAGE RATE CHANGE

The average proposed rate change shown in Cell AC15 of Table 10 is 6.88%. The changes to the single risk pool gross premium average rate per member per month (PMPM) from calendar year 2023 to calendar year 2025 are incorporated into the pricing and reflected in the Unified Rate Review Template.

The change in 21-year-old Non-Tobacco Premium PMPM calculated in Table 11, Cell AN13 is 6.88%.

D. MEMBERSHIP COUNT

There are no members currently enrolled in IAC plans. We anticipate that members will be begin enrolling beginning July 1, 2024.

E. BENEFIT CHANGES

Benefit changes were made to the following plans to assure compliance with Actuarial Value Requirements, including differences that resulted from changes to the AV Calculator. The basis for pricing changes was our internal pricing model.

F. EXPERIENCE PERIOD CLAIMS AND PREMIUMS

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

The experience period data used for IAC is the combined experience of QCC Insurance Company, Inc., and the experience period data for Keystone Health Plan East ("KHPE"). This should provide a more stable basis for projecting the Index Rate. The combined data is shown in Tab Ib. The Change in Network Factor is intended to result in IAC rates that are reasonable in relation to KHPE and QCC rates.

Experience period premium, claims, and member months are obtained from the company's internal data warehouse. The claims data is collected for incurred dates from January through December 2023 and paid through February 2024. Earned premiums and member months are for January through December 2023. The data are for all direct-written Small group business of QCC in the Commonwealth of Pennsylvania, including out-of-network claims written by QCC but paid by QCC for POS plans. No private reinsurance was applicable.

Projected Risk Adjustment PMPM

The Non-EHB benefits portion of Allowed Claims is shown separately in cell H36 of Table 2. Capitation is uniform by age for the experience period. Net pharmacy rebates are illustrated in cell I36 of Table 2.

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

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

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

The projected risk adjustment amounts for KHPE and Independence Blue Cross (QCC) are consistent with the projection made in the respective submissions. We also considered preliminary 2023 risk transfer results.

In the URRT v6.0, it is necessary to divide Risk Adjustment by the Paid to Allowed factor when it is used in calculations based on Allowed Claims to produce calculations that are consistent with the Actuarial Memo Rate Exhibit.

G. CREDIBILITY OF DATA

The experience period data, defined in Section F as the combined experience of QCC Insurance Company, Inc., and the experience period data for Keystone Health Plan East ("KHPE"). is considered 100% credible.

H. TREND IDENTIFICATION

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

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

I. HISTORICAL EXPERIENCE

IAC is a new legal entity and has no prior experience. Costs are projected from the historical experience of KHPE and QCC Small Group plans.

a. Annualized Cost Trend

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

b. Annualized Utilization Trend

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

c. Rebates

There are no rebate payments projected since IAC was not offering coverage in prior years.

J. TERMINATED PLANS

No plans are being terminated during 2025.

2. RATE DEVELOPMENT AND CHANGE

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

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

Changes in Population Risk Morbidity

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

Changes in Other Factors

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

We incorporated the quarterly trend methodology from Table 5A into the URRT Part 1 Worksheet 1 Section II so that the calculated MAIR in the URRT was consistent with the MAIR calculated in the Actuarial Memo Rate Exhibits. The factor is also applied in the URRT Worksheet 2 Section 3, Plan Adjustment Factors, to correctly calculate the first quarter 2025 rates.

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

B. RETENTION ITEMS

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

Administrative Expenses		14.12%
General and Claims	8.45%	
Agent/Broker Fees and Commissions	4.87%	
Quality Improvement Initiatives	0.80%	
Taxes and Fees		0.62%
Risk Adjustment User Fee	0.03%	
PCORI Fee	0.06%	
PA Premium Tax	0.00%	
Federal Income Tax	0.53%	
Health Insurance Providers Fee	0.00%	
Profit/Contingency		2.00%

Total Retention 16.73%

C. NORMALIZED MARKET-ADJUSTED PROJECTED ALLOWED TOTAL CLAIMS

Table 7 compares the normalization factors used in this filing to those used in the 2024 filing. The changes in the factors reflect small differences from the projected populations in 2024 and 2025.

D. COMPONENTS OF RATE CHANGE

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

Data in Table 9 is consistent with the 2024 and 2025 URRT with the exception of Risk Adjustment which was revised to project company-specific values.

E. MLR DEMONSTRATION

Projected Claims PMPM (After Reinsurance)	\$569.87
Premium PMPM	\$684.37
Quality Improvement Expense PMPM	\$5.47
Exchange User Fee PMPM	\$0.00
HIF PMPM	\$0.00
Federal Income Tax PMPM	\$3.64
Premium Tax PMPM	\$0.00
Federal MLR	84.5%

3. PLAN RATE DEVELOPMENT

Table 10 is populated with plan information consistent with entries in the 2025 URRT. Plan mappings, where applicable, are illustrated in Column F of Table 10.

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

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

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

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

5. PLAN FACTORS

Tables 12, 13, and 14 illustrate the factors used in pricing for age, tobacco, geographic rating area, and network. The tobacco factors match the previously approved tobacco factors from the 2024 filing.

6. ACTUARIAL CERTIFICATION

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

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

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

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

 The information presented in the PA Actuarial Memorandum and PA Actuarial Memorandum Rate Exhibits is consistent with the information presented in the 2025 Rate Filing Justification.

May 15, 2024

PA Rate Template Part I Data Relevant to the Rate Filing

Table 0. Identifying Information

Carrier Name:	Independence Assurance Company
Product(s):	PPO
Market Seament:	Small Group
Rate Effective Date:	1/1/2025
Base Period Start Date:	1/1/2023
Date of Most Recent Membership:	2/1/2024

to 12/31/2025 to 12/31/2023

Table 1. Number of Members

	Member-months	Members	Member-months
	Experience Period	Current Period (as of 02-01-2024)	Projected Rating Period
Average Age	0.0	0.0	0.0
Total	0	0	0
<18	0	0	0
18-24	0	0	0
25-29	0	0	0
30-34	0	0	0
35-39	0	0	0
40-44	0	0	0
45-49	0	0	0
50-54	0	0	0
55-59	0	0	0
60-63	0	0	0
644	0		

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 Reco
S -	s -	\$ -		s -	s -	s -	\$ -	s -	S -	s -	S
Experience Period Total Allowed EHB Claims + EHB Capitation PMPM (net of prescription drug rebates)								s			
Incs Ratio											

Table 3. Trend Components

Service Category	Cost*	Utilization*	Induced Demand*	Composite Trend	Weight*
Inpatient Hospital	5.60%	4.29%		10.12%	15.37%
Outpatient Hospital	4.79%	4.29%		9.29%	21.84%
Professional	2.90%	4.29%		7.31%	26.93%
Other Medical	2.90%	4.29%		7.31%	0.00%
Capitation				3.51%	11.04%
Prescription Drugs	-0.54%	4.29%		3.72%	24.82%
Total Annual Trend				6.89%	100.00%
Months of Trend				24	
Total Applied Trend Projection Factor				1.143	

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

**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		\$ -	0.0000			#DIV/01		\$ -		#DIV/01
Feb-20		\$ -	0.0000	#DIV/01		#DIV/01		\$ -		#DIV/01
Mar-20		s .	0.0000	#D(V/01		#DIV/01		s .	s .	#DIV/01
Apr-20		\$ -	0.0000	#D(V/01		#DIV/01		\$ -	S -	#DIV/01
May-20		s .	0.0000	#D(V/01		#DIV/01		s .	s .	#DIV/01
Jun-20		\$ -	0.0000	#D(V/01		#DIV/01		\$ -	S -	#DIV/01
Jul-20		5 -	0.0000	#D(V/01		#DIV/01		\$ -	S -	#DIV/01
Aug-20		s .	0.0000	#D(V/01		#DIV/01		s -	s -	#DIV/01
Sep-20		s -	0.0000	#D(V/01		#DIV/01		\$ -	S -	#DIV/01
Oct-20		s .	0.0000	#D(V/01		#DIV/01		s -	s -	#DIV/01
Nov-20		s .	0.0000	#D(V/01		#DIV/01		s -	s -	#DIV/01
Dec-20	< .	s .	0.0000	#D(V/01		#DIV/01	٠	s .	\$.	#DIV/01
Jan-21	_	٠.	0.0000	#DIV/01		#DIV/01		٠.	\$	#DIV/01
Feb-21			0.0000	#DIV/DI		#DIV/01			\$	#DIV/01
Mar-21		-	0.0000	#D(V/D)		#DIV/01		-	\$	#DIV/01
Apr-21		-	0.0000	#D(V/01		#DIV/01		÷ :		#DIV/01
May-21			0.0000	#D(V/01		#DIV/01				#DIV/01
		-	0.0000						6	
Jun-21 Jul-21			0.0000	#D(V/01 #D(V/01		#DIV/01 #DIV/01		<u> </u>	3	#DIV/01 #DIV/01
		· ·						<u> </u>	S -	
Aug-21		<u> </u>	0.0000	#DIV/DI		#DIV/01		<u> </u>	5 -	#DIV/01
Sep-21		· .	0.0000	#DIV/01		#DIV/01		<u> </u>	5 -	#DIV/01
Oct-21		\$ -	0.0000	#D(V/01		#DIV/01		\$ -		#DIV/01
Nov-21		s .	0.0000	#D(V/01		#DIV/01			s .	#DIV/01
Dec-21	s .	\$ -	0.0000	#D(V/01		#DIV/01	S -	\$ -		#DIV/01
Jan-22		\$ -	0.0000	#D(V/01		#DIV/01		\$ -		#DIV/01
Feb-22		s .	0.0000	#DIV/01		#DIV/01			S -	#DIV/01
Mar-22		\$ -	0.0000	#DIV/01	-	#DIV/01		\$ -	5 -	#DIV/01
Apr-22		S -	0.0000	#DIV/01		#DIV/01		s .	S -	#DIV/01
May-22		s .	0.0000	#DIV/01		#DIV/01		s .	s -	#D(V/01
Jun-22		\$ -	0.0000	#DIV/01		#DIV/01		\$ -	S -	#DIV/01
Jul-22		s .	0.0000	#D(V/01		#DIV/01		s .	S -	#DIV/01
Aug-22		\$ -	0.0000	#DIV/01		#DIV/01		\$ -	s -	#DIV/01
Sep-22		s .	0.0000	#D(V/01		#DIV/01		s .	S -	#DIV/01
Oct-22		s .	0.0000	#D(V/01		#DIV/01		s .	s .	#DIV/01
Nov-22		5 -	0.0000	#D(V/01		#DIV/01		s -	S -	#DIV/01
Dec-22	s .	s .	0.0000	#D(V/01		#DIV/01	s .	s -	s -	#DIV/01
Jan-23		s .	0.0000	#D(V/01		#DIV/01		s -	s -	#DIV/01
Feb-23		s -	0.0000	#D(V/01		#DIV/01		s -	s -	#D(V/01
Mar-23		š .	0.0000	#D(V/01		#DIV/01		٠ .	9	#D(V/01
Apr-23		S .	0.0000	#D(V/01		#DIV/01		S .	S .	#D(V/01
May-23		\$.	0.0000	#D(V/01		#DIV/01		٠ .	9	#DIV/01
Jun-23			0.0000	#D(V/D)		#DIV/01			ć	#DIV/01
Jul-23			0.0000	#D(V/01		#DIV/01		-	3	#DIV/01
Aug-23			0.0000	#D(V/01		#DIV/01		-		#DIV/01
Aug-23 Sep-23			0.0000	#D(V/01		#DIV/01			3	#DIV/01
Oct-23 Nov-23			0.0000	#DIV/01 #DIV/01		#DIV/01 #DIV/01			3 .	#DIV/01

* Express Completion Factor as a percentage

*Express Prescription Drug Rebates as a negative number

Carrier Name: Independence Assurance Company
Product[s]: PPO
Market Segment: Small Group
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
\$ 1,248,542,970.15	\$ 923,649,709.37	\$ 935,080,138.84	1,995,729	\$ 189,864,923.64	\$ 1,124,945,062.47	s -	S	(104,296,752.91)	\$ 124,976,825.51	\$ 6,125,697.68	\$ (13,787,045.57)	\$ -
Experience Period Total Allowed EH	Experience Period Total Allowed EHB Claims • EHB Capitation PMPM (net of prescription drug rebates)									\$ 574.04		
Loss Ratio											77.90%	

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	5.60%	4.29%		10.12%	15.37%
Outpatient Hospital	4.79%	4.29%		9.29%	21.84%
Professional	2.90%	4.29%		7.31%	26.93%
Other Medical	2,90%	4.29%		7.31%	0.00%
Capitation				3.51%	11.04%
Prescription Drugs	-0.54%	4.29%		3.72%	24.82%
Total Annual Trend				6.89%	100.00%
Months of Trend				24	
Total Applied Trend Projection Factor				1.143	

Total Applied Trend Projection Factor

Formers Cost Utilization Indused Utilization and Mainbt as personations

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 Druz Rebates)	Allowed PMPM
Jan-20		5 73.912.533.65	1.0000		186.378			\$ (5.392.814.50)	\$ 85,621,610,15	
Feb-20		\$ 71,179,245.66	1.0000	\$ 71,179,245.66	185,887	\$ 382.92		\$ (5,378,003.79)	\$ 80,977,774.98	\$ 435.
Mar-20		5 63,881,909,02	1.0000	\$ 63.881.909.02	185.679	\$ 344.04		\$ (5.372.133.63)	S 71.964.544.23	
Apr-20		\$ 49,269,183.25	1.0000	\$ 49,269,183.25	183,805			\$ (5,513,564.13)	\$ 53,117,797.33	\$ 288
May-20		\$ 57.005.920.10	1.0000	\$ 57.005.920.10	182.608	\$ 312.18		\$ (5.476.707.03)	\$ 62.292.154.76	
Jun-20		S 68.103.161.46	1.0000	S 68.103.161.46	181.011	S 376.24		\$ (5,471,887,56)	S 75.587.249.36	S 417
Jul-20		\$ 69,407,880.82	1.0000	\$ 69,407,880.82	180,866			\$ (5,700,639.04)	\$ 77,100,597.95	
Aug-20		S 69.071.381.52	1.0000	\$ 69.071.381.52	180.102	\$ 383.51		\$ (5,676,489,54)	\$ 76,758,322,93	S 426
Sep-20		5 69,441,806.21	1.0000	\$ 69,441,806.21	178,670			\$ (5,633,165.44)	\$ 77,115,859.84	\$ 431
Oct-20		\$ 74,349,525,78	1.0000	\$ 74.349.525.78	178.624	\$ 416.23		\$ (5.803.661.39)	\$ 82,755,510,09	S 463
Nov-20		5 70.324.264.24	1.0000	\$ 70.324.264.24	177.466			\$ (5,765,435,76)	S 77.834.038.74	S 438
Dec-20	S 1,202,060,239,95		1.0000		176.577		\$ 159,629,190,99	\$ (5.736.748.34)	\$ 80.685.242.37	
Jan-21		\$ 72,921,871.60	1.0000	\$ 72.921.871.60	176.488	S 413.18		\$ (6.311.922.78)	\$ 82.068.097.54	S 465
Feb-21	-	S 64,314,599,86	1,0000		176.307			S (6.307.040.73)	S 71.801.621.87	
Mar-21		S 82.148.339.87	1,0000		176.294	S 465.97		S (6.310.189.02)	S 92.338.305.99	
Apr-21		5 77,279,089,16	1.0000		175,737			\$ (6,696,212,56)	S 86.111.420.34	
May-21		S 73.707.922.43	1.0000		175.277			S (6.683.191.51)	S 81.103.108.60	
Jun-21		5 75 886 415 85	1,0000		174,519			\$ (6,655,381,17)	5 84 184 318 82	
Jul-21		5 67.322.995.37	1,0000		173,412		1	S (6.583.174.18)	S 74.982.271.03	
Aug-21	H	5 73.704.288.11	1,0000		173.094			S (6.574.460.47)	S 81.544.789.05	
Sep-21	- F	5 72,510,425,52	1.0000		172,956			\$ (6.572.828.66)	S 79.387.702.83	
Oct-21	-	S 74.927.387.31	1,0000		172,396			\$ (6,678,911.56)	\$ 81,933,350.80	
Nov-21		5 74,927,387.31 S 74.072.443.17	1.0000		172,177		1	\$ (6.671.852.37)	\$ 80,206,469,56	
Dec-21	\$ 1,207,866,070,03	5 78.144.246.37	1.0000		172,177		\$ 172,099,599,01	\$ (6,680,339,66)	\$ 84.652.662.53	
	5 1,207,866,070.03		1.0000				5 1/2,099,599.01	\$ (7.505.829.52)	S 78.538.928.39	
Jan-22 Feb-22	-	5 71.519.778.54 5 67.928.636.98	1,0000		171.663 172.039			\$ (7.525.267.87)	5 74.338.928.39 5 74.338.282.71	
	-									
Mar-22		5 77.425.802.54 S 70.123.809.27	1.0000		171.829 171.732			\$ (7.517.665.79) \$ (7.510.717.22)	\$ 86.262.616.47 \$ 77.371.017.14	
Apr-22										
May-22		78.414.941.53	1.0000		171.463			\$ (7.501.098.82)	\$ 85.716.897.77	
Jun-22	- L	S 74,599,774,95	1.0000		171.833			\$ (7.520.029.14)	S 81.854.387.25	
Jul-22		\$ 69,105,077.00	1.0000		171,011			\$ (7,132,384.31)	\$ 75,176,852.33	
Aug-22		5 76.997.961.45	1.0000		170.247			\$ (7.101.017.82)	\$ 84.752.238.60	
Sep-22		5 78,893,252.99	1.0000		169,761			\$ (7,081,410.12)	\$ 85,576,286.34	
Oct-22		\$ 75.244.508.67	1.0000		168.918			\$ (7.015.254.17)	S 81.996.081.79	
Nov-22		S 73.388.870.87	1.0000		168.588			\$ (7.001.071.85)	S 80.115.441.41	
Dec-22	S 1,222,838,638,48		1.0000		168,721		\$ 172,617,563,58	\$ (6,974,537.04)	\$ 79,785,333.40	
Jan-23		\$ 74,023,022.81	0.9983		167,152			\$ (8,639,399.29)		
Feb-23		S 73.907.056.58	0.9978		166.907			\$ (8.631.067.18)	S 81.339.414.99	
Mar-23		\$ 83,022,566.95	0.9961		166,927			\$ (8,637,158.31)	\$ 92,096,241.03	
Apr-23		S 74.071.119.33	0.9957	\$ 74.391.194.81	166.185			\$ (8.745.261.43)	S 81.249.288.01	
May-23		\$ 81,857,215,92	0.9954		166.589			\$ (8,770,445,24)	S 90.380.214.91	
Jun-23		\$ 76,274,191.71	0.9928		166,422			\$ (8,761,370.84)	\$ 83,958,708.76	
Jul-23		5 72.011.664.23	0.9920	\$ 72.595.591.51	165.932	\$ 437.50		\$ (8,615,051,39)	5 78,748,738,28	
Aug-23		\$ 80,807,298.43	0.9894		165,974			\$ (8,620,642.72)	\$ 88,801,773.30	\$ 535
Sep-23		5 74.657.886.41	0.9856	\$ 75.748.125.20	165,755	S 456.99		\$ (8,610,826,09)	\$ 81,726,998.38	S 493
Oct-23		S 80.642.054.40	0.9819		165.480			S (8.737.207.94)	S 88.951.783.21	
Nov-23		S 80.514.599.86	0.9730		165.790			S (8.757.725.12)	S 89.163.210.91	
Dec-23	S 1.248.542.970.15		0.9559		166.616		S 189.864.923.64	\$ (8,770,597,35)	S 81.772.064.79	

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

PA Rate Template Part II
Rate Development and Change
Carrier Name:
Producit):
Market Segment:
Rate Effective Date:

Independence Assurance Company 990 Small Group 1/1/2025

Development of the Projected Index Rate		Experience Data	N	Manual Data	
Total Allowed EHB Claims + EHB Capitation PMPM (net of prescription drug rebates) PMPM	\$		\$	574.04	 Actual Experience PMPM sh
Two year trend projection Factor		1.141		1.143	
Unadjusted Projected Allowed EHE Claims PMPM	s		5	655.91	
Single Risk Pool Adjustment Factors					
Chance in Morbidity - Impact of Reinsurance Program		1.000		1.000	
Change in Morbidity - All Other		1.000		1.000	 See URRT Instructions
Total Non-Morbidity Changes		0.000		1.221	
Change in Demographics		0.997		0.998	< See URRT Instructions
Change in Network		0.000		1.223	
Change in Benefits		1.000		1.000	 See URRT Instructions
Change in Other		1.000		1.000	<- See URRT Instructions
Total Adjusted Projected Allowed DIS Claims PMPM	e		5	800 63	
Total Aquatid Projected Allowed EHW Claims PrePrint Credibility Serters	,	0%	,	100%	c. See Instructions
		CON.	_		
Blended Projected EHB Claims PMPM			\$	800.63	<- Projected Index Rate
Development of the Market-Adjusted Index Rate and Total Allowed Claims					
Adjusted Projected Allowed EHB Claims PMPM	5		<- Indi	ex Rate for Projec	tion Period on URRT
Projected Paid to Allowed Ratio		0.719			
Projected incurred EHB Claims PMPM Market-wide Adjustments	5	575.64			
Projected Incurred Risk Adjustment PMPM	5	17.74			
Projected Incurred Exchange User Fees PMPM		\$0.00			
Projected Incurred Reinsurance Recoveries PMPM		\$0.00			
Market-Adjusted Projected Incurred DIS Claims PMPM	\$	557.90			
Market-Adjusted Projected Allowed DHII Claims PMPM	s	775.96	< Ma	rket-Adjusted Inc	lex Rate
Projected Allowed Non-DNB Claims PMPM	5	6.20			
Catastrophic Eliability Adjustment		1.000			
Market-Adjusted Projected Incurred Total Claims PMPM		562.3623277			
Market-Adjusted Projected Allowed Total Claims PMPM	s	782.16			

rience Period on URRT For Informational Purposes only - No input required.

Ellended Base Period Unadjusted Claims before Normalization	\$ 574.04	<- Index Rate of Experience Period on UR
Blended Earned Premium	\$ 1,248,542,970.15	
Blended Loss Ratio	77.90%	

Effective Date		1/1/2025		4/1/2025		7/1/2025		10/1/2025	Tot	al Single Risk Pool
# of Member Months Renewing in Quarter		166,264		185,941		154,613		200,832		907,650
Adjusted Projected Allowed EHB Claims PMPM	5	800.63	5	800.63	5	800.63	s	800.63	\$	800.63
Months of Trend				3		6		9		
Annual Trend		6.89%		6.89%		6.89%		6.89%		
Single Risk Pool Projected Allowed Claims	5	800.63	5	814.08		827.77	s	841.68	\$	817.09
Quarterly Trend Factor		1.000		1.017		1.034		1.051		1.02

Percentages 14.12% 24.55 24.55 24.55 24.55 24.55 24.55 24.55 24.55 24.55 24.55 24.55 24.55 25.55 PMPM Amounts \$35.14 \$37.07 \$32.37 \$3.40 \$4.16 \$0.18 \$0.39 \$0.00 \$1.59 \$0.00 \$1.59

Normalization Factors	2	224	200	25
Average Age Factor		1.502		1.430
Average Geographic Factor		1.000		1.000
Average Tobacco Factor		1.007		1.000
Average Benefit Richness (induced demand)		1.000		1.000
Average Network Factor		1.000		1.00
Market-Adjusted Projected Allowed Total Claims PMPM	s	734.84	\$	782.10
Normalized Market-Adjusted Projected Allowed Total Claims PMPM	s	485.48	5	522.53

Rate Components		2024	2025		Difference	Percent Change
A. Calibrated Plan Adjusted Index Rate (PMPM)		HOIV/01	40	IV/OI	MO(V)OI	#D/V/D
Base period allowed claims before normalization	s	525.21		4.04	5 48.83	#DIV/0
C. Normalization factor component of change	2	(178.22)	\$ (19	0.55)	\$ (12.33)	#DIV/0
D. Change in Normalized Allowed Claims Adjustment Components						
D1. Base period allowed claims after normalization D2. 1897 Trend	5	345.99		3.49	\$ 36.50	#DIV/0
	5	44.51	5 5	4.70	\$ 10.19	#DIV/0
D3. URRT Morbidity D4. URRT Other	5		s		\$ -	#DIV/0
	5	102.42		5.58	\$ (5.75)	#DIV/0
DS. Normalized URRT Risk Adjustment on an allowed basis	5	(12.20)	\$ (1	5.48)	\$ (4.28)	#DIV/0
DG. Normalized Exchange User Fee on an allowed basis	5		s		\$ -	#DIV/0
D7. Normalized Reinsurance Recoveries on an allowed basis	5		s		\$ -	#DIV/0
DB. Subtotal - Sum(D1:07)	5	481.72	5 51	8.39	\$ 36.67	#DIV/0
E. Change in Allowable Plan Adjusted Level Components E1. Network						
	5	(0.91)		0.971		#DIV/0
E2. Pricing AV	5	(132.56)		4.79)	\$ (12.23)	#DIV/0
E3. Benefit Richness	5	(1.32)	5 (1.421	\$ (0.09)	#DIV/0
E4. Catastrophic Eligibility	5		s		\$ -	#DIV/0
ES. Benefits in Addition to EHB	5	3.33		1.56	\$ 0.23	#DIV/0
EG. Subtotal - Sum(E1:E5)	5	(131.47)	\$ (14	3.621	\$ (12.16)	#DIV/0
F. Change in Retention Components						
F1. Administrative Expenses E2. Types and East		MONV/OI		IV/01	#DIV/OI	#DIV/0
		MONV/OI		IV/01	#DIV/OI	#DIV/0
F3. Profit and/or Contingency		MONV/OI		IV/01	#DIV/OI	#DIV/0
F4. Subtotal - Sum(F1:F3)		MONV/01	AC.	IV/01	#DIV/DI	#DIV/0
G. Change in Miscellaneous Items	s	-	s	-	s -	#DIV/0
H. Sum of Components of Rate Change (should approximate the change shown in line A)		#DIV/01	10	IV/OI	MOIV/OI	#D7V/D

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

	2024	2025	
Paid-to-Allowed	0.723	0.719	
URRT Trend (Total Applied Trend Factor)	1.128		<- LIRIT W1,52
URRT Morbidity	1.000		<- LIRRT W1, 52
URRT "Other"	1.262	1.221	< LIRRT W1, 52
Risk Adjustment	\$ (13.35)		<- LIRET W1, S3
Exchange User Fee	5 -		< LRRT W1. 53
Reinsurance Recoveries	5 -		< LRET W1, 53
Capitation	5 -	S -	< LRET W1, 52
Network	0.998	0.998	
Pricing AV	0.724		<- For 2024 in cell 381, please include a factor equal to the product of the average Pricing AV and the Non-Funding of CSR Adjustment
Benefit Richness	0.995	0.996	
Catastrophic Eligibility	1.000	1.000	
Benefits in Addition to EHB	1.010	1.010	
Administrative Expenses	14.18%	14.12%	
Taxes and Fees	0.60%	0.62%	
Profit and/or Contingency	2.00%	2.00%	

PA Rate Template Part III Table 10. Plan Rates Collection

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AND STATE OF THE S	98	980 980 600 600	200	Man San San San San San San San San San S	900 901	(800 (800 (800 (800	
2000 2000 2000 2000 2000		4000 4000 4000 4000 4000		Mills Mills Mills		A10 A10 A10	
		1000 1000 1000 1000		5000 5000 5000 5000 5000 5000 5000 500	200	200 200 200 200	
COURT		COSC COSC COSC COSC COSC COSC COSC COSC	2100 2100 2100 2100 2100	00.00 00.00 00.00 00.00		(8.00) (8.00)	
MACE MACE STREET	200 A 100 A	5000 5000 5000 5000	200 200 200 200 200	Main. Main.	200 200 200 200	361 361	## ## ## ## ## ## ## ## ## ## ## ## ##
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		1000 1000 1000 1000 1000		11.11 11.11 11.11 11.11	200	# 101 # 102 # 103 # 103	
######################################				60 to 1		(800) (800) (800)	
SHATE COLUMN COL	99 60 60 60 60 60 60 60 60 60 60 60 60 60	1000-0 1000-0 1000-0 1000-0 1000-0	200 200 200 200 200	5040 6150 6150 6150	#40 #10 #10 #10	### #### #### #### #### #### #### #### #### #### ##### ##### ######	
#00 #00 #00 #00 #00	100 mm	3000 3000 3000 3000	500 500 500 500 500 500	Main Main Main	200 200 200 200	#400 #400 #400	
				27.00 27.00 27.00 47.00		800 800 800	
	9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	MAC 100	### ### ### ### ### ### ### ### ### ##		200 200 200 200		
500 500 600 600 600	380	### ### ### ### ### ### ### ### ### ##		Man. Man. error	2003 2003 2003	980 C 980 C 990 C 990 C	200 200 200 200 200 200 200 200 200 200
500 500 500 500 500	100 mg/s	900 900 900 900		Man.	900 900 900	201 201 201	200 200 200 200 200
#100 #100 #100 #100		5000 5000 5000	200	55.00 55.00 56.00 56.00	900 900 900	(800 (800 (800	200 200 200 200
	9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9		500 500 500 500	Mari,	2003 2010 2010 2010 2010	800 900 900 800	M61.
900 900 900 900	300 300 300 300 300 300	M000 M000 0000 0000	200 200 200 200 200	Manus Manus eras	200 200 200 200	2005 2005 2005 2006 2006	
100 100 100 100 100 100 100 100 100 100		500 500	200 200 200 200	Mann Mann Mann	200 200 200	2000 2000 2000 2000	# 100 min
		500 500 500 500 500	500 500 900	51.00 51.00 50.00 50.00	# 10 mm		213 213 213 213 244
100 100 100 100 100	100 CH	1000 1000 1000 1000	2000 2000 2000 2000 2000	61 10 61 10 61 10 81 10	900 B	Street St	
Mach Sections	9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	3003 3003 3003 5003	201 201 201 200 200	Man.	2007 2007 2007	961 961 961 961	361 361 361
Company Comp		600 800 800 800 800		Man.	2000 2000 2000 2000	200 C	200 200 200 200
400 400 400 400		5000 1 5000 1 5000 1 5000 1		2000 2000 4000 Man	200 200 200 200	(MAC)	
	30 day	0000 0000 0000 0000	200 200 200 200 200	4000 4000 4000 4000	1000 1000 1000 1000		
865 616 617		5000. 5000. 5000. 5000. 5000.	886 910 910 910	9000 9000 9100 9100	900 900 900 900	900 900 910 910	### #### #############################
600 600 600 600 600 600 600	100 Maria	5000 5000 5000 5000	500 500 500	Main Main Main	200 200 200 200	865 865	200 200 200 200 200
611 612 613 614		2000 2000 2000 2000	200 200 200	45.00 45.00 45.00 45.00	0.00 0.00 0.00 0.00	(000 mm) (000 mm) (000 mm)	
800 800 800	94 94 94 94 94 94 94 94 94 94 94 94 94 9	5000 5000 5000 5000 5000	500 500 500 500	Mari,	2003 2010 2010 2010	800 900 900 900	M81,
600 600 600 600 600	300 March 1997 March 1		200 200 200 200	Man.	260 260 200	# 100 m	900 900 900 900 900
And		500 500 500 500 500	200 200 200	Marin Marin	200 200 200	200 200 300	2000 2000 2000 2000 2000
		5000 5000 5000 5000 5000	500 500 600 600	5100 5100 5100 5100 5100 5100 5100	900 900 900 900	(A)	
### Company	9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9		200 200 200 200 200		200 200 200	### A PART	985, 985, 915, 915, 915,
MIC		565 565 665	100 200 200	MARIN. MARIN. 6 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	200 200 200 200	200 200 200 200 200	2600 2600 2600 2600
ACC	100	5000 5000 5000 5000	2001 2001 2001	Man Man	200 200 200 200	5000 5000 5000 5000 5000	200 200 200 200 200
		0000				900	

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

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

Carrier Name: Independence Assurance Company

Product(s): PPO
Market Segment: Small Group
Rate Effective Date: 1/1/2025

Table 13. Geographic Factors

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

Table 14. Network Factors

	Projection Period Network Factors			
Network Name	Rating Area	Current	Proposed	Approval
PPO	Rating Area 8	1.000	1.000	
EPO	Rating Area 8	0.950	0.950	5/6/1997

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
Claima
Administrative Expenses
Taxes & Fees
Company Made After Taxes

The company expects its annual medical costs to increase:

Explanation of requested rate change: Premium rate

6.89%



Pating Area	Active Rating Areas	Count of Remaining Active Rating Areas	Text
1	Active Hatting Areas	Count of Nemaning Active Hating Areas	1
2			1
3			1
4			1
5			1
6			1
7			1
8	8	В	1 8
9			0

Table 16. Risk Adjustme	nt Calculation	
Component	Statewide	Insurer Specific
State Average Monthly Premium Before Adjustment	675.98	
Administrative Cost Adjustment	0.86	
State Average Monthly Premium	581.34	
Actuarial Value (AV)	0.78	0.77
Plan Liability Risk Score (PLRS)	1.26	1.26
Allowable Rating Factor (ARF)	1.50	1.49
Induced Demand Factor (IDF)	1.07	1.07
Geographic Cost Factor (GCF)	0.97	0.98
Factors Including Risk Score	1.31	1.33
Factors Excluding Risk Score	1.22	1.20
Risk Adjustment Transfer PMPM		17.74
Insurer Specific Manual Adjustment PMPM		
High Cost Risk Pool Adjustment PMPM		
Total Risk Adjustment Transfer		17.74

<-- Negative implies payer of RA

<-- Please provide explanation and calculation if value provided.

Market: Product:	Small G PPC																																							
Effective Date of Rates:	isneary i	2025			finding date of	Rates:	March	21, 2025																																
HIOS Plan ID (On Exchange):> HIOS Plan ID (Off Exchange):>	44415PA0	010001	444159000	20001	4441597	10020002	4441584	10020003	44415PA	0020004	4441SPA0	020006	44415PM	020006	4441SPA	1020007	44415PA	0020008	44415PA0	020009	4441SPAG	020010	44415PA0	0020011	4441SPA	0020012	44415PA	0020013	4441SPA	0020014	44415PAG	1020015	44415PA00	20016	4441594003	10017	44415PA	0020018	44415PA	0020019
	Choice EPO Silv			Preferred St	ice PPO Platin	on Preferred St	ice PPO Platin	am Preferred Sa	noice PPO Gold	Preferred \$400	noice PPO Gold I		ce PPO Gold CI		PPO Gold C		e PPO Silver S		se PPO Silver Cla		ice PPO Silver Cl												Choice PPO Silve							
Rating Area 12			1	AND LAS	AMMONETAL	8	ARRESTS. MA	8		No. of the last							-										-								1				-	
Network to Metal to	Personal Choic Silve		Personal Choic			pice Network	Personal Ch		Personal Cho	oice Network	Personal Choi		Fernanal Cho	or Network	Personal Cha	ce Network	Personal Cho		Personal Choi		Personal Choi		Personal Choi		Personal Cho		Personal Cho		Personal Cho		Personal Choi		Personal Choice	Network	Personal Choice		Personal Cho		Personal Cho	ice Network
Deductible 1>	53,00	10	50			10		i o	- 1		51		\$1,5		52,1		SAL		\$5,0		53,8		51,8	100	52,6		52,1		54,4		52,4		\$3,600		\$5,600		58,2			700
Colesurance to Copays to	20% after ded/2		510/S	20	S10	% /520	S20	7540	S40/		99 \$49.7		\$20 no ded/		Sed no ded		S40 no dedi		\$50 no ded/5		\$40 no ded/2		0% after	er ded	10 5257		0% afts	% er ded	9% after		30% aft		10% 10% after	ded	SON after	ded	9% att		0% afts	os ded
OOP Maximum 19	\$8,20	10	\$3,00	0	53,	500	54.	000	59,2	200	\$7,9		58,0	00	\$7,4	00	59,	100	59,2	00	59,2		58,2	100	58,1		58,1	900	58,1	00	58,2		\$8,300		\$8,200		58,3	100	58,1	200
Pediatric Dental (Yes, No) 10- Ase Band	Non-Tobacco	Tobacco	Non-Tobacco	Tobacco	Non-Tobacco	Tobacco	Non-Tobacco	Tobacco	Non-Tobacco	Tobacco	Non-Tobacco		Non-Tobacco	Yobacco	Non-Tobacco	Tobacco	Non-Tobacco	Tobacco	Non-Tobacco	Tobacco	Non-Tobacco		Non-Tobacco	Tobacco	Non-Tobacco		Non-Tobacco	Tobacco	Non-Tobacco	Yobacco	Ye Non-Tobacco		Non-Tobacco	Tobacco 1	Yes Non-Tobacco	Tobacco 1	Non-Tobacco	Tobacco	Non-Tobacco	Tobacco
0 - 14	\$268.89	\$268.89	\$509.41	\$509.41	\$499.90	\$499.90	\$475.99	\$475.99	\$376.76	\$376.76	\$294.59	\$394.59	\$365.26	\$365.26	\$361.68	\$361.68	\$262.81	\$262.81	\$253.98	\$253.98	\$291.56	\$291.56	\$425.57	\$425.57	\$244.76	\$344.76	\$402.89	\$402.89	\$315.29	\$315.29	\$280.51	\$280.51	\$312.95	\$312.95		\$215.72	\$229.58	\$239.58	\$359.21	\$359.21
15	\$292.79 \$301.93	\$292.79 \$301.93	\$554.69 \$572.01	\$554.69 \$572.01	\$544.33 \$561.32	\$544.33 \$561.32	\$518.30 \$534.48	\$518.30 \$534.48	\$410.25 \$423.06	\$410.25 \$423.06	\$429.66 \$443.02	\$429.66 \$443.07	\$297.72 \$410.14	\$297.72 \$410.14	\$292.82 \$406.13	\$293.83 \$406.13	\$286.17 \$295.10	\$286.17 \$295.10	\$276.56 \$285.19	\$276.56 \$285.19	\$317.48 \$327.10	\$317.48 \$327.39	\$463.40 \$477.86	\$463.40 \$477.86	\$375.41 \$397.13	\$375.41 \$387.13	\$438.70 \$452.39	\$438.70 \$452.39	\$343.31 \$354.03	\$343.31 \$354.03	\$305.44 \$314.98	\$305.44 \$314.98	\$340.77 \$351.41	\$340.77 \$351.41	\$234.90 \$242.23	\$234.90 \$242.23	\$260.88 \$360.00	\$260.88 \$269.02	\$391.14 \$403.35	\$295.54 \$400.35
17	\$311.07	\$311.07	\$589.32	\$589.32	\$\$78.31	\$579.31	\$550.66	\$550.66	\$435.86	\$435.86	\$456.48	\$456.48	\$422.55	\$422.55	\$418.42	\$418.42	\$304.03	\$904.03	\$293.82	\$293.82	\$337.30	\$337.30	\$492.33	\$492.33	\$398.84	\$298.84	\$466.09	\$466.09	\$364.74	\$364.74	\$324.51	\$324.51	\$362.04	\$362.04	\$249.56	\$249.56	\$277.16	\$277.16	\$415.56	\$415.56
18	\$320.91 \$330.75	\$320.91 \$330.75	\$607.97 \$636.61	\$607.97 \$626.61	\$596.61 \$614.91	\$596.61 \$614.91	\$568.08 \$568.08	\$568.08 \$585.50	\$469.65 \$463.44	\$449.65 \$463.44	\$470.99 \$485.37	\$470.92 \$485.37	\$435.92 \$449.29	\$435.92 \$449.29	\$431.66 \$444.90	\$431.66 \$444.90	\$313.65 \$323.27	\$213.65 \$323.27	\$303.12 \$312.41	\$303.12 \$313.41	\$247.97 \$358.64	\$347.97 \$358.64	\$507.90 \$523.49	\$507.90 \$523.48	\$411.46 \$424.08	\$411.46 \$424.08	\$490.83 \$495.58	\$480.83 \$495.58	\$376.28 \$397.92	\$376.28 \$387.82	\$334.78 \$345.05	\$334.78 \$345.05	\$373.50 \$384.95	\$372.50 \$384.95	\$257.66 \$265.35	\$257.46 \$265.35	\$285.93 \$294.70	\$285.92 \$294.70	\$428.71 \$441.86	\$428.71 \$441.05
20	\$340.95	\$240.95	\$645.92	\$645.92	\$633.86	\$633.86	\$603.54	\$603.54	\$477.73	\$477.73	\$500.33	\$500.33	\$463.14	\$463.14	\$458.61	\$458.61	5333.23	\$333.23	\$322.04	\$322.04	\$369.70	\$369.70	\$539.61	\$539.61	\$437.15	\$437.15	\$\$10.85	\$510.85	\$399.78	\$399.78	\$355.68	\$355.68	\$396.82	\$396.82	\$273.53	\$273.53	\$303.78	\$303.78	\$455.47	\$455.47
21	\$351.49 \$351.49	\$395.43 \$395.43	\$665.90	\$749.14 \$749.14	\$653.46 \$653.46	\$735.14 \$735.14	\$622.21 \$622.21	\$699.99 \$699.99	\$492.50 \$492.50	\$554.06 \$554.06	\$515.80 \$515.80	\$580.28 \$580.28	\$477.46 \$477.46	\$537.14 \$537.14	\$472.79 \$472.79	\$531.89 \$531.89	\$343.54 \$343.54	\$286.48 \$286.48	\$332.00 \$332.00	\$373.50 \$373.50	\$381.13	\$429.77 \$429.77	\$556.30 \$556.30	\$625.84 \$625.84	\$450.67 \$450.67	\$507.00 \$507.00	\$526.65 \$526.65	\$592.48 \$592.48	\$412.14 \$412.14	\$463.66 \$463.66	\$366.68 \$366.68	\$412.52 \$412.52	\$409.09 \$409.09	\$460.23		\$317.24 \$317.24	\$313.18	\$352.33 \$352.33	\$469.56 \$469.56	\$528.26 \$538.36
22	5351.49	5395.43	\$665.90 \$665.90	5749.14 5749.14	5653.46	5735.14 5735.14	5622.21	5699.99	5492.50	\$554.06 \$554.06	\$515.80 \$515.80	5580.28	\$477.46	9537.14	\$472.79	5531.89	5242.54	5286.48	\$222.00	\$272.50	\$381.13 \$381.13	5429.77	\$556.30	5625.84	\$450.67	\$507.00	5526.65	5592.48	S412.14	5463.66	5366.68	\$412.52 \$412.52	\$409.09	\$460.22		5317.24	\$313.18 \$313.18	5362.33	5469.56	5528.26 5528.26
24	\$351.49	\$395.43	\$665.90	\$749.14	\$653.46	\$735.14	\$622.21	\$699.99	\$492.50	\$554.06	\$515.80	\$580.28	\$477.46	\$537.14	\$472.79	\$531.89	\$242.54	\$386.48	\$332.00	\$373.50	5381.13	\$429.77	\$556.30	\$625.84	\$450.67	\$507.00	\$526.65	\$592.48	\$412.14	\$463.66	\$366.68	\$412.52	\$409.09	\$460.22	\$281.99	\$317.26	\$313.18	\$352.33	\$469.56	\$528.26
25	\$352.90 \$359.93	\$397.01 \$404.02	\$668.56 \$691.99	\$7\$2.12 \$767.12	\$656.07 \$669.54	\$739.08 \$752.79	\$624.70 \$637.14	\$702.79 \$716.79	\$494.47 \$504.32	\$556.28 \$567.36	\$517.86 \$528.18	\$582.60 \$594.20	\$479.37 \$488.92	\$539.29 \$550.03	\$474.68 \$484.54	\$534.02 \$544.65	\$344.91 \$351.70	\$288.03 \$295.76	\$222.22 \$229.97	\$374.99 \$393.46	\$382.65 \$390.28	\$430.49 \$439.06	\$558.53 23.6922	\$628.34 \$640.86	\$452.47 \$461.49	\$509.03 \$519.17	\$528.76 \$539.29	\$594.85 \$606.70	\$413.79 \$422.03	\$465.51 \$474.70	\$368.15 \$375.48	\$414.17 \$422.42	\$410.72 \$418.91	\$462.07 \$471.27	\$283.12 \$289.76	\$318.51 \$324.85	\$314.43 \$320.70	\$353.74 \$360.78	\$471.44 \$480.83	\$\$30.37 \$\$40.90
27	\$368.36	\$414.41	\$697.86	\$785.10	\$684.83	\$770.43	\$652.08	\$733.59	\$516.14	\$590.66	\$540.56	\$609.13	\$500.38	\$562.93	\$495.48	\$557.42	\$360.03	\$405.03	\$347.94	\$391.43	\$399.42	\$449.35	\$583.00	\$655.88	\$472.30	\$531.34	\$551.93	\$620.92	\$431.92	\$485.91	5384.28	\$432.32	\$429.72	\$492.32	\$295.53	\$332.47	\$328.21	\$369.24	\$492.10	\$553.61
28	\$282.07 \$293.32	\$429.83 \$442.48	\$723.83	\$814.31 \$838.28	\$710.31 \$731.22	\$799.10 \$822.62	\$676.34 \$696.25	\$760.89 \$783.28	\$535.35 \$551.11	\$602.27 \$620.00	\$560.67 \$577.18	\$630.76 \$649.33	\$519.00 \$534.28	\$583.87 \$601.06	\$513.92 \$529.05	\$578.16 \$595.18	\$372.43 \$384.42	\$420.11 \$432.47	\$360.88 \$371.51	\$405.99 \$417.95	\$414.29 \$426.48	\$466.07 \$479.80	\$604.70 \$622.50	\$680.29 \$700.31	\$489.88 \$504.30	\$551.11 \$567.34	\$\$72.47 \$\$89.32	\$644.03 \$662.99	\$448.00 \$461.18	\$504.00 \$518.83	\$298.58 \$410.31	\$448.40 \$461.60	\$444.68 \$457.77	\$500.27 \$514.99		\$344.84 \$354.99	\$340.43 \$350.45	\$392.98 \$394.25	\$510.41 \$525.44	\$\$74.21 \$\$91.12
30	5298.94	\$468.76	\$745.14 \$755.80	5888.06	5741.68	\$871.47	\$206.21	5829.79	5558.99	\$656.81	\$585.43	5687.88	5541.92	\$636.75	5536.62	\$690.52	5389.92	\$458.15	5276.82	\$417.95	5432.58	\$479.80 \$508.28	\$631.40	\$741.90	\$504.50 \$511.51	5601.02	5597.25	5202.35	\$467.78	\$549.64	\$416.18	5489.01	\$464.32	\$545.57		5336.07	\$355.46	5417.66	5532.95	5626.22
31	\$607.28	\$478.67	\$771.78	\$906.84	\$7\$7.36	\$889.90	\$721.14	\$847.34	\$570.81	\$670.70	\$597.81	\$702.43	\$553.38	\$650.22	\$\$47.96	\$643.86	\$399.16	\$467.84	\$284.29	\$452.13	\$441.72	\$519.03	\$644.75	\$7\$7.58	\$522.33	\$613.72	\$610.29	\$717.21	\$477.67	\$561.26	\$424.98	\$499.35	\$474.14	\$557.11	\$326.83	\$384.02	\$362.98	\$426.50	\$544.22	\$639.46
32	\$415.81 \$421.09	\$488.58 \$494.77	\$287.76 \$297.25	\$925.62 \$937.35	\$773.04 \$782.85	\$909.33 \$919.84	\$736.07 \$745.41	\$864.89 \$875.85	\$582.63 \$590.02	\$684.59 \$693.22	\$610.19 \$617.99	\$716.97 \$726.07	\$564.84 \$572.00	\$663.68 \$672.10	\$559.31 \$566.40	\$667.19 \$665.52	\$406.41 \$411.56	\$477.53 \$483.58	\$292.76 \$297.74	\$461.49 \$467.34	\$450.88 \$456.59	\$529.78 \$536.50	\$658.50 \$666.45	\$773.27 \$783.08	\$533.14 \$539.90	\$626.44 \$634.39	\$623.03 \$630.93	\$732.06 \$741.34	\$497.56 \$493.74	\$\$72.88 \$580.15	\$433.78 \$439.28	\$509.69 \$516.16	\$483.95 \$490.09	\$568.65 \$575.86	\$222.59 \$227.82	\$395.97 \$396.94	\$370.49 \$375.19	\$435.33 SM0.95	\$555.49 \$562.53	\$652.70 \$660.00
34	\$426.71	\$501.38	\$808.40	\$949.87	\$799.30	\$992.13	\$755.36	\$887.55	\$597.90	\$702.53	\$626.18	\$725.76	\$579.64	\$681.07	\$\$73.97	\$674.41	\$417.06	\$490.04	\$403.05	\$472.58	\$462.69	\$543.66	\$675.35	\$792.52	\$547.11	\$642.86	\$639.35	\$751.24	\$500.34	\$587.90	\$445.15	\$523.05	\$496.64	\$583.55	\$342.34	\$402.34	\$380.20	\$446.74	\$570.05	\$669.80
35	\$429.52	\$504.69	\$813.73	\$956.13	\$798.53	\$938.27	\$760.34	\$893.40	\$601.84	\$707.16	\$630.31	\$740.61	\$583.46	\$685.56	\$\$77.25	\$678.86	\$419.81	\$493.27	\$405.70	\$476.70	\$465.74	\$547.25	\$679.80	\$798.76	\$550.72	\$647.09	\$643.57	\$756.19	\$509.64	\$591.77	\$448.08	\$536.50	\$499.91	\$587.39	\$344.59	\$404.90	\$382.71	\$449.68	\$573.80	\$634.22
36 37	\$432.33 \$435.14	\$507.99 \$511.29	\$819.06 \$824.38	\$962.39 \$968.65	\$809.76 \$809.98	\$944.41 \$950.56	\$765.32 \$770.30	\$899.25 \$905.10	\$605.78 \$609.72	\$711.79 \$716.42	\$634.43 \$638.56	\$745.46 \$750.31	\$587.28 \$591.10	\$690.05 \$694.54	\$581.53 \$585.31	\$683.30 \$687.74	\$422.55 \$425.30	\$496.50 \$499.73	\$408.36 \$411.02	\$479.82 \$482.94	\$468.79 \$471.84	\$550.83 \$554.41	\$684.25 \$688.70	\$803.99 \$809.22	\$554.32 \$557.93	\$651.33 \$655.57	\$647.78 \$651.99	\$761.14 \$766.09	\$506.93 \$510.23	\$595.65 \$599.57	\$451.02 \$453.95	\$529.94 \$533.39	\$509.18 \$506.45	\$591.24 \$595.08	\$346.85 \$349.10	\$407.55 \$410.20	\$385.21 \$387.72	\$452.62 \$455.57	\$577.56 \$581.32	\$678.63 \$683.05
38	\$437.96	\$514.60	\$829.71	\$974.91	\$814.21	\$956.70	\$775.27	\$910.95	\$613.66	\$721.04	\$642.69	\$755.16	\$594.92	\$699.03	\$589.50	\$692.19	\$428.05	\$502.96	\$413.67	\$486.06	\$474.89	\$557.99	\$693.15	\$814.45	\$561.53	\$659.80	\$656.21	\$771.04	\$513.53	\$603.39	\$456.88	\$536.84	\$509.72	\$598.93	\$351.36	\$412.85	\$390.22	\$458.51	\$585.07	\$687.46
20	\$643.58 \$649.20	\$521.21 \$550.28	\$860.37 \$851.02	\$987.43 \$1.042.50	\$824.67 \$835.12	\$968.98 \$1,023.02	\$785.23 \$785.18	\$922.64 \$974.10	\$621.54 \$629.42	\$730.30 \$771.03	\$650.94 \$659.19	\$764.85 \$807.51	\$602.55 \$610.19	\$708.00 \$747.49	\$596.66 \$604.23	\$701.08 \$740.18	\$433.55 \$439.04	\$509.42 \$537.83	\$418.98 \$424.30	\$492.31 \$519.76	\$480.99 \$487.08	\$565.16 \$596.68	\$702.05 \$710.95	\$824.91 \$870.92	\$548.75 \$575.96	\$668.28 \$705.55	\$664.63 \$673.06	\$780.94 \$834.50	\$520.12 \$526.71	\$611.14 \$645.22	\$462.75 \$468.62	\$543.73 \$574.06	\$516.27 \$522.82	\$606.62 \$640.45	\$355.87 \$360.38	S418.15 S441.47	\$395.23 \$400.24	\$464.40 \$490.30	\$592.58 \$600.10	\$696.29 \$235.12
41	\$457.64	\$560.61	\$867.00	\$1,062.08	\$850.80	\$1,042.24	\$810.12	\$992.39	\$641.24	\$785.51	\$671.57	\$822.68	\$621.65	\$761.52	\$615.57	\$754.08	\$447.29	\$547.93	\$432.26	\$529.52	\$496.23	\$607.88	\$724.30	\$887.27	\$586.77	\$718.80	\$685.70	5829.98	\$536.61	\$657.34	\$477.42	\$584.84	\$532.64	\$652.48	\$367.15	\$449.76	\$407.76	\$499.51	\$611.37	\$748.92
42	\$665.72 \$676.97	\$570.51 \$584.29		\$1,080.84	\$865.83 \$886.75	\$1,060.65 \$1,086.26	\$824.43 \$844.34	\$1,009.92 \$1,034.32	\$652.56 \$668.32	\$799.29 \$818.70	\$683.44 \$699.94	\$897.21 \$857.49	\$632.63 \$647.91	\$774.98 \$793.69	\$636.45 \$641.58	\$767.40 \$785.93	\$455.19 \$466.18	\$557.61 \$571.08	\$439.90 \$450.52	\$538.88 \$551.89	\$505.00	\$618.62 \$633.56	\$737.10 \$754.90	\$902.94 \$924.75	\$597.14	\$731.49 \$749.16	\$697.81	\$854.82 \$875.46	\$546.09 \$559.27	\$668.95 \$685.11	\$485.85 \$497.58	\$595.17 \$609.54	\$542.04 \$555.14	\$664.00 \$680.04	\$273.64 \$282.66	\$457.71 \$468.76	\$414.96 \$424.99	\$508.33 \$520.61	\$622.17 \$637.19	\$762.15 \$780.56
43	\$476.97 \$491.03	\$584.29 \$601.51		\$1,106.94	\$886.75 \$912.88	\$1,086.26 \$1,118.28	5864.34 5869.23	\$1,094.92 \$1,064.90	\$668.02 \$688.02	\$818.70 \$842.83	\$699.94 \$720.57	\$857.43 \$882.70	\$647.91 \$667.01	\$793.69 \$817.09	\$641.58 \$660.49	\$785.93 \$809.10	\$466.18 \$479.93	\$571.08 \$587.91	\$450.52 \$463.80	\$551.89 \$568.16	\$517.19 \$532.44	\$633.56 \$652.24	\$754.90 \$777.15	9924.75 9952.01	\$611.56 \$629.59	\$749.16 \$771.24	\$714.66 \$735.73	5875.46 5901.27	\$559.27 \$575.76	\$685.11 \$705.31	\$497.58 \$512.25	\$609.54 \$627.51	\$555.14 \$571.50	\$680.04 \$700.09	\$392.66 \$393.94	5468.76 5482.58	\$424.99 \$437.51	\$520.61 \$535.95	\$637.19 \$655.98	\$780.56 \$803.57
45	\$507.55	\$621.75	\$961.56	\$1,177.91	\$943.60	\$1,155.91	\$898.47	\$1,100.63	\$711.17	\$871.18	\$744.82	\$912.40	\$689.45	\$844.58	\$682.71	\$836.32	\$496.07	\$607.69	\$479.41	\$587.27	\$550.35	\$674.18	\$803.30	\$984.04	\$650.77	\$797.19	\$760.48	\$931.59	\$595.13	\$729.03	\$529.49	\$648.62	\$590.72	\$723.64	\$407.19	\$499.81	\$452.23	\$553.98	\$678.04	\$830.60
46	\$527.24 \$549.38	\$645.86 \$672.99		\$1,223.59	\$990.19 \$1,021.36	\$1,200.72 \$1,251.16	5933.32 5972.51	\$1,143.31 \$1,191.33	\$728.75 \$769.78	\$904.97 \$942.98	\$773.70 \$806.20	\$947.78 \$987.59	\$716.19 \$746.27	\$877.33 \$914.18	\$709.19 \$738.97	\$868.75 \$905.24	\$515.31 \$536.95	\$631.25 \$657.77	\$498.00 \$518.92	\$610.05 \$635.67	\$571.70 \$595.71	\$700.33 \$729.74	\$834.45 \$869.50	\$1,022.20 \$1,065.13	\$676.01 \$704.40	\$828.11 \$862.89	\$789.98 \$823.15	\$967.72 \$1,008.36	\$618.21 \$644.17	\$757.31 \$789.11	\$\$\$0.02 \$\$73.12	\$673.77 \$702.07	\$613.64 \$639.41	\$7\$1.70 \$783.27	\$422.99 \$440.75	\$518.16 \$529.92	\$469.77 \$489.50	\$575.47 \$599.64	\$704.34 \$733.92	\$862.82 \$899.05
48	\$574.69	\$703.99	\$1,088.75	\$1,222.71	\$1,068.41	\$1,308.80	\$1,017.31	\$1,246.21	\$805.24	5986.42	\$843.33	\$1,033.08	\$780.65	\$956.29	\$773.01	\$946.94	\$561.69	\$688.07	\$542.82	\$664.95	\$623.15	\$763.36	\$909.55	\$1,114.20	\$726.85	\$902.64	\$861.07	\$1,054.81	\$672.85	\$825.46	\$599.52	\$734.41	\$668.86	\$819.36	\$461.05	\$564.29	\$512.05	\$627.26	\$267.73	\$940.47
49	\$599.64 \$627.76	\$734.56 \$863.17		\$1,391.63 \$1,635.28	\$1,114.80	\$1,365.63 \$1,604.73	\$1,061.49	\$1,300.33 \$1,527.99	\$840.21 \$879.61	\$1,029.25 \$1,209.46	\$829.95 \$921.22	\$1,077.94 \$1,266.68	\$814.55 \$852.74	\$997.82 \$1.172.52	\$806.58 \$844.40	\$988.06 \$1.161.05	\$586.08 \$613.56	\$717.95 \$843.65	\$566.39 \$592.95	\$693.83 \$815.31	\$650.21 \$680.70	\$796.50 \$935.96	\$949.05 \$993.55	\$1,162.58	\$768.84 \$804.90	\$941.83 \$1.106.73	\$898.46 \$940.60	\$1,100.62 \$1,293.32	\$709.11 \$736.08	\$861.31 \$1.012.11	\$625.56 \$654.89	\$766.31 \$900.47	\$697.91 \$730.63	\$854.94 \$1,004.62	\$481.07 \$503.63	\$589.32 \$692.50	\$534.29 \$559.34	\$654.50 \$769.09	\$801.07 \$838.63	\$981.31 \$1.153.12
51 51	\$655.53	\$901.35	\$1,241.90	\$1,707.62	\$1,218.70	\$1,675.72	\$1,160.42	\$1,595.58	\$918.51	\$1,262.95	\$961.97	\$1,322.70	\$890.46	\$1,224.39	\$881.75	\$1,212.41	\$640.70	\$880.97	\$619.18	\$851.37	\$710.81	\$977.36	\$1,097.50	\$1,426.56	\$840.50	\$1,155.69	\$982.20	\$1,350.53	\$768.64	\$1,056.88	\$683.86	\$940.31	\$762.95	\$1,049.06	\$525.91	\$723.13	\$584.08	\$803.11	\$875.73	\$1,204.13
52	\$686.11	\$943.40		\$1,787.28	\$1,275.55	\$1,753.89	\$1,214.55	\$1,670.01	\$961.36	\$1,321.87	\$1,006.84	\$1,384.41	\$992.00	\$1,281.50	\$922.89	\$1,268.97	\$670.59	\$922.06	\$648.06	\$891.09	\$743.97	\$1,022.95	\$1,085.90		\$879.71	\$1,209.60	\$1,028.02	\$1,413.53	\$804.50	\$1,106.18	\$715.76	\$994.17		\$1,099.00	\$550.44	\$756.86	\$611.33	\$840.58	\$916.58	\$1,260.30
Ω ω	\$717.04 \$750.43	\$985.93 \$1,031.84	\$1,358.44 \$1.421.70	\$1,867.85 \$1,954.83	\$1,333.06	\$1,832.96 \$1,918.31	\$1,269.31 \$1,328.42	\$1,745.30 \$1,826.58	\$1,004.70 \$1,051.49	\$1,281.46 \$1,445.80	\$1,052.23 \$1,101.23	\$1,446.82 \$1,514.20	\$974.02 \$1.019.38	\$1,339.28 \$1,401.64	\$964.49 \$1,009.41	\$1,326.18 \$1,387.93	\$700.82 \$722.46	\$963.63 \$1,008.50	\$677.28 \$708.82	\$931.26 \$974.63	\$777.51 \$813.71	\$1,069.07	\$1,134.85 \$1,187.70	\$1,560.42 \$1,633.09	\$919.37 \$962.18	\$1,264.13 \$1,323.00	\$1,074.37 \$1,124.60	\$1,477.25 \$1,546.05	\$840.77 \$879.92	\$1,156.05 \$1,209.89	\$748.03 \$782.86	\$1,028.54 \$1,036.43		\$1,147.50 \$1,200.93	\$575.26 \$602.05	\$790.98 \$827.82	\$638.89 \$668.64	\$878.47 \$919.38	\$957.90 \$1.002.51	\$1,317.12 \$1,328.45
22	\$783.82	\$1,077.76	\$1,484.96	\$2,041.82	\$1,457.22	\$2,003.67	\$1,287.52	\$1,907.85	\$1,098.28	\$1,510.13	\$1,150.23	\$1,581.57	\$1,064.74	\$1,464.01	\$1,054.32	\$1,449.69	\$766.09	\$1,053.38	\$760.36	\$1,018.00	\$849.92	\$1,168.64	\$1,240.55	\$1,705.75	\$1,004.99	\$1,381.87	\$1,174.43	\$1,614.84	\$919.07	\$1,263.72	\$817.70	\$1,124.33	\$912.27	\$1,254.37	\$628.84	\$864.65	\$699.39	\$960.29	\$1,047.12	\$1,439.79
56	\$820.03 \$856.58	\$1,127.54 \$1,177.80		\$2,136.12 \$2,231.35	\$1,524.52 \$1,592.48	\$2,096-22 \$2,189.66	\$1,451.62	\$1,995.97 \$2,094.95	\$1,149.00 \$1,200.22	\$1,579.88	\$1,209.36 \$1,257.00	\$1,654.62 \$1,728.38	\$1,113.91	\$1,531.63	\$1,109.02 \$1.152.19	\$1,516.65 \$1,584.26	\$801.48 \$837.21	\$1,102.03		\$1,065.01	\$889.18 \$928.81	\$1,222.62 \$1,277.12	\$1,297.85 \$1,355.70	\$1,784.54	\$1,051.41 \$1,098.28	\$1,445.69	\$1,228.67 \$1,283.45	\$1,689.43 \$1,764.74	\$961.52 \$1.004.39	\$1,322.09 \$1,381.03	\$855.46 \$893.60	\$1,176.26 \$1,228.70		\$1,312.31 \$1,370.81		\$904.99 \$944.95	\$790.65 \$763.22	\$1,004.64	\$1,095.48 \$1,144.32	\$1,506.29 \$1,573.44
58	\$895.60	\$1,231.45	\$1,696.71	\$2,332.98	\$1,665.02	\$2,289.40	\$1,585.39	\$2,179.91	\$1,254.89	\$1,725.47	\$1,314.26	\$1,807.11	\$1,216.57	\$1,672.78	\$1,204.67	\$1,656.42	\$875.34	\$1,203.59	\$845.94	\$1,163.16	\$971.12	\$1,335.29	\$1,417.45	\$1,949.00	\$1,148.31	\$1,578.92	\$1,341.90	\$1,845.12	\$1,050.13	\$1,443.93	\$994.90	\$1,284.66	\$1,042.36	\$1,422.25	\$718.51	\$987.95	\$797.98	\$1,097.23	\$1,196.44	\$1,645.10
59	\$914.93	\$1,258.03		\$2,383.34	\$1,700.96	\$2,339.92	\$1,619.61	\$2,226.97	\$1,281.98	\$1,762.72	\$1,342.63	\$1,846.11	\$1,242.83	\$1,708.89	\$1,230.67	\$1,692.17	\$894.22	\$1,229.57	\$864.20	\$1,188.27	\$992.08	\$1,364.11	\$1,448.05	\$1,991.07	\$1,179.09	\$1,613.00	\$1,370.87	\$1,884.95		\$1,475.10	\$954.47	\$1,312.39		\$1,464.18		\$1,009.28	\$815.21	\$1,120.91	\$1,222.26	\$1,680.61
60	\$953.94 \$987.69	\$1,311.67		\$2,484.97	\$1,773.49	\$2,438.55 \$2,524.81	\$1,688.68 \$1,748.41		\$1,336.65	\$1,837.89 \$1,902.90	\$1,299.88 \$1,449.40	\$1,924.84	\$1,295.83	\$1,781.76	\$1,283.15 \$1,339.54	\$1,764.33	\$932.37 \$965.35	\$1,282.01	\$901.05	\$1,228.94 \$1,282.77	\$1,034.39	\$1,422.28 \$1,472.59	\$1,509.80	\$2,075.97		\$1,681.79 \$1,741.28	\$1,429.33 \$1,479.89	\$1,965.33 \$2,034.84	\$1,118.55 \$1,158.11	\$1,538.00	\$995.17	\$1,368.36 \$1,416.76	\$1,110.27 \$1,149.54	\$1,526.62 \$1,580.62		\$1,052.32 \$1,062.32	\$849.97 \$880.04	\$1,168.71	\$1,274.39 \$1,319.46	\$1,752.28 \$1,854.26
62	\$1,009.83	\$1,388.52	\$1,913.13	\$2,630.55	\$1,877.39	\$2,581.41	\$1,787.61	\$2,457.96	\$1,414.95	\$1,945.56	\$1,481.89	\$2,097.60	\$1,371.74	\$1,886.15	\$1,358.33	\$1,867.70	5986.99	\$1,357.11	\$953.84	\$1,311.52	\$1,094.99	\$1,505.61	\$1,598.25	\$2,197.59	\$1,294.77	\$1,780.32	\$1,513.07	\$2,090.46	\$1,184.08	\$1,628.11	\$1,053.47	\$1,448.52	\$1,175.32	\$1,616.06	\$810.16	51,113.97	\$899.77		\$1,319.05	\$1,854.94 \$1,854.94
61	\$1,037.60	\$1,426.70 \$1,440.00	\$1,965.74	\$2,702.89	\$1,929.01 \$1,960.38	\$2,652.39	\$1,836.76	\$2,525.55 \$2,566.62	\$1,453.86	\$1,999.06	\$1,522.64	\$2,093.63	\$1,409.46	\$1,938.01	\$1,395.68	\$1,919.05	\$1,014.13	\$1,294.43 \$1,417.10	\$990.06	\$1,347.59	\$1,125.10 \$1,143.39	\$1,547.01	\$1,642.20	\$2,258.02	\$1,330.38	\$1,829.27	\$1,554.67	\$2,127.67	\$1,216.64	\$1,672.88	\$1,092.44	\$1,488.35 \$1,512.56	\$1,207.63 \$1,227.27	\$1,660.50	\$832.43 1 \$845.97 1	\$1,144.60 \$1,163.21	\$924.51	\$1,271.20	\$1,386.14 \$1,408.68	\$1,905.94
	94,09E47	24,009.90	94,997.70	24,710.86	94,960.88	24,495.52	*******	94,000.02	pa,n//30	94,051.55	94,047.00	24,447.68	84,7442.48	94,999.52	********	64,490Jb	es,us0.b2	94,917.10	##99.00	ex,m930	24,455.59	94,972.16	##,##X.90	22,296.76	#4,##Z.U1	##,##9UI	34,479.95	94,472.44	24,486.62	94,700.08	94,002.04	54,54Z3b	84,447.27	94,00130	para.97	74,480.J1	pre#.54	01,09187	94,9078.608	sa,sm.el

Page Number: 1

IAC Insurance Company Small Group Plan Design Summary

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HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
44415PA0010001	Personal Choice EPO Silver HSA-0 \$3,000/80%	EPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020001	Personal Choice PPO Platinum Preferred \$10/\$20/\$150	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020002	Personal Choice PPO Platinum Preferred \$10/\$20/\$200	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020003	Personal Choice PPO Platinum Preferred \$20/\$40/\$250	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020004	Personal Choice PPO Gold Preferred \$40/\$80/\$600	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020005	Personal Choice PPO Gold Preferred \$40/\$80/\$500	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020006	Personal Choice PPO Gold Classic \$1,500/\$20/\$40/80%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020007	Personal Choice PPO Gold Classic \$2,500/\$40/\$80/90%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020008	Personal Choice PPO Silver Secure \$4,750/\$40/\$80/\$600	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020009	Personal Choice PPO Silver Classic \$5,000/\$50/\$100/90%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020010	Personal Choice PPO Silver Classic \$3,800/\$40/\$80/70%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020011	Personal Choice PPO Platinum HSA-50 \$1,800/100%	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020012	Personal Choice PPO Gold HSA-25 \$2,400/\$25/\$50/90%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020013	Personal Choice PPO Gold HSA-0 \$2,200/100%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020014	Personal Choice PPO Silver HSA-0 \$4,400/100%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020015	Personal Choice PPO Silver HSA-0 \$2,400/70%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020016	Personal Choice PPO Silver HSA-0 \$3,600/90%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020017	Personal Choice PPO Bronze HSA-0 \$5,600/50%	PPO	Bronze	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020018	Personal Choice PPO Bronze HSA-0 \$8,000/100%	PPO	Bronze	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020019	Personal Choice PPO Gold HRA-20 \$4,000/100%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
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| Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Secondary | Seco

Company Name Market Product Effective Date of Rates	Small s	iroup O			linding date of	Rates	June 2	0, 2025	ı																															
HIOS Plan ID (On Exchange):>																																								
HIOS Plan ID (Off Exchange) 12 Plan Marketing Name 12	44415PA		44415PADS bice PPO Platinum	0001	4441598	0020002	4441581	10020003		A0020004	44415PAD		4441598		4441598		4441598		4441598		44415P#		4441598		44415P#		44415960		44415PAG		44415960		44415PA00		4441598		44415PA			PA0020019
Farm.ft 12			16884-BC.SG.OR																																					
Rating Area 12 Network 12	Personal Cho	ice Network	Personal Choice	Network	Personal Cho	ice Network	Personal Ch	pice Network	Personal Ch	pice Network	Personal Choic	ce Network	Personal Cho	ice Network	Personal Chi	ice Network	Personal Cho	ice Network	Personal Cho	ice Network	Personal Chr	ice Network	Personal Cho	ice Network	Personal Chr	oice Network	Perspeal Choi	ice Network	Personal Choi	ce Network	Personal Chair	or Network	Personal Choic	e Network	Personal Cho	ice Network	Personal Cho	ice Network	Personal C	Choice Network
Metal to	Sh	er ne	Platinus		Place			ioum		ield	Gold		Go	ld	G	id	Sh	er	Sib		9	er	Plati	SUED.	- 6	old	Gol	d	Silve	ы	She	Mr.	Silver		- Bro	100	Rose	cce	_	Gold
Deductible 15 Coinsurance 15	59,0		50	_	- 9	0		ie Ni		90 W	50		\$1J	.00	52,		54,		55,0	100	- S),		51,5			400 0%	52,2		54,4		52,6 201		53,60		\$5,6		58,3			53,700
Copays 15	20% after ded/		\$10/52		\$10/	520	\$20	/\$40	540	(580	\$40/5	180		S40 no ded	\$40 no ded		\$40 no ded		\$50 no ded/t		\$40 no ded		0% afts	or ded	525	/550	0% after	r ded	9% afte	r ded	20% after		10% after	ded	50% aft		0% after	er ded		after ded
OOP Maximum to	58,1		\$3,000		53,1	500	54,	000	59.	200	\$7,50	00	58,1	00	\$7,	000	59,		59,2	100	59,	00	59,1	100	54,	,300	58,2	00	58,3		54,2	30	59,30	0	59,1		58,3	100	- 5	58,200
Pediatric Dental (Yes/No) 1> Are Rand	Non-Tobacca		Non-Tobacco	Tohana	Non-Tobacco	Yaharan	Non-Tobacco	Tabassa	Non-Tobacco	Tobares	Non-Tobacco	Tohoron	Non-Tobacco	Yebrers	Non-Tobacco	Yeberre	Non-Tobacco		Non-Tobacco	Yeberre	Non-Yebacca	S. Verbresse	Non-Tobacco	Yeberre	Non-Tobacco	Veh	Non-Tobacco	Yeberre	Non-Tobacco		Non-Tobacco	Yeberra B	ipe-Tobacco	Tohous	Ye Non-Tobacco		Non-Tobacco	Tohoron	Non-Tohace	Yes
0 - 14	5272.93	5272.93	\$\$17.06	5517.06	5507.39	550739	5442.14	5492 14	5282.42		SA00.51	\$400.51	5270.72	5220.22	000	5367.17	576676	5266.76	\$257.29	5357.76	\$765.0A	5295 94	5421.05	5431.66	5249.02	5349.92	Ca10.02	Cane on	\$220.0t	5220.01	539473	S284.22	5317.65	5317.65	C219.95	5319.66	5243.18	5242.10	C)64.60	
15	\$297.19	\$297.19	\$563.02	\$563.02	\$552.50	\$552.50	\$526.08	\$526.08	\$416.41	\$416.41	\$436.11	\$436.11	\$403.69	\$603.69	\$299.75	\$399.75	\$290.47	\$290.47	\$280.70	\$280.70	\$322.25	\$322.25	\$470.35	\$470.35	\$381.04	\$381.04	\$445.28	\$645.28	\$348.46	\$348.46	\$310.03	\$310.03	\$245.89	\$345.89	\$238.42	5238.42	\$264.79	\$264.79	\$397.01	
16	\$306.47 \$315.74	\$306.47 \$315.74	\$580.59 \$588.16	\$580.59	\$569.74 \$586.99	\$569.74 \$586.99	\$542.50 \$558.00	\$542.50 \$558.92	\$429.41 \$442.40	\$429.41 \$442.40	\$449.72 \$463.33	\$469.72 \$463.33	\$416.29 \$470.00	\$416.29 \$428.89	\$412.23 \$424.20	\$412.23 \$424.70	\$299.53 \$308.60	\$299.53 \$308.60	\$289.47 \$298.23	\$289.47 \$289.23	\$332.30 \$342.36	\$332.30 \$342.36	\$485.00 \$499.72	\$485.03 \$499.77	\$392.93 \$404.83	\$292.93 \$404.83	\$459.18 \$473.08	\$459.18 \$473.08	\$359.34 \$370.21	\$259.34 \$370.21	\$219.70 \$229.28	\$319.70 \$329.38	\$356.68 \$367.48	\$356.68 \$367.48	\$245.86 \$253.30	\$245.86 \$253.30	\$273.06 \$381.33	\$273.06 \$281.32	\$609.60 \$621.79	
17	\$315.74 \$325.73	\$315.74 \$325.73	\$598.16 \$617.09	\$598.16 \$617.09	\$586.99 \$605.56	\$586.99 \$605.56	\$558.92 \$576.61	\$558.92 \$576.61	\$442.40 \$456.40	\$642.60 \$456.60	\$463.33 \$477.99	\$463.33 \$477.99	\$428.89 \$442.46	\$428.89 \$442.46	\$434.70 \$438.54	\$424.70 \$438.14	\$308.60 \$318.36	\$308.60 \$318.36	\$298.23 \$307.66	\$298.23 \$307.66	\$342.36 \$353.19	\$342.36 \$353.19	\$499.72 \$515.53	\$699.72 \$515.53	\$404.83 \$417.63	\$404.93 \$417.63	\$473.08 \$488.04	\$473.08 \$488.04	\$370.21 \$381.93	\$370.21 \$381.93	\$329.38 \$339.80	\$329.38 \$339.80	\$367.48 \$379.10	\$367.48 \$379.10	\$253.30 \$261.32	\$253.30 \$261.32	\$291.32 \$290.22	\$291.32 \$290.22	\$421.79 \$435.14	
19	\$335.72	\$335.72	\$696.01	\$636.01	\$634.13	\$624.13	\$594.29	\$594.29	\$470.40		\$492.65	\$492.65	\$456.03	\$456.03	\$451.58	\$451.58	5328.13	\$328.13	\$317.00	\$317.10	\$364.03	\$364.03	\$531.34	\$531.34	\$430.44	\$430.44	\$503.01	\$503.01	\$393.64	\$393.64	\$350.22	\$350.22	\$390.73	\$390.72	\$269.33	\$269.33	\$299.13	\$299.13	\$448.48	\$ \$448.48
20	\$346.07	\$346.07	\$655.61	\$655.61	\$643.36	\$643.36	\$612.60	\$612.60	\$484.89	\$484.89	\$507.83	\$507.83	\$470.08	\$470.08	\$465.49	\$465.49	\$338.24	\$338.24	\$326.87	\$326.87	\$375.24	\$375.24	\$\$47.71	\$547.71	\$443.71	\$449.71	\$518.51	\$518.51	\$405.77	\$405.77	\$361.01	\$361.01	\$402.77	\$402.77	\$277.63	\$277.63	\$308.34	\$309.34	\$462.30	
21	\$356.77 \$356.77	\$401.37 \$401.37	\$675.89 \$675.89	\$760.18 \$760.18	\$663.26 \$663.26	\$746.17 \$746.17	\$631.55	\$710.49 \$710.49	\$499.89 \$499.89	\$562.38 \$562.38	\$523.54 \$523.54	\$588.00 \$588.00	\$484.62 \$484.62	\$545.20 \$545.20	\$479.89 \$479.89	\$529.88 \$8.9522	\$348.70 \$349.70	\$292.29 \$292.29	\$236.98 \$236.98	\$379.10 \$379.10	\$186.85 \$186.85	\$435.21 \$435.21	\$564.65 \$564.65	\$635.23 \$635.23	\$457.43 \$457.43	\$514.61 \$514.61	\$534.55 \$534.55	\$601.37 \$601.37	\$418.32 \$418.32	\$470.61 \$470.61	\$372.18 \$372.18	\$418.70 \$418.70	\$415.22 \$415.22	\$467.13 \$467.13	\$286.22 \$286.22	\$322.00 \$322.00	\$317.88 \$317.88	\$367.62 \$367.63	\$476.60 \$476.60	
22	\$356.77	\$401.37	5675.89	5760.38	5663.26	5746.17	5631.55	5710.49	5499.89	\$562.38	5523.54	5588.08	5484.62	\$545.20	\$479.89	5529.88	5248.70	5392.29	5236.98	\$329.10	5386.85	5435.21	\$564.65	5635.23	5457.43	5514.61	\$534.55	5601.37	5418.32	5470.61	5372.18	5418.70	\$415.22	5467.13	5286.22	5322.00	5317.88	5357.62	\$476.60	
24	\$356.77	\$401.37	\$675.89	\$760.38	\$663.26	\$746.17	\$631.55	\$710.49	\$499.89		\$523.54	\$588.98	\$484.62	\$545.20	\$479.89	\$539.88	\$348.70	\$392.29	\$336.98	\$379.10	\$386.85	\$435.21	\$564.65	\$635.23	\$457.43	\$514.61	\$534.55	\$601.37	\$418.32	\$470.61	\$372.18	\$418.70	\$415.23	\$467.13	\$286.22	\$322.00	\$317.88	\$357.62	\$476.60	
25	\$358.20 \$365.33	\$402.97 \$411.00	\$678.59 \$692.11	\$763.42 \$778.63	\$665.91 \$679.18	\$749.15 \$764.08	\$634.08 \$646.71	\$713.34 \$727.55	\$501.89 \$511.89	\$564.63 \$575.87	\$525.63 \$536.50	\$591.34 \$603.12	\$496.56 \$496.25	\$547.98 \$558.28	\$481.81 \$491.41	\$542.04 \$552.83	\$350.09 \$357.07	\$292.86 \$601.70	\$228.22 \$245.07	\$380.62 \$388.20	\$388.40 \$396.13	\$436.95 \$445.65	\$566.91 \$578.20	\$637.77 \$650.48	\$459.26 \$468.41	\$516.67 \$526.96	\$536.69 \$547.38	\$603.77 \$615.80	\$419.99 \$429.36	\$472.49 \$481.90	\$273.67 \$281.11	\$420.38 \$428.75	\$416.89 \$425.20	\$469.00 \$478.34	\$297.96 \$293.09	\$323.29 \$329.73	\$319.15 \$325.51	\$359.05 \$366.20	\$478.51 \$499.04	
2h 27	5373.89	\$420.63	5208.23	\$778.68 \$796.97	\$695.00	5764.08 5701.00	566186	\$727.55 \$744.60	5523.88	5589.37	SS48.67	\$617.25	5507.66	\$571.37	5502.92	5565.29	5365.44	\$601.70 \$411.12	5353.56	539730	5405.42	\$456.10	\$\$78.20 \$\$91.25	5665.72	5479.39	5539.31	5567.28	5630.23	\$438.40	5493.20	5291.11	5428.90	\$435.16	5479LE6	5293.96	\$337.45	5325.55	5274.78	5499.49	
28	\$387.81	\$436.29	\$734.69	5826.53	\$720.96	\$811.08	\$686.49	\$772.31	\$543.38	\$611.30	\$549.09	\$640.22	\$526.78	\$592.63	\$521.64	\$586.85	\$379.04	\$426.42	\$366.30	\$412.08	\$420.51	\$479.07	\$613.77	\$690.50	\$497.22	\$559.38	\$581.06	\$653.69	\$454.71	\$511.55	\$404.56	\$455.13	\$451.36	\$507.77	\$311.12	\$350.01	\$345.54	\$388.73	\$518.06	\$582.82
29	\$299.23 \$604.93	\$449.13 \$475.80	\$756.32 \$767.14	\$850.86 \$901.38	\$742.19 \$7\$2.80	\$834.96 \$884.54	\$706.70 \$716.81	\$795.04 \$842.25	\$559.38 \$567.38	\$629.30 \$666.67	\$585.84 \$594.22	\$659.07 \$699.21	\$542.29 \$550.04	\$610.08 \$646.30	\$537.00 \$544.68	\$604.12 \$639.99	\$390.20 \$395.77	\$438.97 \$465.04	\$377.08 \$382.47	\$424.22 \$469.40	\$432.89 \$439.07	\$487.00 \$515.91	\$631.84 \$640.88	\$710.82 \$753.03	\$511.86 \$519.18	\$575.85 \$610.04	\$598.16 \$606.71	\$672.93 \$712.89	\$468.10 \$474.79	\$526.61 \$557.88	\$416.47 \$422.42	\$468.53 \$496.35	\$464.64 \$471.29	\$522.72 \$553.76	\$320.28 \$324.86	\$360.32 \$381.71	\$355.71 \$360.79	\$400.17 \$423.93	\$533.32 \$540.94	
31	\$413.50	\$485.86	5767.14	5920.44	5752.80 5768.72	5903.24	\$731.97	5860.06	\$529.37	5680.76	5696.22 5606.28	5712.97	\$561.67	5659.97	5556.19	5653.53	\$495.77 \$404.14	5474.87	\$290.56	5458.91	\$448.36	\$526.82	5654.43	5768.95	5530.16	\$610.04 \$622.94	5619.54	\$712.89 \$727.96	5494.83	\$569.68	5422.42	5506.84	\$481.25	\$565.47	5331.73	5389.78	\$360.79 \$368.43	5432.90	\$542.94 \$552.38	
32	\$422.06	\$495.92	\$299.58	\$939.50	\$784.64	\$921.95	\$747.12	\$877.87	\$591.37	\$694.86	\$619.35	\$727.72	\$572.21	\$673.63	\$567.71	\$667.06	\$412.51	\$494.70	\$398.65	\$468.41	\$457.64	\$537.72	\$667.98	\$784.88	\$541.14	\$635.84	\$632.37	\$743.04	\$494.87	\$581.48	\$440.29	\$517.34	\$491.22	\$577.18	\$338.60	\$397.85	\$376.06	\$441.86	\$563.82	\$662.49
33	\$427.41	\$502.21 \$508.91	\$809.72 \$809.53	\$951.42 \$964.12	\$794.59 \$805.30	\$933.64 \$986.11	\$756.60 \$766.70	\$889.00	\$598.87	\$703.67	\$627.20	\$736.96	\$580.57 \$580.33	\$682.18 \$691.29	\$\$74.91	\$675.52 \$684.54	\$417.74 \$422.22	\$490.85	\$403.70 \$409.00	\$474.35 \$480.60	\$463.45 \$469.64	\$544.55	\$676.45 \$695.49	\$794.83 \$805.44	\$548.00 6555.32	\$643.90	\$640.39 \$640.39	\$752.46	\$501.15	\$588.85 \$586.21	\$445.87 \$451.93	\$523.90	\$497.45 \$504.00	\$584.50 \$582.30	\$342.89 \$347.47	\$402.90 Sang 39	\$380.82 \$385.01	\$447.46 \$453.44	\$570.97	
34	\$433.12 \$435.97	\$508.91 \$512.27	\$820.53 \$825.94	5964.12 5970.48	\$805.20 \$810.50	\$946.11 \$962.34	\$766.70 \$771.75	\$900.87 \$906.81	\$606.87 \$610.87	\$713.07 \$717.77	\$635.58 \$639.77	\$746.80 \$751.72	\$588.33 \$592.21	\$691.29 \$695.94	\$582.59 \$586.43	5684.54 5689.05	\$429.32 \$426.11	\$497.40 \$500.68	\$411.79	\$480.69 \$483.85	\$472.72	\$551.82 \$555.46	\$695.49 \$690.00	\$805.44 \$810.75	\$555.32 \$558.98	\$652.50 \$656.80	\$668.94 \$653.22	\$762.51 \$767.53	\$507.84 \$511.19	\$596.71 \$600.64	\$451.83 \$454.80	\$530.90 \$534.39	\$504.09 \$507.41	\$592.30 \$596.21	\$347.47 \$349.76	\$408.28 \$410.97	\$385.91 \$388.45	\$453.44 \$456.43	\$578.59 \$582.41	
36	5438.83	\$515.62	5831.34	5976.83	5815.81	5958.58	\$776.81	5912.75	5614.86	\$722.47	5643.95	\$756.65	5596.08	5700.40	5590.26	5693.56	5428.90	\$503.96	5414.49	5487.02	5475.83	\$559.09	5694.52	5816.06	5562.64	5661.10	\$657.50	\$772.56	\$514.53	5604.58	\$457.78	5527.89	\$510.73	5600.11	5352.05	\$413.66	5390.99	5459.42	5586.22	
37	\$441.68	\$518.98	\$836.75	\$983.18	\$821.12	\$964.81	\$781.86	\$918.68	\$618.86	\$727.16	\$648.54	\$761.57	\$599.96	\$704.95	\$594.00	\$698.07	\$431.69	\$507.24	\$417.18	\$490.19	\$478.92	\$562.72	\$699.04	5821.37	\$566.30	\$665.40	\$661.77	\$777.58	\$517.88	\$609.51	\$460.76	\$541.39	\$514.05	\$604.01	\$354.34	\$416.35	\$393.54	\$462.40	\$590.03	
28	\$664.54 \$650.24	\$522.33 \$529.04	\$842.16 \$852.97	\$989.54	\$826.42 \$837.09	\$971.05 \$983.52	\$786.91 \$797.02	\$924.62 \$936.49	\$622.86 \$630.86	\$731.86 \$741.26	\$652.33 \$660.71	\$766.49 \$776.33	\$603.84 \$611.59	\$709.51 \$718.62	\$597.94 \$605.62	\$702.58 \$711.60	\$434.48 \$440.06	\$510.51 \$517.07	\$419.88 \$425.27	\$493.36 \$499.69	\$482.02 \$488.20	\$566.37 \$573.64	\$703.55 \$712.59	\$826.68 \$837.29	\$569.96 \$577.28	\$669.70 \$678.30	\$666.05 \$674.60	\$782.61 \$792.66	\$521.23 \$527.92	\$612.44 \$620.31	\$469.69 \$469.69	SS44.89 SSS1.89	\$517.38 \$524.02	\$607.92 \$615.72	\$356.63 \$361.21	\$419.04 \$424.42	\$396.08 \$401.16	\$465.39 \$471.37	\$593.84 \$601.47	
40	\$455.95	\$529.04 \$558.54		1,002.24	5847.65	\$1,038.37	5997.02	5988.72	5638.86	5782.60	5669.08	5819.63	5619.34	5718.62	\$613.30	575129	SAAS GA	\$545.91	\$420.66	5527.56	5498.20 5494.20	\$605.63	\$712.59 \$721.62	5883.99	\$584.60	5716.13	569315	5836.86	\$534.61	\$620.91 \$654.90	\$475.65	5582.67	\$530.66	5650.06	5365.79	S448.09	\$406.25	5497.66	\$609.09	
41	\$464.51	\$569.03	\$880.01	1,078.01	\$863.56	\$1,057.87	\$822.28	\$1,007.29	\$650.86	\$297.30	\$681.65	\$835.02	\$630.98	\$772.94	\$634.82	\$765.40	\$454.01	\$556.16	\$438.75	\$537.47	\$503.68	\$617.01	\$735.17	\$900.59	\$595.57	\$729.58	\$695.98	\$852.58	\$544.65	\$667.20	\$484.58	\$599.61	\$540.63	\$662.27	\$372.66	\$456.51	\$413.88	\$507.00	\$620.53	\$760.15
42	\$472.72 \$484.14	\$579.08 \$599.07		1,097.05	\$878.82 \$900.04	\$1,076.55	\$836.80 \$857.01	\$1,025.08 \$1,049.84	\$662.35 \$678.35	\$811.38 \$830.98	\$693.69 \$710.44	\$849.77 \$870.29	\$642.12 \$657.63	\$786.60 \$805.60	\$635.85 \$651.21	\$778.92 \$797.23	\$462.03 \$472.19	\$565.98 \$579.65	\$466.50 \$457.28	\$546.96 \$560.17	\$512.58 \$524.96	\$627.91 \$643.07	\$748.16 \$766.23	\$916.50 \$938.63	\$606.09 \$620.73	\$742.47 \$760.40	\$708.28 \$725.38	\$867.64 \$869.60	\$554.27 \$567.66	\$678.99 \$695.30	\$493.14 \$505.05	\$604.09 \$618.68	\$550.18 \$563.47	\$673.97 \$690.25	\$379.24 \$388.40	\$464.57 \$475.29	\$421.19 \$431.36	\$515.96 \$528.42	\$631.50 \$646.75	
44	5498.41	\$610.55		1.156.67	5926.57	\$1,102.55	5892.28	\$1,089.84	\$698.35	5855.47	5731.39	5895.95	\$677.01	5829.34	\$620.41	592125	5497.13	\$596.74	\$470.26 \$470.26	5576.68	\$540.43	5662.03	5788.82	5966.30	5639.03	5782.81	\$725.28 \$786.77	5914.79	5584.39	5715.88	5519.94	5636.92	\$580.08	\$710.59	5299.85	5489.82	5444.08	\$544.00	5665.81	
45	\$515.18	\$631.09	\$975.99	1,195.58	\$957.25	\$1,179.24	\$911.96	\$1,117.15	\$721.84	\$884.26	\$755.99	\$926.09	\$699.79	\$857.24	\$692.96	\$848.88	\$503.52	\$616.82	\$486.60	\$596.08	\$558.61	\$694.30	\$815.35	\$998.81	\$660.53	\$809.15	\$771.89	\$945.57	\$604.05	\$729.97	\$537.43	\$658.35	\$599.59	\$724.50	\$413.30	\$506.29	\$459.02	\$562.30	\$688.21	\$843.06
46	\$535.16 \$557.63	\$655.56 \$683.10		1,241.95	\$994.89 \$1,036.68	\$1,218.74 \$1,269.93	\$947.33 \$987.11	\$1,160.47 \$1,209.21	\$749.84 \$781.33	\$918.55 \$957.13	\$785.31 \$818.29	\$962.00 \$1.002.41	\$726.93 \$757.46	\$890.49 \$927.99	\$719.84 \$750.07	\$881.80 \$918.83	\$523.05 \$545.02	\$640.74 \$667.65	\$505.47 \$526.70	\$619.20 \$645.21	\$580.28 \$604.65	\$710.84 \$740.69	\$866.98 \$882.55	\$1,097.54 \$1,091.12	\$686.15 \$714.96	\$840.53 \$875.83	\$801.83 \$835.50	\$982.24 \$1,023.49	\$627.48 \$653.83	\$768.66 \$800.95	\$558.27 \$581.72	\$683.88 \$712.60	\$622.85 \$649.00	\$762.99 \$795.03	\$429.33 \$447.35	\$525.93 \$549.00	\$476.82 \$496.85	\$584.10 \$608.64	\$714.90 \$744.93	
48	5583.32	\$714.57		1,294.11	51,084.43	\$1,269.92	\$1,092.58	51,264.92	5817.32		5855.99	\$1,002.61	5792.35	\$970.63	\$790.07 \$784.62	5961.16	\$545.02 \$570.12	5698.40	\$550.96	5674.93	5632.50	5776.81	5923.20	51,190.92	5747.90	5916.18	5873.99	\$1,022.69	5683.95	5827.84	\$608.51	\$745.43	\$679.90	5831.65	5667.97	5573.26	5519.73	5636.67	5779.24	
49	\$608.65	\$745.60	\$1,153.07	1,412.51	\$1,131.52	\$1,386.11	\$1,077.42	\$1,319.84	\$852.81	\$1,044.70	\$893.56	\$1,094.12	\$826.76	\$1,012.78	\$818.69	\$1,002.90	\$594.88	\$729.73	\$574.89	\$704.24	\$659.97	\$908.46	\$963.29	\$1,180.03	\$790.38	\$955.96	\$911.94	\$1,117.13	\$713.65	\$874.22	\$634.94	\$777.80	\$708.38	\$867.77	\$488.29	\$598.16	\$542.30	\$664.32	\$813.08	\$ \$996.02
50 51	\$637.19 \$665.38	\$876.14 \$914.99		1,659.82	\$1,184.58 \$1,236.98	\$1,629.80 \$1,700.85	\$1,127.95 \$1,177.84	\$1,550.93	\$892.80 \$932.29	\$1,227.60 \$1,281.91	\$935.04 \$976.40	\$1,285.68 \$1,342.55	\$865.53	\$1,190.11 \$1,242.75	\$857.08 \$894.99	\$1,178.49 \$1,290.62	\$622.78 \$650.33	\$856.32 \$894.20	\$601.85 \$628.47	\$827.54 \$864.14	\$690.91 \$721.48	\$950.01 \$992.03	\$1,008.46 \$1,063.07	\$1,386.64 \$1,447.97	\$816.97 \$853.11	\$1,129.33 \$1,179.02	\$954.71 \$996.94	\$1,312.72 \$1,370.79	\$747.12 \$780.17	\$1,027.29 \$1,072.73	\$664.71 \$694.12	5913.98 5954.41		\$1,019.70 \$1,064.81	\$511.19 \$533.80	\$702.88 \$733.98	\$567.72 \$592.85	\$780.63 \$815.16	\$851.21 \$888.86	
51 52	5695.38 5696.42	\$914.89 \$957.57		1,722.24	\$1,236.98 \$1,294.68	\$1,700.85 \$1,780.19	\$1,177.84 \$1,232.79	\$1,619.53 \$1,695.08	\$932.29 \$975.79		\$976.40 \$1,021.95	\$1,342.55 \$1,405.18		\$1,242.75 \$1,300.72	\$894.99 \$936.75	\$1,290.62 \$1,288.02	\$650.33 \$680.66	5894.20 5935.91	\$628.47 \$657.28	\$864.14 \$904.45	\$721.48 \$755.13	\$992.03 \$1,038.31	\$1,053.07	\$1,647.97 \$1,515.52	5853.11 5892.90		\$1,043.44	\$1,370.79	\$790.17 \$816.56	\$1,072.72	\$694.12 \$726.50	5954.41 5998.93		\$1,064.81	\$533.80 \$558.70	\$733.98 \$768.21	\$592.85 \$620.50	\$815.16 \$853.19	5999.96 5990.32	
53	\$727.81	\$1,000.74	\$1,378.82	1,895.87	\$1,353.05	\$1,860.44	\$1,288.36	\$1,771.50	\$1,019.78	\$1,602.19	\$1,068.02	\$1,468.53	\$988.62	\$1,359.36	\$978.98	\$1,346.09	\$711.35	\$979.10	\$687.44	\$945.23	\$789.17	\$1,085.11	\$1,151.89	\$1,583.84	\$933.16	\$1,283.09	\$1,090.48	\$1,499.41	\$853.37	\$1,172.39	\$759.25	\$1,043.96	\$847.07	\$1,164.72	\$583.89	\$802.85	\$648.48	\$891.65	9972.26	
54	\$761.70 \$795.60	\$1,047.34		1,984.16	\$1,416.06	\$1,947.08	\$1,348.36 \$1,408.36	\$1,853.99	\$1,067.27	\$1,667.69 \$1,532.79	\$1,117.76	\$1,536.92 \$1,605.30	\$1,034.66	\$1,422.66 \$1.485.97	\$1,034.57 \$1,070.15	\$1,408.78 \$1,471.46	\$744.47	\$1,023.65	\$719.45 \$751.47	\$989.25	\$825.92 \$867.68	\$1,135.65	\$1,205.53 \$1,259.17	\$1,657.60	\$976.61 \$1,020.07	\$1,342.84 \$1.402.59	\$1,541.26	\$1,569.24	\$899.11 \$932.85	\$1,228.03	\$794.60 \$829.96	\$1,092.58		\$1,218.96	\$611.08 \$638.27	\$840.23 \$877.62	\$678.67 \$308.67	\$993.18 \$974.70	\$1,017.54	
56 66	\$795.60 \$832.34	\$1,093.95		2,072.45	\$1,479.07	\$2,033.72 \$2,127.66	\$1,408.36 \$1,473.41	\$1,936.49 \$2,025.93	\$1,114.75		\$1,167.49 \$1,221.42	\$1,605.30	\$1,080.70	\$1,485.97	\$1,030.15	\$1,671.46		\$1,069.20	\$751.47 \$786.17	\$1,093.26	\$862.68 \$902.52	\$1,186.18 \$1,240.97	\$1,259.17 \$1,317.33	\$1,731.36	\$1,020.07	\$1,467.38		\$1,639.06	\$932.85 \$975.94	\$1,292.67 \$1,341.92	\$829.96 \$868.30	\$1,141.20 \$1,193.91		\$1,279.20	9638.27 9667.75	\$877.62 \$918.16	\$708.87 \$741.61	\$974.70 \$1.019.72	\$1,062.82	
\$7	\$869.45	\$1,195.49	\$1,647.14	2,264.82	\$1,616.36	\$2,222.50	\$1,539.09	\$2,116.25	\$1,218.23	\$1,675.07	\$1,275.87	\$1,754.32	\$1,181.02	\$1,623.90	\$1,169.49	\$1,608.05	\$849.78	\$1,168.45	\$821.22	\$1,129.18	\$942.75	\$1,296.29	\$1,376.05	\$1,892.07	\$1,114.76	\$1,532.79	\$1,302.70	\$1,791.21	\$1,019.45	\$1,401.74	\$907.00	\$1,247.13	\$1,011.92	\$1,391.38	\$697.52	\$959.09	\$774.67	\$1,065.18	\$1,161.47	\$1,597.09
58	\$909.05	\$1,249.94			\$1,689.99	\$2,323.73	\$1,609.19	\$2,212.64	\$1,273.72		\$1,333.98	\$1,834.22	\$1,224.81	\$1,697.87	\$1,222.76	\$1,681.29		\$1,221.67	\$858.63	\$1,180.61	\$985.69	\$1,355.33	\$1,438.73	\$1,978.25	\$1,165.53		\$1,362.03	\$1,872.80	\$1,065.88	\$1,465.58				\$1,454.76	\$729.29	\$1,002.77		\$1,113.69		
59 60	\$928.67 \$969.27	\$1,276.92		2,419.09	\$1,726.47 \$1,800.09	\$2,373.89 \$2,475.12	\$1,643.92 \$1,714.03	\$2,260.40 \$2,356.79	\$1,301.21	\$1,789.17 \$1,865.46	\$1,362.77 \$1,420.89	\$1,973.92 \$1,953.72	\$1,261.47 \$1,315.26	\$1,734.52 \$1,908.48	\$1,249.15 \$1,302.42	\$1,717.59		\$1,248.04 \$1,301.26	\$877.16 \$914.56	\$1,206.09 \$1,257.53	\$1,006.97	\$1,284.58 \$1,442.62	\$1,469.78 \$1,532.46	\$2,020.95 \$2,107.13	\$1,190.69 \$1,241.47		\$1,391.43 \$1.450.77	\$1,913.22 \$1,994.81	\$1,088.89 \$1,135.32	\$1,497.22 \$1,561.07	\$968.78 \$1.010.10			\$1,486.16	\$745.03 \$776.80	\$1,034.42 \$1,068.10	\$827.44 \$867.73	\$1,137.72	\$1,240.59 \$1,293.49	
61	\$1,002.52	\$1,379.47		2,611.47	\$1,863.76	52,562,67	\$1,774.66	52,440.15	\$1,404.69	51,931.45	\$1,471.15	52,022,83	\$1,361.78	51,872.45	\$1,348.49	\$1,854.17	5979.85	\$1,347.29	5946.91	\$1,302.01	\$1,087.05	51,494.69	\$1,586,67	52,181,67	\$1,285.38		\$1,502.09	52,065.37	\$1,175.48	\$1,616.28	51,045.83			\$1,604.34	5804.28	\$1,105.88	5893.24	\$1,228.21	51,339.25	
62	\$1,025.00	\$1,409.38			\$1,905.55	\$2,620.13	\$1,814.44	\$2,494.86	\$1,436.18	\$1,974.75	\$1,504.13	\$2,068.18	\$1,392.31	\$1,914.43	\$1,378.72	\$1,895.75	\$1,001.82	\$1,377.50	\$968.54	\$1,331.20	\$1,111.42	\$1,528.20	\$1,622.34	\$2,230.58	\$1,314.20	\$1,807.02	\$1,535.76	\$2,111.67	\$1,201.83	\$1,652.52		\$1,470.25	\$1,192.96	\$1,640.31	\$822.31	\$1,130.68	\$913.27	\$1,255.75	\$1,369.27	51,882.75
ω	\$1,053.19		\$1,995.23 \$2,027.67	2,742.44	\$1,957.94	\$2,692.17	\$1,864.34	\$2,563.46	\$1,475.68	\$2,029.05	\$1,545.49	\$2,125.05	\$1,430.60	\$1,967.07	\$1,416.64	\$1,947.87	\$1,029.36	\$1,415.37		\$1,367.80 \$1,367.80	\$1,141.98	\$1,570.22	\$1,666.85			\$1,856.71 \$1,996.90	\$1,577.99	\$2,169.74	\$1,234.88	\$1,697.96	\$1,098.68	\$1,510.68	\$1,225.76	\$1,685.42	\$844.92 \$959.66	\$1,161.77	\$938.38 \$963.64	\$1,290.27		

IAC Insurance Company Small Group Plan Design Summary

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HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
44415PA0010001	Personal Choice EPO Silver HSA-0 \$3,000/80%	EPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020001	Personal Choice PPO Platinum Preferred \$10/\$20/\$150	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020002	Personal Choice PPO Platinum Preferred \$10/\$20/\$200	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020003	Personal Choice PPO Platinum Preferred \$20/\$40/\$250	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020004	Personal Choice PPO Gold Preferred \$40/\$80/\$600	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020005	Personal Choice PPO Gold Preferred \$40/\$80/\$500	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020006	Personal Choice PPO Gold Classic \$1,500/\$20/\$40/80%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020007	Personal Choice PPO Gold Classic \$2,500/\$40/\$80/90%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020008	Personal Choice PPO Silver Secure \$4,750/\$40/\$80/\$600	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020009	Personal Choice PPO Silver Classic \$5,000/\$50/\$100/90%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020010	Personal Choice PPO Silver Classic \$3,800/\$40/\$80/70%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020011	Personal Choice PPO Platinum HSA-50 \$1,800/100%	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020012	Personal Choice PPO Gold HSA-25 \$2,400/\$25/\$50/90%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020013	Personal Choice PPO Gold HSA-0 \$2,200/100%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020014	Personal Choice PPO Silver HSA-0 \$4,400/100%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020015	Personal Choice PPO Silver HSA-0 \$2,400/70%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020016	Personal Choice PPO Silver HSA-0 \$3,600/90%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020017	Personal Choice PPO Bronze HSA-0 \$5,600/50%	PPO	Bronze	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020018	Personal Choice PPO Bronze HSA-0 \$8,000/100%	PPO	Bronze	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020019	Personal Choice PPO Gold HRA-20 \$4,000/100%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
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Column C	Pediatric Dental (Yes/No) 1>	Ye	6	Yes		Ye	16	Ye	14	Ye				Ye		Ye	4	79	85	Ye	4	Ye	16	Yes	4	79	es.	Yes				Yes		Ye	4	Ye	4	Ye		Y	46
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6 5505 Mark 15075 (Mark 15075)	59		\$1,296.07	\$1,785.74 \$2			\$2,409.50		\$2,294.29						\$1,760.54	\$1,267.90	\$1,743.36			\$890.30			\$1,405.34	\$1,491.83								\$983.31	\$1,352.05	\$1,097.06	\$1,509.46		\$1,039.81				\$1,731.40
6 5505 Mark 15075 (Mark 15075)	60	5982.79											\$1,983.01																												
0 50007 RABS RAWS COMES SHARE	61			\$1,927.74 \$2			52 601 12		52.426.24						\$1,900.54	\$1,369.72	\$1,001.00			5961 10			\$1,517.10												\$1,679.47		\$1 122 50				\$1,000,00
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	60-	51,086.36	\$1,499.75	\$2,058,09 \$2	829.87	\$2,009.63	\$2,776.99	\$1,923.06	52,644.21	\$1,522.14	52,092,94	\$1,594.17	\$2,191.98	\$1,475.67	52,029,05	\$1,461.27	\$2,009.25	\$1,061.79	51,459,96	\$1,026.09	\$1,410.87	\$1,177.95	51,619,68	\$1,719.36	\$2,364.12	\$1,392.87	\$1,915.20	\$1,627.71	\$2,238.10	\$1,273.77	\$1,751.43	51.133.28	\$1,558.26	\$1,264.38	\$1,728.52	5871.56	\$1,198.40	\$967.95	\$1,330.93	51.451.25	

IAC Insurance Company Small Group Plan Design Summary

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HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
44415PA0010001	Personal Choice EPO Silver HSA-0 \$3,000/80%	EPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020001	Personal Choice PPO Platinum Preferred \$10/\$20/\$150	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020002	Personal Choice PPO Platinum Preferred \$10/\$20/\$200	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020003	Personal Choice PPO Platinum Preferred \$20/\$40/\$250	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020004	Personal Choice PPO Gold Preferred \$40/\$80/\$600	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020005	Personal Choice PPO Gold Preferred \$40/\$80/\$500	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020006	Personal Choice PPO Gold Classic \$1,500/\$20/\$40/80%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020007	Personal Choice PPO Gold Classic \$2,500/\$40/\$80/90%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020008	Personal Choice PPO Silver Secure \$4,750/\$40/\$80/\$600	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020009	Personal Choice PPO Silver Classic \$5,000/\$50/\$100/90%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020010	Personal Choice PPO Silver Classic \$3,800/\$40/\$80/70%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020011	Personal Choice PPO Platinum HSA-50 \$1,800/100%	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020012	Personal Choice PPO Gold HSA-25 \$2,400/\$25/\$50/90%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020013	Personal Choice PPO Gold HSA-0 \$2,200/100%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020014	Personal Choice PPO Silver HSA-0 \$4,400/100%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020015	Personal Choice PPO Silver HSA-0 \$2,400/70%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020016	Personal Choice PPO Silver HSA-0 \$3,600/90%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020017	Personal Choice PPO Bronze HSA-0 \$5,600/50%	PPO	Bronze	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020018	Personal Choice PPO Bronze HSA-0 \$8,000/100%	PPO	Bronze	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020019	Personal Choice PPO Gold HRA-20 \$4,000/100%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
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Figure 1: Single

	NOL Plan ID	SE SE 2020 Number of Co. Floridation Name	Protes	Reting County West	Ga/Gill Euchange	
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Company Name: Market: Product: Effective Date of Rates:	Small s	kroup O			finding date o	fRasec:	Decembe	er 31, 2025																																
HIOS Plan ID (On Exchange) 12																																								
HIOS Plan ID (Off Exchange) 12	44415PA		44415960			A0020002		M0020003	44415PA		44415PAI		44415986		44415980		44415960		44415980		44415PAG		44415980		44415PAG		444159400		44415PAG		44415900		44415PAD		444159400		4441526		4441598	
Plan Marketing Name 10 Form # 10																											Choice PPO Gold M-BC.SG.DFF.HS													
Rating Area 12						8		8																							1								1	
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OOP Maximum 19 Pediatric Dental (Yes/No) 19	59,1	100	\$3,0	00	- 59	,soo	- 54	,000	59.2	200	\$7,5	20	58,0	00	\$7,0	50	59,2		59,2	100	59,2	00	58,2	10	58,3	100	58,20	-	58,3	00	58,2		59,30	•	58,20	10	58,7	40	59,	100
Am Band	Non-Yebacca	Tehacea	Non-Tobacco	Toharra	Non-Tobacco	Tobacco	Non-Yohacra	Tobacco	Non-Tobacco	Toharm	Non-Toharro	Tobacco I	Non-Toharco	Tribacca	Man Toharro	Tobacco.	Non-Tohacoa	Yebacco	Non-Tobacco	Tobacca.	Nine-Yehacoa	Enhance	Non-Tobacco	Tohacen	Non-Yobacca	Yaharra	Man Toharro	Tohacco B	Von-Yobacco	Yaharra I	Son-Yoharro		Voe-Tobacco	Tobacco	Non-Tobacco	Yeharen	Non-Tribacca	Tobacco	Non-Yohacco	Tehacea
0 - 14	5281.18	5281.18	5532.68	5532.68	\$522.72	5522.72	5497.73	5497.73	5292.98	5293.98	\$412.61	\$412.61	5381.94	5281.94	5378.21	5279.21	5274.81	5274.81	\$265.58	5265.58	5304.88	5304.88	\$445.01	5645.01	\$360.51	5360.51	5421.29	542129	\$329.68	5329.68	5293.32	5293.32	\$327.25	5327.25	5225.58	\$225.58	\$250.53	\$250.53	5375.62	5375.62
15	\$906.17	\$306.17	\$580.03	\$580.03	\$569.19	\$569.19	\$541.97	\$541.97	\$429.00	\$429.00	\$449.29	\$449.29	\$415.89	\$415.89	\$411.83	\$411.83	\$299.24	\$299.24	\$289.18	\$289.18	\$331.98	\$331.98	\$484.56	\$484.56	\$392.56	\$392.56	\$458.73	\$458.73	\$358.00	\$358.99	\$319.60	\$319.40	\$356.34	\$356.34	\$245.63	\$245.63	\$272.80	\$272.80	\$609.01	\$409.01
16	\$215.72 \$225.28	\$315.72 \$325.28	\$598.14 \$616.24	\$598.14 \$616.24	\$586.95 \$604.72	\$586.95 \$604.72	\$558.89	\$558.89 \$575.81	\$442.39 \$455.78	\$442.39 \$455.78	\$463.31 \$477.33	\$463.31 \$477.33	\$428.87	\$428.87 \$441.05	\$434.68 \$437.54	\$424.68 \$437.54	\$308.58 \$317.92	\$308.58 \$317.92	\$298.21 \$307.24	\$298.21 \$307.24	\$342.35 \$352.71	\$342.35 \$352.71	\$499.69	\$499.69 \$514.91	\$404.81 \$417.07	\$404.81 \$417.07	\$473.05 \$487.37	\$473.05 \$487.37	\$370.19	\$370.19 \$391.40	\$329.37	\$229.37 \$239.34	\$367.46 \$379.59	\$367.46	\$253.29 \$260.96	\$253.29	\$281.31 \$289.83	\$281.31 \$289.83	\$421.78 \$434.54	\$421.78 \$434.54
17	\$325.28 \$335.57	\$325.28 \$335.57	\$616.24 \$635.74	\$616.24 \$635.74	\$604.72 \$623.85	\$604.72 \$623.85	\$575.81 \$594.03	\$575.81 \$594.03	\$455.78 \$470.20	\$455.78 \$420.20	\$477.33 \$492.44	\$477.33 \$492.44	\$441.85 \$455.83	\$641.85 \$455.93	\$437.54 \$451.30	\$437.54 \$451.38	\$317.92 \$327.99	\$317.92 \$337.98	\$307.24 \$316.96	\$307.24 \$316.96	\$352.71 \$363.97	\$352.71 \$363.87	\$\$14.81 \$\$31.00	\$514.81 \$531.10	\$417.07 \$430.76	\$417.07 \$430.26	\$487.37 \$603.70	\$497.37 \$500.79	\$381.40 \$363.47	\$391.40 \$392.47	\$339.34 \$350.02	\$339.34 \$350.07	\$379.59 \$390.56	\$279.59 \$390.56	\$260.96 \$269.22	\$260.96	\$289.83 \$289.00	\$289.83 \$299.00	\$434.54 \$449.70	\$434.54 \$449.70
19	\$345.86	\$345.86	\$655.24	\$655.24	\$642.99	\$642.99	\$612.24	\$612.24	\$484.62	\$484.62	\$507.54	\$507.54	\$469.81	\$469.81	\$465.22	\$465.22	\$338.04	\$338.04	\$326.68	\$326.68	\$375.03	\$375.03	\$547.39	\$547.39	\$443.46	\$443.46	\$518.21	\$518.21	\$405.53	\$405.53	\$360.81	\$360.81	\$402.54	\$402.54	\$277.47	\$277.47	\$309.17	\$309.17	\$462.04	\$462.04
20	\$356.52	\$356.52	\$675.43	\$675.43	\$662.80	\$662.80	\$631.11	\$631.11	\$499.55	\$499.55	\$523.18	\$523.18	\$484.29	\$484.29	\$479.56	\$479.56	\$348.45	\$348.45	\$236.75	\$226.75	\$386.58	\$386.58	\$564.26	\$564.26	\$457.12	\$457.12	\$534.18	\$534.18	\$418.03	\$418.03	\$371.93	\$371.93	\$414.95	\$414.95	\$286.02	\$286.02	\$317.67	\$317.67	\$476.28	\$476.28
21	\$967.55 \$967.55	\$413.49 \$413.49	\$696.32 \$696.32	\$783.36 \$783.36	\$683.30 \$683.30	\$768.71 \$768.71	\$650.63 \$650.63	\$731.96 \$731.96	\$515.00 \$515.00	\$579.38 \$579.39	\$539.36 \$539.36	\$606.78 \$606.78	\$499.27 \$499.27	\$561.68 \$561.68	\$494.29 \$494.29	\$556.19 \$556.19	\$359.22 \$359.22	\$404.13 \$404.13	\$347.56 \$347.56	\$390.56 \$390.56	\$398.54 \$398.54	\$448.36 \$448.36	\$581.71 \$581.71	\$654.42 \$654.43	\$471.26 \$471.26	\$530.17 \$530.17	\$\$\$0.70 \$\$\$0.70	\$619.54 \$619.54	\$430.96 \$430.96	\$484.82 \$484.82	\$282.42 \$282.43	\$431.36 \$431.36	\$427.78 \$427.78	\$481.25 \$481.25	\$294.87 \$294.87	\$331.73 \$331.73	\$327.49 \$337.49	\$368.43 \$368.43	\$491.01 \$491.01	\$552.39 \$552.39
22	\$867.55 \$867.55	5413.49	5696.32	5783.36	5683.30		965063	5731.96 5731.96	\$515.00	5579.28	5539.36	5606.78	5499.27	5561.68	5494.29	5556.19	5359.23	\$606.12 \$606.13	\$347.56 \$347.56	5390.56	5398.54	5448.36	5581.71	5654.42	\$471.26	\$530.17 \$530.17	\$550.70 \$550.70	5619.54	\$430.96	5484.82	5282.42	5431.36	\$427.78 \$427.78	5481.25	5294.87 5294.87	5331.73	\$327.69 \$327.69	5368.43	5491.01	5552.89
24	\$967.55	\$413.49	5696.32	5783.36	\$683.30	5768.71	\$650.63	5731.96	\$515.00	\$579.38	\$539.36	\$606.78	5499.27	\$561.68	5494.39	\$556.19	5359.23	5404.13	\$347.56	\$390.56	5398.54	5448.36	\$581.71	5654.42	\$471.26	\$530.17	\$550.70	5619.54	\$430.96	5484.83	5383.43	5431.36	\$427.78	5481.25	5294.87	5331.73	\$327.49	5368.43	5491.01	\$552.39
25	\$969.02	\$415.15	\$699.11	\$786.49	\$686.03		\$653.23	\$734.89	\$517.06	\$581.69	\$541.52	\$609.21	\$501.27	\$563.93	\$496.37	\$558.41	\$360.67	\$405.75	\$348.55	\$392.12	\$400.13	\$450.15	\$584.04	\$657.04	\$472.15	\$532.29	\$552.90	\$622.02	\$432.68	\$486.77	\$284.96	\$433.08	\$429.49	\$483.18	\$296.05	\$333.06	\$328.80	\$369.90	\$492.97	\$554.60
26	\$276.27 \$285.19	\$423.42 \$433.34	\$713.03 \$729.74	\$802.16 \$820.96	\$699.70 \$716.10	\$797.16 \$805.61	\$666.25 \$681.86	\$749.53 \$767.09	\$527.36 \$539.77	\$593.28 \$607.19	\$552.30 \$565.25	\$621.34 \$635.91	\$511.25 \$523.23	\$575.16 \$599.64	\$506.26 \$518.12	\$569.54 \$582.89	\$367.85 \$376.47	\$413.83 \$423.53	\$355.49 \$363.82	\$399.93 \$409.30	\$409.10 \$417.67	\$459.12 \$469.88	\$595.67 \$609.63	\$670.13 \$685.84	\$492.57 \$499.88	\$542.89 \$555.62	\$563.92 \$577.13	\$634.41 \$649.28	\$441.30 \$451.65	\$496.47 \$509.10	\$392.63 \$401.83	\$441.71 \$452.06	\$438.05 \$448.31	\$492.80 \$504.35	\$301.95 \$309.02	\$339.69 \$347.65	\$335.35 \$343.21	\$377.27 \$386.11	\$502.79 \$514.58	\$565.64 \$578.90
27	5299.53	SA49.47	\$729.74	5851.51	\$716.50 \$742.75	5835.59	5707.23	\$795.64	5559.81	5607.19 5629.78	5586.28	\$659.57	\$542.71	5510.54	5537.40	5604.58	5390.49	5429.29	5377.36	5404.00 5434.53	5433.21	5487.36	5632.32	5711.36	\$512.26	5576.29	5577.13	5673.44	5468.45	\$509.10 \$527.01	5416.79	5468.89	\$465.00	\$523.12	\$200.02 \$220.52	5367.65	2300.00	5400.49	5522.72	5578.90 5600.44
29	\$411.29	\$462.70	\$779.18	\$876.58	\$764.61	\$860.19	\$728.05	\$819.06	\$576.29	\$648.32	\$609.54	\$679.99	\$558.68	\$628.52	\$553.22	\$622.38	\$401.98	\$452.23	\$388.47	\$437.03	\$445.97	\$501.71	\$650.93	\$732.30	\$527.34	\$599.26	\$616.23	\$693.26	\$492.24	\$542.52	\$429.06	\$482.69	\$479.69	\$538.52	\$329.96	\$371.20	\$366.46	\$412.27	\$549.44	\$618.12
30	\$417.17	\$490.17	\$790.32	\$928.63	\$775.55	\$911.27	\$738.47	\$867.70	\$584.53	\$696.92	\$612.17	\$719.30	\$566.67	\$665.84	\$561.13	\$659.33	\$407.72	\$479.08	\$394.03	\$462.98	\$452.34	\$531.50	\$660.24	\$775.78	\$534.88	\$628.48	\$625.04	\$734.43	\$489.14	\$574.74	\$435.19	\$511.35	\$485.53	\$570.50	\$334.68	\$393.25	\$371.70	\$436.75	\$557.30	\$654.82
31	\$425.99 \$434.81	\$500.54 \$510.00	\$807.03 \$823.75	\$948.27 \$967.90	\$791.94 \$808.34	\$930.54 \$949.80	\$754.08 \$769.70	\$886.04 5904.39	\$596.89 \$609.25	\$701.34 \$715.96	\$625.12 \$638.06	\$794.51 \$769.72	\$578.65 \$590.64	\$679.92 \$694.00	\$\$73.00 \$\$84.86	\$673.27 \$687.21	\$416.35 \$424.97	\$499.21 \$499.34	\$402.36 \$410.69	\$472.77 \$482.56	\$461.91 \$471.47	\$542.74 \$553.98	\$674.20 \$688.16	\$792.19 Sana Sa	\$546.19 \$557.50	\$641.77 \$655.06	\$638.26 \$651.48	\$749.96 \$765.49	\$499.48 \$509.83	\$586.89 \$589.05	\$464.60 \$453.60	\$522.16 \$532.98	\$495.80 \$506.06	\$582.56 \$584.67	\$341.75 \$349.93	\$405.56 \$409.88	\$379.56 \$387.42	\$445.98 \$455.22	\$569.08 \$580.86	\$668.67 \$682.53
22	5440.32	\$517.38	5834.19	5990.17	5818.59	5961.85	\$779.45	5915.86	\$616.97	5724.94	\$646.15	5759.22	5598.13	\$702.80	5592.28	\$695.93	\$430.36	\$505.67	\$415.90	5488.68	\$477.45	\$561.00	5696.89	5818.84	\$564.57	5663.37	\$659.74	\$775.19	\$516.29	5606.64	\$459.35	5529.74	\$512.48	5602.16	5353.25	\$415.07	5392.33	5460.99	5588.23	5691.17
34	\$446.21	\$524.29	\$845.33	\$993.27	\$829.53		\$789.86	\$928.09	\$625.21	\$734.62	\$654.28	\$769.37	\$606.11	\$712.18	\$600.19	\$705.22	\$436.11	\$512.42	\$421.45	\$495.21	\$483.83	\$568.50	\$706.20	\$829.78	\$572.11	\$672.23	\$668.55	\$785.55	\$523.19	\$614.74	\$465.48	\$546.94	\$519.32	\$610.21	\$357.97	\$420.62	\$397.57	\$467.15	\$596.09	\$700.40
35	\$649.15	\$527.75	\$850.90	\$999.81	\$834.99		\$795.07	\$934.21	\$629.33	\$739.46	\$659.50	\$774.44	\$610.11	\$716.88	\$604.54	\$709.87	\$438.98	\$515.80	\$424.23	\$498.47	\$487.02	\$572.24	\$710.85	\$835.25	\$575.88	\$676.66	\$672.96	\$790.72	\$526.63	\$618.79	\$468.55	\$550.55	\$522.75	\$614.22	\$960.33	\$423.39	\$400.19	\$470.22	\$600.01	\$705.02
36	\$452.09 \$455.03	\$531.20 \$534.66	\$856.47 \$862.04	\$1,006.36	\$840.46 \$845.93	\$997.54 \$993.96	\$800.27 \$805.48	\$940.32 \$946.44	\$633.45 \$637.57	\$744.30 \$749.14	\$663.41 \$667.73	\$779.S1 \$784.SR	\$614.10 \$618.10	\$721.57 \$726.26	\$608.00 \$612.05	\$714.52 \$719.16	\$441.85 \$444.72	\$519.18 \$522.55	\$427.01 \$429.78	\$501.73 \$505.00	\$490.20 \$493.39	\$575.99 \$579.74	\$715.50 \$720.16	\$840.72 \$846.19	\$579.65 \$583.42	\$681.09 \$685.52	\$677.36 \$681.77	\$795.90 \$801.00	\$530.08 \$533.53	\$622.84 \$626.90	\$471.62 \$474.69	\$554.15 \$557.76	\$526.17 \$529.59	\$618.25 \$632.37	\$362.69 \$365.05	\$426.56 \$428.93	\$402.81 \$405.43	\$479.30 \$476.38	\$603.94 \$607.87	\$709.63 \$714.25
28	\$457.97	\$538.11	5967.61	\$1,012.45	5851.39	\$1,000.39	5810.68	5952.55	\$641.69	\$753.99	\$672.04	5789.65	5622.09	\$730.96	\$616.01	5723.81	\$447.60	\$525.93	\$432.56	5508.26	5496.58	5583.48	5724.81	5851.65	5587.19	5689.95	5686.17	5806.25	\$536.98	5630.95	\$477.75	5561.36	\$533.01	5626.29	5967.41	5431.70	\$409.05	5479.46	\$611.80	5718.86
29	\$463.85	\$545.02	\$828.76	\$1,032.54	\$862.32	\$1,013.23	\$821.10	\$964.79	\$649.93	\$763.67	\$680.67	\$799.79	\$630.08	\$740.34	\$623.92	\$723.11	\$453.35	\$532.68	\$438.12	\$514.79	\$502.96	\$590.98	\$794.12	\$862.59	\$594.72	\$698.81	\$694.98	\$816.61	\$543.87	\$639.05	5483.89	\$568.57	\$539.86	\$624.22	\$372.13	\$437.25	\$413.29	\$485.62	\$619.65	\$728.09
40	\$469.73 \$478.55	\$575.42 \$586.22	\$889.90 \$906.61	\$1,090.12	\$873.26 \$889.66	\$1,069.74 \$1,089.83	\$831.51 \$847.12	\$1,018.59 \$1,037.72	\$658.17 \$670.53	\$806.26 \$821.40	\$689.30 \$702.25	\$844.40 \$860.25	\$638.07 \$650.05	\$781.63 \$796.31	\$631.83 \$643.70	\$773.99 \$788.53	\$459.10 \$467.72	\$562.39 \$572.95	\$443.67 \$452.00	\$543.50 \$553.70	\$509.33 \$518.90	\$622.92 \$635.65	\$743.43 \$757.39	\$910.70 \$927.80	\$602.27 \$613.58	\$737.78 \$751.64	\$703.79 \$717.01	5862.15 5878.34	\$550.77 \$561.11	\$674.69 \$697.36	\$490.02 \$499.23	\$600.28 \$611.55	\$546.70 \$556.97	\$669.71 \$682.29	\$276.84 \$283.92	\$461.63 \$470.30	\$418.53 \$426.39	\$512.70 \$522.33	\$627.51 \$639.30	\$768.70 \$782.54
41	\$478.55 \$487.00	\$586.22 \$596.58	\$906.61 \$922.62	\$1,110.60	\$889.66 \$905.37	\$1,089.83 \$1,109.08	\$847.12 \$862.08	\$1,037.72	\$670.53 \$682.38	\$821.60 \$835.91	\$714.65	\$860.35 \$875.45	\$650.05 \$661.53	\$796.31 \$810.38	\$643.70 \$655.07	\$788.53 \$802.46	\$467.72 \$475.98	\$572.95 \$583.08	\$452.00 \$459.99	\$553.70 \$563.48	\$518.90 \$528.07	\$635.65 \$646.88	\$757.39 \$770.77	\$927.80 \$944.19	\$613.58 \$624.42	\$751.64 \$764.91	\$717.01 \$729.68	5878.34 5893.85	\$561.11 \$571.02	\$687.36 \$699.50	\$499.23 \$508.04	\$611.55 \$622.35	\$556.81 \$566.81	\$692.29 \$694.34	\$293.92 \$290.70	\$470.30 \$478.61	\$426.39 \$433.92	\$522.33 \$531.56	\$639.30 \$650.59	\$783.54 \$796.97
43	\$498.77	\$610.99	\$964.91	\$1,157.51	\$927.24	\$1,135.87	5882.90	\$1,081.56	\$698.86	\$856.10	\$731.91	\$896.59	\$677.51	\$829.95	\$670.89	\$821.84	\$487.48	\$597.16	\$471.00	\$577.09	\$540.82	\$662.50	\$789.38	\$966.99	\$639.50	\$783.39	\$747.30	\$915.44	\$584.81	\$716.40	\$\$20.31	\$637.39	\$580.50	\$711.11	\$400.14	\$490.17	\$444.40	\$544.39	\$666.30	\$816.22
44	\$513.47	\$629.00	\$972.76	\$1,191.63	\$954.57	\$1,169.35	\$908.93		\$719.46	\$881.33	\$753.49	\$923.02	\$697.48	\$854.41	\$690.66	\$846.06	\$501.84	\$614.76	\$484.98	\$594.10	\$556.76	\$692.03	\$812.65	\$995.49	\$658.35	\$806.48	\$369.33	\$942.43	\$602.06	\$727.51	\$535.65	\$656.17	\$597.61	\$792.07	\$411.93	\$504.62	\$457.50	\$560.44	\$685.94	\$840.28
45	\$530.74 \$551.33	\$650.16 \$675.37	\$1,005.49	\$1,231.72 \$1,279.49	\$986.69 \$1,024.95	\$1,208.69	\$929.51 \$975.95	\$1,150.90	\$743.66 \$772.50	\$910.98 \$946.31	\$778.84 \$809.04	\$954.07 \$991.07	\$720.95 \$748.91	\$883.16 \$917.41	\$713.90 \$741.59	\$874.53 \$908.44	\$518.72 \$538.85	\$635.44 \$660.09	\$501.30 \$520.74	\$614.09 \$637.91	\$575.49 \$597.81	\$704.98 \$732.32		\$1,028.99	\$680.50 \$706.89	\$833.61 \$865.94	\$795.21 \$826.05	\$974.13 \$1,011.91	\$622.31 \$646.44	\$762.33 \$791.89	\$553.67 \$575.15	\$678.25 \$704.55	\$617.71 \$641.67	\$756.70 \$786.05	\$425.79 \$442.31	\$521.60 \$541.82	\$472.90 \$491.24	\$579.30 \$601.76	\$709.02 \$736.52	5868.55 5902.23
42	5574.48	\$703.74	51,088.35	\$1,279.69	\$1,038.95	\$1,255.56	\$1,016.93	51,245.74	\$772.50 \$804.85	5986.06	5843.02	\$1,092.70	5780.36	5955.94	\$772.73	5946.60	554148 556148	\$687.81	\$542.61	\$664.70	5622.92	\$763.07		51,113.79	5726.58	5902.31		\$1,011.91 \$1,054.41	\$673.59	\$791.89 \$825.15	\$599.30	\$734.14	5668.62	5819.06	5460.88	5541.92 5564.58	5691.36 5511.87	\$627.04	\$786.52 \$767.45	5942.12
48	\$600.94	\$736.16	\$1,138.48	\$1,394.64	\$1,117.20	\$1,368.56	\$1,063.78	\$1,303.13	\$842.03	\$1,031.48	5881.85	\$1,090.27	\$816.31	5999.98	\$808.33	\$990.20	\$587.34	\$719.49	\$567.61	\$695.32	\$651.61	\$798.23	\$951.10	\$1,165.09	\$770.51	\$943.87	\$900.29	\$1,102.98	\$704.62	\$863.16	\$626.91	\$767.96	\$699.42	\$856.79	\$482.11	\$590.59	\$535.45	\$655.92	\$802.80	5983.43
49	\$627.04 \$656.44	\$768.12	\$1,187.92 \$1,243.63	\$1,455.20	\$1,165.71 \$1,220.37	\$1,427.99	\$1,109.97 \$1,162.03	\$1,359.72 \$1,597.78	\$878.59 \$919.79	\$1,076.27 \$1,264.71	\$920.15 \$963.30	\$1,127.18 \$1,324.53	\$851.75	\$1,043.40 \$1,226.08	\$843.43 \$882.98	\$1,033.20	\$612.85 \$641.50	\$750.74 \$882.18	\$592.25 \$620.03	\$725.51 \$852.54	\$679.91 \$711.79	\$832.89 \$978.71		\$1,215.69	\$809.97 \$841.67	\$984.86 \$1.157.30		\$1,150.88 \$1,352.38	\$735.22 \$769.69	\$900.64 \$1,058.33	\$654.13 \$684.81	\$801.31 \$941.61	\$729.79 \$764.02	\$894.00	\$503.05 \$526.64	\$616.23 \$726.13	\$558.70 \$584.90	\$684.40 \$804.23	\$837.66 \$876.94	\$1,036.14 \$1,205.80
50 51	5656.44 5695.49	\$902.61 \$942.54	\$1,243.63 \$1,298.64	\$1,709.99	\$1,220.37 \$1,274.35	\$1,679.01	\$1,162.03 \$1,213.42	\$1,597.78	\$919.79 \$960.48	\$1,264.71 \$1,320.65	\$963.30 \$1,005.91	\$1,324.53 \$1,383.12	\$891.70 \$991.14	\$1,226.08 \$1,280.32	5882.98 5922.04	\$1,214.10 \$1,267.80	\$641.58 \$669.96	\$882.18 \$921.20	\$620.00 \$647.45	\$852.54 \$890.25	\$711.79 \$743.28	\$979.71 \$1,022.01		\$1,428.53 \$1,491.72	5841.67 5879.90	\$1,157.30		\$1,352.38 \$1,412.20		\$1,058.33 \$1,105.14	\$684.81 \$715.10	5941.61 5983.26		\$1,050.52	\$526.64 \$549.93	\$734.13 \$756.16	\$584.90 \$610.77	\$804.23 \$839.81	9876.94 9915.73	\$1,205.80 \$1,259.13
52	\$717.46	\$996.50	\$1,359.22	\$1,868.92	\$1,333.80	\$1,833.98	\$1,270.03	\$1,746.29	\$1,005.28	\$1,382.26	\$1,052.83	\$1,647.64	\$974.58	\$1,340.04	\$965.05	\$1,326.94	\$701.22	\$964.17	\$677.66	\$991.78	\$777.95	\$1,069.68	\$1,135.50	\$1,561.31	\$919.90	\$1,264.86	\$1,074.97	\$1,478.08	\$841.23	\$1,156.70	\$748.46	\$1,029.13	\$835.03	\$1,148.16	\$575.59	\$791.43	\$639.26	\$879.98	\$958.45	\$1,317.87
53	\$749.90	\$1,030.98	\$1,420.49	\$1,953.18	\$1,293.93	\$1,916.66	\$1,327.29	\$1,825.02	\$1,050.60	\$1,444.58	\$1,100.29	\$1,512.90	\$1,018.51	\$1,400.45	\$1,008.56	\$1,386.76	\$792.83	\$1,007.64	\$708.21	\$973.78	\$813.02	\$1,117.90	\$1,186.69	\$1,631.70	\$961.37	\$1,321.88		\$1,544.71		\$1,209.84	\$282.20	\$1,075.52		\$1,199.92	\$601.53	\$827.11	\$668.08	\$918.61	\$1,001.66	\$1,377.28
54	\$784.72 \$919.64	\$1,079.99	\$1,486.64 \$1,552.79	\$2,044.13	\$1,458.85 \$1,523.76	\$2,005.91 \$2,095.17	\$1,289.10 \$1,450.90	\$1,910.01	\$1,099.53 \$1,148.45	\$1,511.85 \$1,579.12	\$1,151.53	\$1,583.36	\$1,065.94	\$1,465.67	\$1,055.52 \$1,102.49	\$1,451.34 \$1,515.92	\$766.96 5901.09	\$1,054.56	\$741.19 \$774.17	\$1,019.13 \$1,064.48	\$850.88 \$860.74	\$1,169.96 \$1,222.02		\$1,707.68	\$1,006.14	\$1,383.44 \$1,445.00		\$1,616.65 \$1,688.58		\$1,265.14 \$1,321.43	\$818.62 \$855.05	\$1,125.61		\$1,255.80 \$1,311.68	\$629.55 \$657.56	\$865.63 \$904.15	\$699.19 \$730.30	\$961.39 \$1.004.17	\$1,048.31 \$1,094.95	\$1,441.42 \$1,505.56
56	5857.49	\$1,179.05	\$1,624.51	52,135,09	\$1,524.76	\$2,095.17 \$2,191.94	\$1,450.90	52,097,14	\$1,301.50	\$1,579.12 \$1,652.06	\$1,258.33	\$1,730.20	\$1,118.87	\$1,530.89	\$1,153.41	\$1,585.94		\$1,101.49	5909.92	51,064.48	5929.79	51,222.02	\$1,297.21	\$1,866.05	\$1,090.91	\$1,645.00				\$1,821.48	5894.54	\$1,275.69		\$1,272.26	5687.93	5945.91	5764.03	\$1,050.55	\$1,094.95	\$1,505.56
57	\$895.72	\$1,231.61	\$1,696.93	\$2,333.28	\$1,665.20	\$2,289.65	\$1,585.59	\$2,180.18	\$1,255.06	\$1,725.70	\$1,314.42	\$1,807.33	\$1,216.72	\$1,672.99	\$1,204.83	\$1,656.64	\$875.44	\$1,203.73	\$846.03	\$1,163.29	\$971.24	\$1,335.46	\$1,417.63	\$1,949.24	\$1,148.46	\$1,579.13	\$1,342.06	\$1,845.33	\$1,050.25	\$1,444.09	\$994.42	\$1,284.83	\$1,042.50	\$1,433.44	\$718.60	\$988.07	\$798.09	\$1,097.38	\$1,196.59	\$1,645.31
58	9936.52 9956.73	\$1,297.71 \$1,315.51	\$1,774.22	\$2,439.56	\$1,741.05 \$1,778.69	\$2,293.94 \$2,445.62	\$1,657.81	\$2,279.48 \$2,279.69	\$1,312.22 \$1.340.55	\$1,804.30 \$1,843.25	\$1,374.29 \$1,400.05	\$1,889.65 \$1,930.44	\$1,272.14 \$1,299.60	\$1,749.19	\$1,259.71 \$1,286.90	\$1,792.10 \$1,769.48	\$915.32 \$935.00	\$1,258.56	\$884.56 \$903.66	\$1,216.28 \$1,242.53	\$1,015.48	\$1,396.28 \$1,426.42	\$1,482.20 \$1,514.19	\$2,038.02	\$1,200.77 \$1,226.69	\$1,651.06 \$1,686.70				\$1,509.87 \$1,542.46	\$976.98 \$999.07	\$1,343.35 \$1,372.34	\$1,089.98	\$1,499.73		\$1,033.08 \$1,055.38	\$834.44 \$857.46	\$1,147.36	\$1,251.09 \$1,278.10	\$1,720.25 \$1,757.39
59	9956.73	\$1,315.51	\$1,812.52	\$2,492.22 \$2,599.49	\$1,778.63 \$1,854.48	\$2,645.62 \$2,549.90		\$2,329.69 \$2,427.99	\$1,340.55 \$1,397.71	\$1,843.25 \$1,921.85	\$1,403.95 \$1,463.82		\$1,299.60	\$1,786.95 \$1,863.15	\$1,286.90	\$1,769.48 \$1 944.94	\$935.08 \$974.95		\$903.66 \$942.19	\$1,242.53 \$1,295.51	\$1,097.40 \$1,091.64	\$1,426.42 \$1,487.25	\$1,514.19	\$2,082.01	\$1,226.69	\$1,686.70			\$1,121.79		\$998.07	\$1,372.34 \$1,430.86	\$1,113.51			\$1,055.38	\$852.46 \$889.91	\$1,172.13 \$1,222.11	\$1,278.10	\$1,757.39 \$1,832.33
61	51,032,82	\$1,420.12	\$1,956.66	52,690.41	\$1,920.07	52,640.10	\$1,828.27	52,513.87	\$1,447.15	51,989.83	\$1,515.60		\$1,402.95	51,929.05	\$1,389.24	\$1,910.20	\$1,009.44	\$1,397.97	5975.52	\$1,341.34	\$1,119.90	51,539.86	\$1,694,61	52,247.58	\$1,324.24	\$1,820.83			\$1,711.00		\$1,077.44			\$1,652.83		\$1,139.30	5920.25	\$1,265.34	\$1,379.74	\$1,897.14
62	\$1,055.97	\$1,451.96	\$2,000.53	\$2,750.72	\$1,963.12	\$2,699.29			\$1,479.60	\$2,034.44	\$1,549.58	\$2,130.67	\$1,434.40			\$1,953.03	\$1,032.07	\$1,419.09		\$1,371.41	\$1,145.01	\$1,574.38	\$1,671.25	\$2,297.97		\$1,861.65	\$1,582.16	\$2,175.47	\$1,238.15	\$1,702.45		\$1,514.69	\$1,229.01	\$1,689.89	\$847.16	\$1,164.85	\$940.88	\$1,293.71	\$1,410.67	\$1,939.67
63	\$1,085.01	\$1,491.89	\$2,055.54	\$2,826.36	\$2,017.50 \$2,049.90	\$2,772.51	\$1,920.66 \$1,951.89	\$2,640.91	\$1,520.28 \$1,545.00	\$2,090.29 \$2,124.38	\$1,592.19	\$2,189.36 \$2,224.86	\$1,472.85	\$2,026.54	\$1,459.44 \$1,483.17	\$2,006.73 \$2,039.36	\$1,060.45 \$1,077.69	\$1,458.11	\$1,024.82 \$1,041.48	\$1,409.12 \$1,432.04	\$1,176.49 \$1,195.62	\$1,617.67	\$1,717.21 \$1,765.13	\$2,361.16	\$1,391.16	\$1,912.84 \$1,943.95	\$1,625.67 \$1,652.10	52,235.29	\$1,272.19	\$1,749.27	\$1,131.89	\$1,556.34	\$1,262.81 \$1,283.34	\$1,726.26		\$1,196.88	\$966.75 \$983.47	\$1,329.28		\$1,993.01
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IAC Insurance Company Small Group Plan Design Summary

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HIOS Plan ID	Plan Marketing Name	Product	Metal	Exchange	Network	Rating Area	Counties Covered
44415PA0010001	Personal Choice EPO Silver HSA-0 \$3,000/80%	EPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020001	Personal Choice PPO Platinum Preferred \$10/\$20/\$150	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020002	Personal Choice PPO Platinum Preferred \$10/\$20/\$200	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020003	Personal Choice PPO Platinum Preferred \$20/\$40/\$250	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020004	Personal Choice PPO Gold Preferred \$40/\$80/\$600	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020005	Personal Choice PPO Gold Preferred \$40/\$80/\$500	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020006	Personal Choice PPO Gold Classic \$1,500/\$20/\$40/80%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020007	Personal Choice PPO Gold Classic \$2,500/\$40/\$80/90%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020008	Personal Choice PPO Silver Secure \$4,750/\$40/\$80/\$600	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020009	Personal Choice PPO Silver Classic \$5,000/\$50/\$100/90%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020010	Personal Choice PPO Silver Classic \$3,800/\$40/\$80/70%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020011	Personal Choice PPO Platinum HSA-50 \$1.800/100%	PPO	Platinum	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020012	Personal Choice PPO Gold HSA-25 \$2,400/\$25/\$50/90%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020013	Personal Choice PPO Gold HSA-0 \$2,200/100%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020014	Personal Choice PPO Silver HSA-0 \$4,400/100%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020015	Personal Choice PPO Silver HSA-0 \$2,400/70%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020016	Personal Choice PPO Silver HSA-0 \$3,600/90%	PPO	Silver	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020017	Personal Choice PPO Bronze HSA-0 \$5,600/50%	PPO	Bronze	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020018	Personal Choice PPO Bronze HSA-0 \$8,000/100%	PPO	Bronze	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
44415PA0020019	Personal Choice PPO Gold HRA-20 \$4,000/100%	PPO	Gold	Off	Personal Choice	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
444131 70020013	1 C13011a1 C1101CC 1 1 O G01d 11104 20 \$4,000/100/0	110	Gold	011	r crsonar enoice		bacis, enester, belaviare, montgomery, rimadelpina
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				\$983.50 \$983.50 \$983.50 \$988.30 \$988.30 \$988.30 \$988.30 \$998.3
### (1997) American Serial Ser				9613 DH33 DH33 DH33 SAN39 SAN3
METAPORE				\$613.0 \$6
Management Man				

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Unified Rate Review v6.0												To a	dd a product to	o Worksheet 2	2 - Plan F	roduct Info, s	elect the Add F	Product butto	ton c
												To a	dd a plan to W	orksheet 2 - F	Plan Proc	uct Info, selec	t the Add Plan	ı button or C	Ctrl -
Company Legal Name:	Independence Assurance Con	npany										To vo	alidate, select t	the Validate b	outton or	Ctrl + Shift +			
HIOS Issuer ID:	44415	State:	PA									To fi	nalize, select tl	he Finalize but	tton or C	trl + Shift + F.			
Effective Date of Rate Change(s):	1/1/2025	Market:	Small Group)															
Market Level Calculations (Same for	all Plans)																		
Section I: Experience Period Data Experience Period:		1	/1/2023	to	12/31/2023														
Experience Period.		1/	/1/2023	Total	PMPM PMPM														
Allowed Claims				\$0.00		#DIV/0!													
Reinsurance				\$0.00		#DIV/0!													
Incurred Claims in Experience Period				\$0.00		#DIV/0!													
Risk Adjustment				\$0.00	#	#DIV/0!													
Experience Period Premium				\$0.00	#	#DIV/0!													
Experience Period Member Months				0															
Section II: Projections																			
Section II. Projections	1	Т	Year 1 Trend	I		Year 2 Tre	end		ı										
	Experience Period Index	ı	1					Trended EHB Allowed Claims											
Benefit Category	Rate PMPM	Cost		Utilization	Cost		Utilization	PMPM											
Inpatient Hospital	\$0.0		1.056	1.043		1.056	1.043	\$0.00	l										
Outpatient Hospital	\$0.0		1.048	1.043		1.048	1.043	\$0.00	l										
Professional	\$0.0	00	1.029	1.043		1.029	1.043	\$0.00											
Other Medical	\$0.0		1.029	1.043		1.029	1.043	\$0.00	l										
Capitation Prescription Drug	\$0.0 \$0.0		1.000 0.995	1.035 1.043		1.000 0.995	1.035 1.043	\$0.00 \$0.00	l										
Total	\$0.0		0.995	1.043		0.995	1.043	\$0.00	ł										
Total	Ş0.0	<u> </u>					I	φοισο	ı										
Morbidity Adjustment						1.000													
Demographic Shift						0.997													
Plan Design Changes						1.000													
Other						0.000													
Adjusted Trended EHB Allowed Clain	ns PMPM for	1	/1/2025			\$0.00													
Manual FUR Allamed Claim 21121						8800.63													
Manual EHB Allowed Claims PMPM Applied Credibility %						0.00%													
Abuse creationity to						0.0070													
							Projected Period Totals												
Projected Index Rate for		1	/1/2025		\$1	800.63	\$743,452,207.92												
Reinsurance						\$0.00	\$0.00												
Risk Adjustment Payment/Charge						\$24.67	\$22,908,167.28												
Exchange User Fees						0.00%	<u>\$0.00</u>												
Market Adjusted Index Rate					\$	775.96	\$720,544,040.64												
Drainstad Mambar Months					0.	28,584													
Projected Member Months					9.	128,584													
Information Not Releasable to the I	Dublic Unless Authorized by L	auu This information has not	boon publically disc	locad and may be priviled	ad and confidential. It is for i	internal go	wornment use only and must not	an discominated distributed or	oniod to	o norconc	not authoris	riand to ro	noise the infer	mation Unau	thorizon	disclosuro m	ov rocult in or	ococution	
illiorniation Not Releasable to the i	rubiic Offiess Authorized by L	aw. This information has not	been publically disc	oseu anu may be privileg			ent of the law.	Je uissemmateu, distributed, or i	opied to	o persons	not authoriz	izeu to re	Leive tile inion	mation. Unat	atriorized	uisciosure mi	y result in pro	secution	
					to ti	run exte	THE OF SHE IOW.												

Product-Plan Data Collection

Company Legal Name:

HIOS Issuer ID: Effective Date of Rate Change(s): State: Market: 44415 1/1/2025

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

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

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

To finalize, seed the Finalize button or Cris -54(t + 1).

To finalize, seed the Finalize button or Cris -54(t + 1).

To finalize, seed the Finalize button or Cris -54(t + 1).

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To remove a plan recognize to the corresponding Pain Manuf/Pain to Jeld and select the Remove Pain button or Cris -54(t + 0.)

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F	ield # Section I: General Product and Plan Information																					
	1.1 Product Name	Perso	nal Choice EPO Small									Person	al Choice PPO Smal	l Group								
	1.2 Product ID		44415PA001										44415PA002									
	1.3 Plan Name		EPO Silver HSA-0	PPO Platinum	PPO Platinum	PPO Platinum	PPO Gold	PPO Gold	PPO Gold Classic	PPO Gold Classic	PPO Silver Secure	PPO Silver Classic	PPO Silver Classic	PPO Platinum HSA-	PPO Gold HSA-25	PPO Gold HSA-0	PPO Silver HSA-0	PPO Silver HSA-0	PPO Silver HSA-0	PPO Bronze HSA-0	PPO Bronze HSA-0	PPO Gold HRA-20
	1.4 Plan ID (Standard Component ID)		44415PA0010001	44415PA0020001	44415PA0020002	44415PA0020003	44415PA0020004	44415PA0020005	44415PA0020006	44415PA0020007	44415PA0020008	44415PA0020009	44415PA0020010	44415PA0020011	44415PA0020012	44415PA0020013	44415PA0020014	44415PA0020015	44415PA0020016	44415PA0020017	44415PA0020018	44415PA0020019
	1.5 Metal		Silver	Platinum	Platinum	Platinum	Gold	Gold	Gold	Gold	Silver	Silver	Silver	Platinum	Gold	Gold	Silver	Silver	Silver	Bronze	Bronze	Gold
	1.6 AV Metal Value		0.706	0.916	0.909	0.887	0.781	0.799	0.790	0.805	0.710	0.701	0.711	0.912	0.807	0.811	0.705	0.708	0.706	0.624	0.614	0.816
	1.7 Plan Category		Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing	Renewing
	1.8 Plan Type		EPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO
	1.9 Exchange Plan?		No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No
	1.10 Effective Date of Proposed Rates		1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025
	1.11 Cumulative Rate Change % (over 12 mos prior)		5.74%	7.64%	7.30%	7.31%	7.64%	7.73%	6.82%	6.90%	6.75%	6.95%	7.13%	7.40%	6.25%	6.98%	7.04%	5.55%	5.80%	6.71%	6.76%	7.16%

1.10 Effective Date of Proposed Rates
1.11 Cumulative Rate Change % (over 12 mos prior)
1.12 Product Rate Increase % 5.74% #DIV/0!

	1.13 Submission Level Rate Increase %											#D	IV/0!									
Worksheet 1 Totals	Section II: Experience Period and Current Plan Level	Information																				
	2.1 Plan ID (Standard Component ID)	Total	44415PA0010001	44415PA0020001	44415PA0020002	44415PA0020003	44415PA0020004	44415PA0020005	44415PA0020006	44415PA0020007	44415PA0020008	44415PA0020009	44415PA0020010	44415PA0020011	44415PA0020012	44415PA0020013	44415PA0020014 4	44415PA0020015	44415PA0020016	44415PA0020017	44415PA0020018	44415PA0020019
\$0	2.2 Allowed Claims	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
\$0	2.3 Reinsurance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	2.4 Member Cost Sharing	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	2.5 Cost Sharing Reduction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
\$0	2.6 Incurred Claims	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
\$0	2.7 Risk Adjustment Transfer Amount	\$0	\$0	\$0	\$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	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
0	2.9 Experience Period Member Months	0	0	С	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2.10 Current Enrollment	0	0	c	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	2.11 Current Premium PMPM	#DIV/0!	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00 #DIV/01
	2.12 Loss Ratio	#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!	#DIV/01	#DIV/01	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
	Per Member Per Month																					
	2.13 Allowed Claims	#DIV/0!		#DIV/0			#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0	#DIV/0!			#DIV/0!	#DIV/01	#DIV/01	#DIV/0!	#DIV/0!		#DIV/01 #DIV/01
	2.14 Reinsurance	#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!	#DIV/01	#DIV/0!	#DIV/01	#DIV/0!	#DIV/0!	#DIV/0!
	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!	#DIV/0!	#DIV/01	#DIV/01	#DIV/0!		#DIV/01 #DIV/01
	2.16 Cost Sharing Reduction	#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!	#DIV/01	#DIV/0!	#DIV/01	#DIV/0!	#DIV/0!	#DIV/0!
	2.17 Incurred Claims	#DIV/0!		#DIV/0			#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0			#DIV/0!	#DIV/01	#DIV/01	#DIV/01	#DIV/01	#DIV/0!	#DIV/0!	#DIV/0!
	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!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/01	#DIV/0!	#DIV/01	#DIV/0!	#DIV/01	#DIV/01 #DIV/01
	2.19 Premium	#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!	#DIV/01	#DIV/01	#DIV/0!	#DIV/0!		#DIV/0!
	Section III: Plan Adjustment Factors																					

Section III: Plan Adjustment Factors																					
3.1 Plan ID (Standard Component ID)		44415PA0010001	44415PA0020001	44415PA0020002	44415PA0020003	44415PA0020004	44415PA0020005	44415PA0020006	44415PA0020007	44415PA0020008	44415PA0020009	44415PA0020010	44415PA0020011	44415PA0020012	44415PA0020013	44415PA0020014	44415PA0020015	44415PA0020016	44415PA0020017	44415PA0020018	44415PA0020019
3.2 Market Adjusted Index Rate											\$77	5.96									
3.3 AV and Cost Sharing Design of Plan		0.5883	1.0588	1.0390	0.9894	0.7831	0.8202	0.7592	0.7518	0.5463	0.5279	0.6060	0.8845	0.7166	0.8374	0.6553	0.5830	0.6505	0.4484	0.4980	0.7466
3.4 Provider Network Adjustment		0.9506	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006
3.5 Benefits in Addition to EHB		1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096
Administrative Costs																					
3.6 Administrative Expense		14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%	14.12%
3.7 Taxes and Fees		0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%	0.62%
3.8 Profit & Risk Load		2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%
3.9 Catastrophic Adjustment		1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
3.10 Plan Adjusted Index Rate		\$526.20	\$996.84	\$978.20	\$931.50	\$737.28	\$772.20	\$714.77	\$707.81	\$514.33	\$497.01	\$570.54	\$832.74	\$674.67	\$788.40	\$616.95	\$548.88	\$612.44	\$422.16	\$468.86	\$702.91
3.11 Age Calibration Factor	0.6729										0.6	729									
3.12 Geographic Calibration Factor	1.0000										1.0	000									
3.13 Tobacca Calibration Factor	0.0020										0.0	0.20									

3.13 Tobacco Calibration Factor	0.9928										0.992	28									
3.14 Calibrated Plan Adjusted Index Rate		\$351.53	\$665.95	\$653.49	\$622.30	\$492.54	\$515.88	\$477.51	\$472.86	\$343.60	\$332.03	\$381.15	\$556.32	\$450.72	\$526.70	\$412.16	\$366.69	\$409.14	\$282.03	\$313.22	\$469.59
Section IV: Projected Plan Level Information																					
4.1 Plan ID (Standard Component ID)	Total	44415PA0010001	44415PA0020001	44415PA0020002	44415PA0020003	44415PA0020004	44415PA0020005	44415PA0020006	44415PA0020007	44415PA0020008	44415PA0020009	44415PA0020010	44415PA0020011	44415PA0020012	44415PA0020013	44415PA0020014	44415PA0020015	44415PA0020016	44415PA0020017	44415PA0020018	44415PA0020019
4.2 Allowed Claims	\$743,947,990	\$8,434,115	\$710,010	\$63,641,259	\$114,279,702	\$163,303,090	\$3,043,877	\$22,350,828	\$41,137,178	\$53,858,436	\$36,151,934	\$28,972,831	\$8,410,073	\$7,137,731	\$16,770,072	\$41,416,719	\$11,794,478	\$8,709,738	\$85,600,469	\$22,927,505	\$5,297,945
4.3 Reinsurance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4.4 Member Cost Sharing	\$198,307,207	\$3,122,543	\$38,600	\$4,110,514	\$10,413,571	\$35,532,153	\$586,268	\$5,237,415	\$9,857,417	\$22,050,482	\$15,437,613	\$10,286,190	\$1,276,025	\$1,894,681	\$3,041,326	\$12,980,582	\$4,427,787	\$2,764,271	\$43,491,536	\$10,469,091	\$1,289,143
4.5 Cost Sharing Reduction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4.6 Incurred Claims	\$545,640,783	\$5,311,572	\$671,410	\$59,530,745	\$103,866,131	\$127,770,936	\$2,457,609	\$17,113,413	\$31,279,761	\$31,807,955	\$20,714,322	\$18,686,641	\$7,134,048	\$5,243,051	\$13,728,746	\$28,436,137	\$7,366,691	\$5,945,467	\$42,108,933	\$12,458,413	\$4,008,802
4.7 Risk Adjustment Transfer Amount	\$16,469,456	\$206,661	\$14,047	\$1,268,698	\$2,322,223	\$3,587,941	\$65,978	\$495,263	\$913,906	\$1,265,080	\$851,333	\$672,553	\$177,929	\$160,476	\$361,178	\$949,023	\$275,193	\$199,850	\$2,022,766	\$541,448	\$117,910
4.8 Premium	\$635,560,407	\$6,131,237	\$789,497	\$69,972,504	\$121,963,311	\$149,147,513	\$2,872,594	\$19,959,301	\$36,471,792	\$36,686,201	\$23,856,372	\$21,634,778	\$8,354,046	\$6,104,371	\$16,054,898	\$33,011,890	\$8,516,474	\$6,900,898	\$48,146,506	\$14,313,281	\$4,672,943
4.9 Projected Member Months	928,584	11,652	792	71,532	130,932	202,296	3,720	27,924	51,528	71,328	48,000	37,920	10,032	9,048	20,364	53,508	15,516	11,268	114,048	30,528	6,648
4.10 Loss Ratio	83.68%	83.81%	83.56%	83.56%	83.57%	83.66%	83.63%	83.67%	83.67%	83.81%	83.84%	83.77%	83.62%	83.69%	83.63%	83.73%	83.79%	83.73%	83.93%	83.87%	83.68%
Per Member Per Month																					
4.11 Allowed Claims	\$801.16	\$723.83	\$896.48	\$889.69	\$872.82	\$807.25	\$818.25	\$800.42	\$798.35	\$755.08	\$753.17	\$764.05	\$838.32	\$788.87	\$823.52	\$774.03	\$760.15	\$772.96	\$750.57	\$751.03	\$796.92
4.12 Reinsurance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
4.13 Member Cost Sharing	\$213.56	\$267.98	\$48.74	\$57.46	\$79.53	\$175.64	\$157.60	\$187.56	\$191.30	\$309.14	\$321.62	\$271.26	\$127.20	\$209.40	\$149.35	\$242.59	\$285.37	\$245.32	\$381.34	\$342.93	\$193.91
4.14 Cost Sharing Reduction	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
4.15 Incurred Claims	\$587.61	\$455.85	\$847.74	\$832.23	\$793.28	\$631.60	\$660.65	\$612.86	\$607.04	\$445.94	\$431.55	\$492.79	\$711.13	\$579.47	\$674.17	\$531.44	\$474.78	\$527.64	\$369.22	\$408.10	\$603.01
4.16 Risk Adjustment Transfer Amount	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74	\$17.74
4.17 Premium	\$684.44	\$526.20	\$996.84	\$978.20	\$931.50	\$737.27	\$772.20	\$714.77	\$707.81	\$514.33	\$497.01	\$570.54	\$832.74	\$674.67	\$788.40	\$616.95	\$548.88	\$612.43	\$422.16	\$468.86	\$702.91

Rating Area Data Collection

Specify the total number of Rating Areas in your State by selecting the Create Rating Areas button or Ctrl + Shift + R.

Select only the Rating Areas you are offering plans within and add a factor for each area.

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

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

Rating Area Rating Factor

1.0000

GENERAL OVERVIEW

PURPOSES

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

GENERAL INFORMATION

COMPANY IDENTIFYING INFORMATION

Company Legal Name: Independence Assurance Company ("IAC")

State: Pennsylvania

HIOS Issuer ID (5-digit): 44415

Market: Small Group

Effective Date(s): 1/1/2025 - 3/31/2025, 4/1/2025 - 6/30/2025, 7/1/2025 - 9/30/2025,

10/1/2025 - 12/31/2025

Worksheet 1 of the accompanying URRT contains experience period data and development of the projected Single Risk Pool Gross Premium Average Rate PMPM for the small group market for IAC using the combined experience of Keystone Health Plan East ("KHPE") and QCC Insurance Company, Inc. (QCC). Worksheet 2 contains experience period data and projections by product for the single risk pool for the same entities.

COMPANY CONTACT INFORMATION

Primary Contact Name:

Primary Contact Telephone Number:

Primary Contact Email Address:



PROPOSED RATE INCREASE

The changes to the single risk pool gross premium average rate per member per month (PMPM) from calendar year 2023 to calendar year 2025 were incorporated into the pricing and reflected in the Unified Rate Review Template. The changes are driven by factors including: changes in market-wide population risk morbidity and covered services, increasing unit costs for medical services, increasing utilization of medical services, increasing fees and taxes imposed by the federal government, anticipated costs to administer the plan, and anticipated revenue or payments due to market-wide risk adjustment.

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

We are projecting that claims will increase by 6.9% in 2025. More than half of the change in health care service costs is driven by changes to health care provider fees.

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

The weighted average increase across IAC plans based on projected membership, inclusive of the impact of benefit and cost sharing changes, is 6.88%. The minimum increase is 5.5% and the maximum increase is 7.7%.

WORKSHEET 1: MARKET EXPERIENCE

SECTION I: EXPERIENCE PERIOD DATA

SINGLE RISK POOL

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

PAID THROUGH DATE

Experience period premium, claims, and member months are obtained from the company's internal data warehouse. The claims data is collected for incurred dates from January through December 2023 and paid through February 2024. Earned premiums and member months are for January through December 2023. The data are for all direct-written small group business of KHPE and QCC in the Commonwealth of Pennsylvania.

PREMIUMS IN EXPERIENCE PERIOD

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

ALLOWED AND INCURRED CLAIMS INCURRED DURING THE EXPERIENCE PERIOD

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

Insurer fee-for-service claims expenses and member liabilities for dates of service in January 2023 through December 2023 and paid through February 2024 are sourced from the IBCFOC's internal data warehouse. The claims and member liabilities are completed with incurred but not reported (IBNR)

adjustments to develop ultimate incurred insurer fee-for-service claims expenses and member liabilities for the January through December 2023 period. Capitation amounts are also sourced from the internal data warehouse for the January through December 2023 period but they are not adjusted for IBNR.

Allowed Claims

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

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

IBNR Development

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

The completion factors are developed annually in the 2Q – 3Q period. We do not believe our IBNR is unusually high or unusually low for incurred 2023 paid through February 2024.

Experience Period Index Rate

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

SECTION II: PROJECTIONS

BENEFIT CATEGORIES

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

PROJECTION FACTORS

The estimated incurred claims experience on an allowed basis for January 2023 through December 2023 is projected to the future rating period by several factors.

Morbidity Adjustment

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

INAC-134056112 IAC Small Group

URRT Part III May 15, 2024

3

Demographic Shift

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

Plan Design Changes

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

Other Changes

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

Trend Factors

a. Annualized Cost Trend

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

b. Annualized Utilization Trend

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

c. Quarterly Premium Trend

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

CREDIBILITY MANUAL RATE DEVELOPMENT

The experience period claims for the single risk pool are determined to be fully credible; therefore no credibility adjustment is required.

RISK ADJUSTMENT AND REINSURANCE

Projected Risk Adjustment PMPM

Projected Risk Adjustment is accounted for in Projected Incurred Claims before the state based reinsurance program and Risk Adjustment to reflect anticipated risk adjustment transfer amounts for

the projection period. The amount reflects the projected morbidity for the single risk pool in the projection period.

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

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

The projected risk adjustment amounts for KHPE and Independence Blue Cross (QCC) are consistent with the projection made in the respective submissions. We also considered preliminary 2023 risk transfer results.

MARKET ADJUSTED INDEX RATE

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

The Market Adjusted Index rate is calculated as the Index Rate adjusted for all allowable market-wide modifiers defined in the market rating rules: federal reinsurance program adjustment, risk adjustment and exchange user fees. The Market Adjusted Index Rate reflects the average demographic characteristics of the single risk pool.

WORKSHEET 2: PRODUCT-PLAN DATA COLLECTION

SECTION I: GENERAL PRODUCT AND PLAN INFORMATION

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

AV METAL VALUES

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

INAC-134056112 IAC Small Group 5

SECTION II: EXPERIENCE PERIOD AND CURRENT PLAN LEVEL INFORMATION

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

SECTION III: PLAN ADJUSTMENT FACTORS

The MAIR is adjusted for each plan based on its plan design, provider network, and non-EHBs.

Administrative costs are added to calculate the Plan Adjusted Index Rate. The Plan Adjusted Index Rate is multiplied by the Age Calibration Factor, Geographic Calibration Factor, and Tobacco Calibration Factor to calculate the Calibrated Plan Adjusted Index Rate.

PLAN ADJUSTED INDEX RATE

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

NON-BENEFIT EXPENSES AND PROFIT & RISK

Administrative Expense Load

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

Profit & Risk Load/Contribution to Surplus

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

Taxes and Fees

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

CALIBRATION

The plan adjusted index rate is projected for all products using the same anticipated age distribution and the mandated age curve. Therefore the consumer adjusted premium rate is the plan adjusted index rate divided by the average age, geographic and tobacco factors for the expected distribution. The average age of the combined small group risk pool population is 36.

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

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

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

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

MEMBERSHIP PROJECTIONS

Enrollment is projected based on current and anticipated enrollment by plan. Items impacting these projections include changes in the size of the market due to guarantee issue requirements and the individual mandate changes. There is enrollment as of February 2024.

LOSS RATIO

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

INDEX RATE

The Index Rate is defined as the EHB portion of projected allowed claims divided by all projected single risk pool lives. The Index Rate is the same value for all non-grandfathered plans for IAC Small Group Plans in Pennsylvania. The Index Rate reflects the twelve month projection for calendar year 2025. It has been developed following the specifications of 45 CFR § 156.80(d)(1).

TERMINATED PLANS

There are no plans being terminated during 2025.

WORKSHEET 3: RATING AREAS

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

ACTUARIAL CERTIFICATION

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

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

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

- The projected index rate is:
 - —In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.80 and 147.102);
 - —Developed in compliance with applicable Actuarial Standards of Practice;
 - Reasonable in relation to the benefits provided and the population anticipated to be covered; and
 - -Neither excessive nor deficient.
- The index rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan level rates.
- Geographic rating factors reflect only differences in the costs of delivery of and do not include differences for population morbidity by geographic area.
- The AV Calculator was used to determine the AV Metal Values shown in Worksheet 2 of the Part I Unified Rate Review Template for all plans, unless an alternate methodology was required. When an alternate methodology was used to calculate the AV Metal Value a copy of the actuarial certification required by 45 CFR Part 156, §156.135 was included.

May 15, 2024

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	04 WARRING	Table State 5	Total market beautiful total market beautiful total market beautiful total market beautiful		000 000	100 m
	24 WARRING	===	Total market feller over		900 900 900	200 A
	AND THE PERSON	===			80.0 80.0	200 S
	ALC TO A CONTROL OF THE PARTY O	Part Start			900 900	96.3 20.5 80.0
	AN PARKET		THE RESERVE AND THE PARTY OF TH		60'W 60'W	60 to 60 to
	AN WARRING AN WARRING	Part State	Total Service Service		00.00 00.00 00.00	927 927 97.5
	AN WARRIED AN WARRIED AND WARR	Ten mat	Total Service Services Service Service Service Service		70.00 70.00 70.00 70.00	800 800 800
	AN WARRING	Territoria de la constanta de	Total marks the con-		100 M	W. 1
	AT WARRING		Total market feller road total market feller feller feller road feller feller road feller road feller felle		50.0 50.0 50.0	50.0 50.0
					10.0 10.0	963
		Territoria de la constanta de			80 P	1000
	AN WARRING		Total Inches Adelicated Total Inches Adelicated Total Inches Adelicated Total Inches Adelicated Total Inches Adelicated Total Inches Adelicated Total Inches Adelicated Total Inches Adelicated Total Inches Adelicated Total Inches Inches Total Inches Inches Total Inches Inches Total Inches Total Inches Total Inches Total T		900 900	90
	AN WARRING		Total marks the con-		60.0 60.0	963
	AT WARRING		Total market feller road total market feller feller feller road feller feller road feller road feller felle		190.0 100.0 100.0	90.0 90.0
	AN WARRING AN WARRING		THE HATTO AND THE THE HATTO AND THE		191.0 191.0	987.50 987.50
	AL WARRING	Terror to the te			60.9 60.0 20.0	PEC S PEC S PEC S
	AN TO ANDRON		The court of the c		87.0 M. at M. at	803 803 803
1	AN WARRIED AN WARRIED AN WARRIED AN WARRIED AND AN ADMINISTRATION AND		-		60 M	877 873
The column Column	AND WARRIED AND WA	Part and	THE RESERVE AND THE		60.00 60.00 60.00	0.0 0.0
	## WARRING	Terrore 1	THE REST NAME OF		90.8 90.8	50 S
	## \$74,00000 ## \$74,00000 ## \$74,00000	Terrore t	THE RESERVE AND THE		761.H 762.P 762.H	87.0 87.7 87.0
	02 WARRIED	Terrore 1	Total Inches Security Separate Section Security Separate Section Security		20	200 200
	22 WARRIED		THE CHARLES AND THE		60.00 60.00	92.0 92.0
	AN PARAMETER AND PARAMETER AND PARAMETER AN PARAMETER AND PAR	Tanana i	Total Inches Administration of the control of the c		80 W	90
	AN WARRING	Terrana I	Topic marks there are their marks their our their marks their our		800 600	90
	AT TO ADDRESS		THE RESERVE AND THE		100 P	967
	AN WARREN	Terrore t	Total or the Adelicate Total Total or the Adelicate Total or the Adelicate Total or the Adelicate Total or the Adelicate Total or the Adelicate Total Total or the Adelicate Total To		100	310
	AN PERSONAL PROPERTY AND PERSONAL PROPERTY P		Total Section Sections Total Section Sections Total Section Sections		500 N	100 T
1	0.0 WARRIED 0.0 WA	Ten mil	Total marks below the		(60) (60)	900
	44 WARRING	Table State 5	Total Inches Spicerone		900 900	90.0 20.0
1	02 WARRING 02 WARRING 02 WARRING				90 W 90 W 90 W	20.75 20.75 20.75
	04 WARRING	Tana and	then melte there are		90.0 90.0 90.0	87
	0.0 WARRING	Terrore 1	then may 1		000 000 000	90 S
The content of the	44 WARRING 44 WARRING 44 WARRING	Ten sus			00.0 00.0 00.0	87.5 87.5 87.5
### 1985 1985	AN WARRIED AN WARRIED AN WARRIED AND WARRI	Table State 5	teen meta teen oe		10.0 10.0 10.0	
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	AL WARRIED AND STREET	Para San S	teen meter teen ne		22.0 000	200 873
	02 WARRING 02 WARRING 02 WARRING 02 WARRING	Terrent.	tops make tops		10.0 10.0 10.0	80 T
1	02 WARRING 02 WARRING 02 WARRING				00.0 00.0 00.0 00.0	90 m
	0.0 WARRING OF WARRING	Part Start	then makes there are		100	200
## 1945 1945	02 WARRIED 02 WARRIED 02 WARRIED				790.0 001.0 001.0	90 S 90 S 195 S
### 1997 1997	44 WARRING 44 WARRING 44 WARRING	Territoria de la constantina della constantina d	then melte the one		600 M	917 917
### 19	A49*A0000			*****	900 900	20.7
1	AND TO ADMINISTRATION OF THE PARTIES				00 W	200 200 200
	SE STANSON.	Para sur I	teen meter teen out		678	87
	AND PARTIES. AND PARTIES. AND PARTIES.	===			90.0 90.0 90.0	803 803 80.0
	AND WARRIED AND WA				81.5 81.5 81.5 81.5	80 0 80 0 80 0
	ALI PARAMINA ALI PARAMINA ALI PARAMINA	Terrent.	tops make tops		95.9 95.9	70.0 70.0 70.0
	AND WARRIED AND WA				80.0 80.0 80.0	80 P
	AND TO ANDRESSA.	Tana and	then melte there are		200 200	817 817
	SA PARAMETERS	===			700 900 900	803 803
	AND PROCESSION AND PR	==:			800 800 800	97.7 967.7 967.7
	ALF TO AMERICAN ALF TO AMERICAN ALF TO AMERICAN	Personal Personal	then make the row		900 900	100 to 10
	AND PARAMETERS				100 M	900
	AND PARTIES. AND PARTIES. AND PARTIES.	Terrori.	teer meter teering		105	20
	AL PLANES. AL PLANES. AL PLANES.				6000 5000 5000	200.0
	44 Transmitted				000 000 000	97.0 97.0
	0.0 TO A COLUMN	Table State 5	teen meter teen no		90 90 90	900 900
	02 97400000 02 97400000 02 97400000				10.5 10.5 10.5	6.0 6.0
	0.0 Transmin	Party State S	team marks become		81.5 01.5 01.5	80 B
	AN PARKET				959 959 959	52.0 52.0
1	0.0 TANKER 0.0 TANKER 0.0 TANKER 0.0 TANKER				60.0 60.0 60.0	673 773 793
- 107 H	0.0 Transmin	Para San S	termenta terme		10.0 10.0 10.0 10.0	80
	AN WARRIED AND WAR				60.00 60.00	800 800

ALC: NAME OF				701.00	900
AND DESCRIPTION OF THE PARTY OF	Maria San S Maria San S	San bette berne		- 100 100 100	277 27.0 20.0
				873 873	900
				200	90.0
A4 TO A STATE OF	Terro con t	then belon there are		750.0 750.0	90.0
AND DESCRIPTION OF THE PARTY OF				90.0	1907
AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON AL PARISON	Participants Participants Participants Participants Participants Participants Participants Participants Participants Participants Participants Participants	Manufacture Sanction		100.0 100.0	900
				00.0 00.0	967 S
		Mary the Str. Married		500	\$15 875
				90.0	80.0
	Ratio State S	teen meter teen our		810	201
11 VALUE	Part and 1	then note there are		10. N	907 907
				10.0	80.5 80.5 80.5 90.5 90.5 90.5 80.5 80.5 80.5 80.5 80.5 80.5 80.5
	The column The	then notes there are		979	201 201
				90 W	877 87.0
	Paris State 5	There makes become		80	100 700
11 VALUE				900	803
	Tana and a	teen meter teen no		50.0 50.0	20
***********				60.0	81 S 81 S 81 S 81 S 91 S 91 S
11 VALUE	Ratio State S	teen meter teen ne		75.50 75.50	95.0 95.0
11 VALUE	Part and 1	then note there are		80.0	997
				900	90.0
1100000	Ratio State S	then belon become		750.0 750.0	190 s
			-	950 F	90.0 190.0 190.0 190.0 190.0 190.0
	Patro Sun S	then belon become		96.0	900
				90.0	2007
	Party State 5	THE RESERVE	_	- 25	20.5 20.5 80.0
AND ADDRESS OF THE PARTY OF THE				10° W	57'S
22 TANKS	Tana and a	teen meter teen no		92	# A
*********				100 M	27 E
				87.6	20.0 20.0 20.0
	Talle track	Main marker beautiful		07 S	87.0 87.0
				90.0	87.2 87.2 87.2 87.3 87.4 97.4
-	Part State	teau terte teaune	_	97	87.0 87.0
				97 W	80.0 80.0
AND VALUE OF	Tana and T	Manufacturing		80	\$1.0 \$1.0
AND DESCRIPTION OF THE PERSON NAMED IN				97.0	67 S
AND DESCRIPTION OF THE PARTY OF	Table State 5	San term become		90	89
AND PARTY OF				67.0	70.0 90.0
				90.0 90.0	803 803 803 803 803
	Television I	THE RESERVE AND THE		- 100 100	900
				65.0	90.5
AND DESCRIPTION OF THE PARTY OF	Para State S	team marker team our		100 M	1921
AL PARKET				107	907
			*****	00 M	90.7 90.7 90.7 90.7 90.7 90.7 90.7 90.7
				00 A	877 877
	Participant Company	San neto tarres		90.0 (0.0	90.0 90.0
**********				10° 9	80°0
A4 TO A STATE OF				979	83
A4 TO A STATE OF	Terro con t	then belon become		07.6 07.6	80 t
**********				90 W	80 W
AL PARAMETER AND PARAMETER PARAMETER AND PARAMETER PARAMETER PARAMETER PARAMETER PARAM	Terro tract	teen meter teen ne		018 018	#10 #17
AND ADDRESS OF THE PARTY OF THE				10° F	97.5 97.5
	Tana and a	teen nette teen ne	-	52.5	200
*********				10.0	90.5 97.0 97.0
	Part and	Total market feet over		90.00 90.00	900 900
44 Water				600	9075 9075
A4 TO A STATE OF				90.0 90.0	803 803 803
	Patro Start	then notes there are		197.0	973
AL VANCOS				100.0	903
	Party State 5	then belon become	_	850	313
				10.0	900
## WARREN	Territoria Control	teen nate teen na		1015	300
AND DESCRIPTION OF THE PERSON				979	97.9 97.9
A4 TO A SECTION 1	Terra mana	Total matter total con-		90.0 90.0	807
A4 TO A SECTION 1	Terro con t	tean make team or		10.0	20 20 20 20 20
********				90.0	60
	Terro tract	teen meter teen ne	-	81	200 200 200
ALCOHOL:				100 P	- 27
AL VALUE T	Party State 5	then melte there are		515	250
ALC: NAME: 1				979	973 973 973 973
********	Patro State 5	then be to the orac		820	22.2
ASTRAIGHT !				90.0	800
	Part State 5	then be to the owner		90.0	90.0 90.0 90.0
	Patro and a	Many market features		63	81.0 81.3 81.3 81.0 81.0 81.0
ASTRAIGHT !				- ES	W2
	Part State 1	tern meter termine		701.00 707.00	- 650 Section
				90 W	195.0
AND ADDRESS OF THE PARTY OF THE	Part and	then make the over		100	903 903 903 903 903 903 903 903 903
AND DESCRIPTION OF THE PARTY OF				107.00 107.00	9073
ALTONOMIC DE LA COLUMNIA DE LA COLUM	Territoria S	Manufacturing		195	310
AND PERSONS IN				90.0	#C1
	Part and	See to Section Sections		90.0 91.0	20.0 20.0 20.0 50.0 50.0
	Participant Control			67.6 67.6	613 613 613 613 613
ALCOHOLD !					90 h
				90.7	200
		Manusaria Manusar		91.0 91.0 91.0	
				MI P MI W MI W MI W MI W MI W	900 900 900
AN PARAMETER AND	Ratio State S	Man marks have the		91.0 91.0 91.0 91.0 91.0 91.0 91.0 91.0	800 800 800 800 800 800 800 800 800 800
AL PARENT AL PAR				MI.A MI.B MI.B MI.B MI.B MI.B MI.B MI.B MI.B	90.0 90.0 90.0 90.0 90.0 90.0 90.0
AL PARENT AL PAR	Participants Service State Service	Makes Sacrine Makes over		90.70 90.00	600 600 600 600 600 600 600 600 600 600
AL PARAMETER AND ADMINISTRATION OF PARAMETER AND ADMINISTRATIO	Particular S	Table Santo Marriage		10.00 10	600 971 973 973 973 973 973 973 973 973 973
AL PARAMETERS AND ADMINISTRATION OF THE PARAMETE		Manus Martin, American Manus Martin, American Manus Martin, American Manus Martin, American		100 M 100 M	800 900 900 900 900 900 900 900 900 900
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		Marie Marie Manager		95.1 M	200 200 200 200 200 200 200 200 200 200
AND PARTY OF THE P		Manus Isanina Ma		SULT. SU	900 900 900 900 900 900 900 900 900 900
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				SELE. SELE SELE. SELE SELE. SELE. SELE. SELE. SELE. SELE. SELE. SELE. SELE	100 100 100 100 100 100 100 100 100 100
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	100 mm 1 100 mm 1			301.0 302.0 303.0 30	100 mm m m m m m m m m m m m m m m m m m
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ALTONOTY.					

AL WARREN					979	
		then no	No. Section		10 10 10 10 10 10 10 10 10 10 10 10 10 1	
ALTERNATION N		Total Control Control			W 1	
					90.0 90.0	
AND ADDRESS OF THE PARTY OF THE		team no	No. Service	_	100 H	
					100	
	Part State	Taken Inc	No. have to the			
-					W 10 W 10 W 10 W 10 W 10 W 10 W 10 W 10	
AND ADDRESS OF THE PARTY OF THE	Partie State 5	Total Inc.	No. Income	_	100 M	
A47040000					700 W	
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AND ADDRESS OF THE PARTY OF THE		team or	to the row	-	00 N	
A47040000					90 M	
*********	Partie State 5	Section 100	No. Service		F20.00 F20.00 G20.00	
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	Partie State 5	Total Inc.	No. Income	_	100 P	
AND ADDRESS OF THE PARTY OF THE					600 W	
AND DESCRIPTION OF THE PERSON				-	100 S	
*********					1212 1212	
	Part State 1	Total Inc.	na tauror		95.50 95.50	
AND ADDRESS OF THE PARTY OF THE		team to	No. Security		10.0	
*********					100 M	
*********	Parts State 5	team no	No. Service		979	
*********					96 V	
	Partie State 5	Total Inc.	No. Income		101 M	
A47040000					00 W	
	Partie State 5	Total Inc.	No. Income	_	10.0	
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ALTERNATIVE STREET	Territoria S	Total Inc	No. Security		- 50	
-	===	team or	to the row		600	
*********					70.0	
		San In	No. Service		10 M	
ALTONOMIC STREET				==	W100 W100 W100 W100 W100 W100 W100 W100	
	-	Taken in	No. Security	=	100	
					196.00 077.00 006.00	
AND DESCRIPTION OF THE PERSON	Terror and A	Total Inc	No. Security	_	80.0	
	Patrick Name 2 Patric	********			10 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	
		Total Pro-	No. Security		100 M	
	Part State	1000			- 20	
-					80	
	-	Taken in		=	800	
					90.0	
-	Personal Property lies	Total Inc	No. Security		- 80	
-					900	
-	Parts Start	Total Control	No. September		518	
					90.0	
	Terror and	Total Control			0.00 mg / mg / mg / mg / mg / mg / mg / mg	
APPROPRIES		team or	to the row		00 N	
					100 P	
-	Patro Star S	State to			70.0	
AND DESCRIPTION OF THE PERSON			to town our		100	
-	Personal Property lies	Total Inc	No. Security		80	
ANTONIOS S					60.0	
## WARREST	Terra sun S	Total Da	To the work		100.0	
ALCOHOL:					170 A	
********					97.0 178.9	
	Part and	Salari da Salari da			100	
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	Partie State 5	Total Inc.	No. Security	_	60 A	
			No. Service		90	
	Participa S	Total Pro-	No. Security		50	
					00.00 00.00	
ALTERNATION N	Terror and	Total Control	Ton September 1		90.0 90.0	
APPROPERTY.					90.0	
-					90.0 90.0	
-	Part State	team or	to the row	=	82	
					20.0 00.0	
-	Part State 1	See and			10.0 10.0	
			No. Service		100 M 100 M	
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					W LLW W LLW TO THE THE THE THE THE THE THE THE THE THE	
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AND DESCRIPTION OF				_	SECTION AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF THE PERSON ADDRESS OF T	
AND DESCRIPTION OF THE PERSON	Part Start	Total Inc	No. Service		01.0 01.0	
-	-	topic to	to the row		200	
ALCOHOL:					OLF DATE	
ALCOHOL:	Partie State 5	Section 100	No. Service		761 P	
*********					95.9 95.9	
AND ADDRESS OF THE PARTY OF THE	Partie State 5	Total Inc.	No. Income	_	95.5 97.5	
*********					900	
	Parts Start	Total Control	No. September		89	
					80.0 80.0	
	-		To low		100 M 100 M	
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					100 N	
AL WARREST	-	Total Inc			80	
-			No. Service		90 W	
ALTERNATIVE VIEW PROPERTY AND ADDRESS OF THE PERSON NAMED IN COLUMN TWO IN COLUMN TO THE PERSON NAMED IN COLUMN TO THE PERSON	Part San S	Table 100	To lawyer		10.0	
					100 m	
	-		To low		99	
		-			10 10 10 10 10 10 10 10 10 10 10 10 10 1	
AND DESCRIPTION OF THE PERSON NAMED IN	-				90.0 20.0	
ALCOHOL:	Patrick State 5	Marie III			- 50	
					87	
	Patrick State 6	Total Print			89	
			No. Service		00 M	
-	-		To low		97	
-	-	Taken in	-		100 M	
ASSESSED BY					97.0 97.0	
		team to	No. September		800	
					00.0 00.0	
		Total Inches	to the row		00.0 00.0 00.0 00.0	
AND PARTY OF THE P		State of the state			00.00 001.00 011.00 001.00 001.00 001.00 001.00 001.00 001.00	
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AND TO AND TO THE TO AND TO AN					10.00 10.00	
AND TANKED TO SERVICE		team to			HA HE HE HE HE HE HE HE HE HE HE HE HE HE	
		team to			200 200 200 200 200 200 200 200 200 200	
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**********	No. No.	Name of the second of the seco	No. Married		100 100 100 100 100 100 100 100 100 100	
**********	Participants of the control of the c	Name of the second of the seco	No. Married		76. 10 76. 10 80. 20 80 80. 20 80 80. 20 80 80 80 80 80 80 80 80 80 80 80 80 80	
**********		Name of the second of the seco	No. Married		76. 10 76. 10 80. 20 80 80. 20 80 80. 20 80 80 80 80 80 80 80 80 80 80 80 80 80	
**********		Name of the second of the seco	No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe		76. 10 76. 10 80. 20 80 80. 20 80 80. 20 80 80 80 80 80 80 80 80 80 80 80 80 80	
**********	Part and a	Name of the second of the seco	No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe		76. 10 76. 10 80. 20 80 80. 20 80 80. 20 80 80 80 80 80 80 80 80 80 80 80 80 80	
**********	Part Sur F	Name of the second of the seco	No. Married		76. 10 76. 10 80. 20 80 80. 20 80 80. 20 80 80 80 80 80 80 80 80 80 80 80 80 80	
*********	Participants of the control of the c	Name of the second of the seco	No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe No. Manuscripe		76. 10 76. 10 80. 20 80 80. 20 80 80. 20 80 80 80 80 80 80 80 80 80 80 80 80 80	
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Cover Page

HIOS Issuer ID: 44415

HIOS Product ID: 44415PA001, 44415PA002

Unique Plan Design Supporting Documentation and Justification

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 44415

HIOS Product IDs: 44415PA001, 44415PA002

Applicable HIOS Plan IDs (Standard Component): 44415PA0020002, 44415PA0020001, 44415PA0020003, 44415PA0020004, 44415PA0020005, 44415PA0020006, 44415PA0020007, 44415PA0020008, 44415PA0020009, 44415PA0020010, 44415PA0010001, 44415PA0020011, 44415PA0020019, 44415PA0020012, 44415PA0020013, 44415PA0020014, 44415PA0020015, 44415PA0020016, 44415PA0020017, 44415PA0020018

Purpose of document:

The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning 1/1/2025. As prescribed by law, the AV calculation was based on the AV calculator to the full extent possible. The AV is meant to represent the average percent of costs paid by the insurer for a standard population and may vary from actual member experience. The resulting AV was based on prescribed methodology and, therefore, may not reasonably reflect the actuary's estimate of the portion of allowed costs covered by the health insurance plan. The AV was determined based on the plan's benefits and coverage data, the standard population, and utilization and continuance tables published by HHS for purposes of the valuation of AV. This actuarial analysis is not appropriate for any other purposes.

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

The cost-sharing for laboratory outpatient and professional services for a subset of these plans varies by site of service. Lab work done at the office or a free-standing facility has zero cost-sharing, while lab work done by a hospital has 50% coinsurance after deductible (if applicable). Laboratory outpatient and professional services account for roughly 3% of allowed costs in the AV calculation.

The cost-sharing for occupational and physical therapy for a subset of these plans varies by site of service. Occupational and physical therapy accounts for roughly 2% of allowed costs in the AV calculation.

The cost-sharing for x-rays and diagnostic imaging for a subset of these plans varies by site of service. X-rays and diagnostic imaging accounts for roughly 3% of allowed costs in the AV calculation.

The cost-sharing for imaging (CT/PET scans, MRIs) for a subset of these plans varies by site of service. Imaging accounts for roughly 2% of allowed costs in the AV calculation.

The outpatient facility fee cost-sharing for a subset of these plans varies by site of service. Services have different copays or coinsurances for a free-standing facility setting and a hospital setting. Outpatient facility fee accounts for about 13% of allowed costs in the AV calculation.

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

The cost sharing of specialist care for a subset of these plans is a combination of copays for office visits in person and virtual care. Specialist services account for about 8% of allowed costs in the AV calculation.

The cost-sharing for Outpatient Mental Health and Substance Abuse for these plans varies between Office visits and All Other services. Outpatient Mental Health and Substance Abuse accounts for about 4% of allowed costs in the AV calculation.

The cost-sharing for Generic Drugs for a subset of these plans varies between low-cost Generics and normal Generics. Generic Drugs accounts for about 4% of allowed costs in the AV calculation.

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

Method 156.135(b)(2) was used for laboratory site of service (for plans with no deductible), outpatient facility, primary care, specialist care, occupational and physical therapy, x-rays, imaging, outpatient mental health and substance abuse, and generic drugs cost-sharing.

Method 156.135(b)(3) was used for laboratory site of service cost-sharing (for plans with deductibles).

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

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

Description of the standardized plan population data used:

For the freestanding and hospital utilization data for outpatient facility, we considered our commercial PPO and HMO data incurred between January 2023 and December 2023.

For the freestanding and hospital utilization data for laboratory services, we considered our commercial PPO data incurred between January 2023 and December 2023.

For the physical therapy and radiology site-of-service utilization, we considered our commercial PPO data incurred between January 2023 and December 2023.

For the primary care and specialist utilization, we used our commercial PPO and HMO data incurred between January 2023 and December 2023.

For the outpatient mental health and substance abuse utilization, we used our commercial PPO data incurred between January 2023 and December 2023. For average cost per unit, we used our commercial PPO and HMO data incurred between January 2023 and December 2023.

For the generic drugs utilization, we used our commercial PPO and HMO data incurred between January 2023 and December 2023.

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:

Laboratory Site-of-service Differential for Plans with No Deductible

For the lab site of service cost-sharing, our recent data suggested that 20% of units are at a hospital setting with an average unit cost of \$58.81, while 80% of units are at a freestanding setting with an average unit cost of \$21.78. Taking a weighted average of a 50% issuer coinsurance applied to \$58.81 and a 100% issuer coinsurance applied to \$21.78 produced an average issuer paid amount of \$23.30 out of an average cost of \$29.18, giving an effective issuer coinsurance of 79.9% which was entered into the AV calculator. This applies to plans 44415PA0020002, 44415PA0020001, 44415PA0020003, 44415PA0020004, and 44415PA0020005 only.

Occupational and Physical Therapy Site-of-service Differential

For the physical therapy site of service cost-sharing, our recent data indicated that 80% of utilization came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of the copays at each site.

X-rays and Diagnostic Imaging Site-of-service Copay Differential

For the x-ray site of service cost-sharing, our recent data indicated that 30% of utilization came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

X-rays and Diagnostic Imaging Site-of-service Coinsurance Differential

For the x-ray site of service cost-sharing, our recent data indicated that 25% of claims came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of coinsurance based on claims at each site.

Imaging (CT/PET scans, MRIs) Site-of-service Copay Differential

For the imaging site of service cost-sharing, our recent data indicated that 30% of utilization came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

Imaging (CT/PET scans, MRIs) Site-of-service Coinsurance Differential

For the imaging site of service cost-sharing, our recent data indicated that 20% of claims came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of coinsurance based on claims at each site.

		Cos	t-sharing	
HIOS ID	Service Type	Preferred Site	Non-preferred Site	AV Input
	Phys. Ther.	\$20	\$50	\$26.00
44415PA0020002	X-rays	\$40	\$80	\$68.00
	Imaging	\$125	\$250	\$212.50
	Phys. Ther.	\$40	\$70	\$46.00
44415PA0020003	X-rays	\$40	\$80	\$68.00
	Imaging	\$125	\$250	\$212.50
	Phys. Ther.	\$20	\$50	\$26.00
44415PA0020001	X-rays	\$40	\$80	\$68.00
	Imaging	\$125	\$250	\$212.50
	Phys. Ther.	\$80	\$110	\$86.00
44415PA0020004	X-rays	\$70	\$175	\$143.50
	Imaging	\$150	\$300	\$255.00
	Phys. Ther.	\$80	\$110	\$86.00
44415PA0020005	X-rays	\$70	\$175	\$143.50
	Imaging	\$150	\$300	\$255.00
	Phys. Ther.	\$40	\$80	\$48.00
44415PA0020006	X-rays	20%	40%	65%
44413FA0020000	Imaging	20%	40%	64%
	Phys. Ther.	\$80	\$110	\$86.00
44415PA0020007	X-rays	10%	10%	90%
44413PA0020007	Imaging	10%	10%	90%
	Phys. Ther.	\$80	\$110	\$86.00
44415PA0020008	X-rays	\$100	\$250	\$205.00
	Imaging	\$250	\$500	\$425.00
	Phys. Ther.	\$100	\$130	\$106.00
44415PA0020009	X-rays	\$80	\$200	\$164.00
744131 A0020003	Imaging	\$200	\$400	\$340.00
	Phys. Ther.	\$80	\$110	\$86.00
44415PA0020010	X-rays	30%	50%	55%
444131 M0020010	Imaging	30%	50%	54%

Outpatient Facility Fee Site-of-service Differential

For the outpatient facility site of service cost-sharing, our recent data indicated that 80% of outpatient facility claims came from the hospital setting. This assumption was used for plans with coinsurance cost-sharing for outpatient facility. Our recent data indicated that 55% of outpatient facility utilization came from the hospital setting. This assumption was used for plans with copay cost-sharing for outpatient facility.

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

		Cost-sha	aring	
HIOS ID	Service Type	ASC	Hospital	AV Input
44415PA0020002	OP Facility	\$50	\$100	\$77.50
44415PA0020003	OP Facility	\$50	\$100	\$77.50
44415PA0020001	OP Facility	\$50	\$100	\$77.50
44415PA0020004	OP Facility	\$300	\$700	\$520.00
44415PA0020005	OP Facility	\$150	\$350	\$260.00
44415PA0020006	OP Facility	20%	50%	56%
44415PA0020007	OP Facility	10%	30%	74%
44415PA0020009	OP Facility	\$400	\$750	\$592.50
44415PA0020010	OP Facility	30%	50%	54%

Primary Care Copay Differential

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

	Cost - s	sharing	
HIOS_ID	PCP	Virtual PCP	AV Input
44415PA0020002	\$10	\$5	\$ 9.25
44415PA0020001	\$10	\$5	\$ 9.25
44415PA0020003	\$20	\$15	\$ 19.25
44415PA0020004	\$40	\$30	\$ 38.50
44415PA0020005	\$40	\$30	\$ 38.50
44415PA0020006	\$20	\$15	\$ 19.25
44415PA0020007	\$40	\$30	\$ 38.50
44415PA0020008	\$40	\$30	\$ 38.50
44415PA0020009	\$50	\$35	\$ 47.75
44415PA0020010	\$40	\$30	\$ 38.50
44415PA0020012	\$25	\$20	\$ 24.25

Specialist Copay Differential

For specialist visits, our recent data indicated that 95% of utilization came from office visits in person and 5% from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

	Cost - s	sharing	
HIOS_ID	SP	Virtual SP	AV Input
44415PA0020002	\$20	\$10	\$ 19.50
44415PA0020001	\$20	\$10	\$ 19.50
44415PA0020003	\$40	\$25	\$ 39.25
44415PA0020004	\$80	\$55	\$ 78.75
44415PA0020005	\$80	\$55	\$ 78.75
44415PA0020006	\$40	\$25	\$ 39.25
44415PA0020007	\$80	\$55	\$ 78.75
44415PA0020008	\$80	\$55	\$ 78.75
44415PA0020009	\$100	\$70	\$ 98.50
44415PA0020010	\$80	\$55	\$ 78.75
44415PA0020012	\$50	\$35	\$ 49.25

Combination of Cost-sharing for Outpatient Mental Health and Substance Abuse

For the outpatient mental health and substance abuse cost-sharing, our recent data indicated that 75% of outpatient mental health utilization came from office visits. The cost-sharing entered into the AV calculator is a blend of the cost-sharing for outpatient mental health office visits and the cost-sharing for all other outpatient mental health services. For plans where this cost-sharing is a combination of copay and coinsurance, a separate exhibit has been included to show the development of the effective copay that was used in the AV calculator.

	Cost - s	sharing	
HIOS_ID	MH/SA Office	MH/SA Other	AV Input
44415PA0020002	\$20	\$20	\$ 20.00
44415PA0020001	\$20	\$20	\$ 20.00
44415PA0020003	\$40	\$40	\$ 40.00
44415PA0020004	\$80	\$80	\$ 80.00
44415PA0020005	\$80	\$80	\$ 80.00
44415PA0020008	\$80	\$80	\$ 80.00
44415PA0020009	\$100	\$100	\$ 100.00
44415PA0010001	20%	20%	80%
44415PA0020011	0%	0%	100%
44415PA0020019	0%	0%	100%
44415PA0020013	0%	0%	100%
44415PA0020014	0%	0%	100%
44415PA0020015	30%	30%	70%
44415PA0020016	10%	10%	90%
44415PA0020017	50%	50%	50%
44415PA0020018	0%	0%	100%

For plans 44415PA0020006, 44415PA0020007, 44415PA0020010, and 44415PA0020012, the cost-sharing for outpatient mental health was input in the AV calculator as an effective copay to capture the blending of a copay for outpatient mental health visits and coinsurance for all other outpatient mental health services. For plans 44415PA0020006 and 44415PA0020012, the coinsurance for all other outpatient mental health services was effective after the deductible. Accordingly, the effective copays for these plans were developed to recognize separate costs for when the member was in the deductible. We determined a utilization split for services in the deductible using the plan's deductible value and our CPD model.

OP Visit Cost-sharing	44415PA0020006 \$40	44415PA0020007 \$80
OP Visit Weight	75%	75%
Avg Cost/Unit OP Other	\$269.32	\$269.32
OP Other Cost-sharing in Deductible	100%	N/A
OP Other Weight in Deductible	7%	N/A
OP Other Cost-sharing after Deductible	20%	0%
OP Other Weight after Deductible	18%	25%
Effective Copay (AV Input)	\$57.54	\$60.00

OP Visit Cost-sharing OP Visit Weight	44415PA0020010 \$80 75%	44415PA0020012 \$50 75%
Avg Cost/Unit OP Other	\$269.32	\$269.32
OP Other Cost-sharing in Deductible	N/A	100%
OP Other Weight in Deductible	N/A	9%
OP Other Cost-sharing after Deductible	30%	10%
OP Other Weight after Deductible	25%	16%
Effective Copay (AV Input)	\$80.20	\$66.74

Generic Drugs Copay Differential

For generic drugs, our recent data indicated that 40% of utilization came from low-cost generic drugs. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization for low-cost generic drugs and normal generic drugs.

	Cost - sha	ring	
HIOS_ID	Low-Cost Generic	Generic	AV Input
44415PA0020002	\$3	\$10	\$ 7.20
44415PA0020001	\$3	\$10	\$ 7.20
44415PA0020003	\$3	\$10	\$ 7.20
44415PA0020004	\$3	\$15	\$ 10.20
44415PA0020005	\$3	\$15	\$ 10.20
44415PA0020006	\$3	\$20	\$ 13.20
44415PA0020007	\$3	\$20	\$ 13.20
44415PA0020008	\$5	\$25	\$ 17.00
44415PA0020009	\$5	\$25	\$ 17.00
44415PA0020010	\$5	\$25	\$ 17.00
44415PA0010001	\$5	\$25	\$ 17.00
44415PA0020011	\$3	\$10	\$ 7.20
44415PA0020019	\$3	\$20	\$ 13.20
44415PA0020012	\$3	\$20	\$ 13.20
44415PA0020013	\$3	\$20	\$ 13.20
44415PA0020014	\$5	\$25	\$ 17.00
44415PA0020015	\$5	\$25	\$ 17.00
44415PA0020016	\$5	\$25	\$ 17.00
44415PA0020017	\$7	\$30	\$ 20.80

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

Laboratory Site-of-service Differential for Plans with Deductible

For the lab site of service cost-sharing, our recent data indicated that 20% of lab claims came from the hospital setting.

Using the AV calculation resulting from method 156.135(b)(2), two separate AVs were calculated; the first AV was calculated with zero lab cost-sharing to reflect lab work done by an office or free-standing facility, and the second AV was calculated with 50% coinsurance after deductible to reflect lab work done by a hospital. The final AV for the plan was then calculated by taking a weighted average of the two AVs using the utilizations by lab site. The following exhibit details this calculation.

	AV			
HIOS ID	Free-standing	Hospital	Average	
44415PA0020006	79.32%	77.91%	79.04%	
44415PA0020007	80.84%	79.09%	80.49%	
44415PA0020008	71.36%	69.41%	70.97%	
44415PA0020009	70.49%	68.48%	70.09%	
44415PA0020010	71.52%	69.57%	71.13%	

Utilization	80%	20%
Othization	0070	2070

Certification Language:

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

The analysis was

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

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

Actuary signa	nture:		
Actuary Print	ted Name:		
Data	4/20/2024		

AV screenshots redacted.

No adjustment was made for the impact of COVID in the Experience Period th	at we do not expect to recur in the Projection Period
The adjustment was made for the impact of COVID in the Experience Feriod th	at we do not expect to recur in the Projection Period.

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

The change in the average age was measured by comparing the average age factor calculated in this filing, based on February 2024 enrollments, to the average age factor calculated for the prior annual filing.

	2024	2025	
	Filing	Filing Ch	nange
Age Factor	1.502	1.486	0.989
Geographic Factor	1.000	1.000	1.000
Tobacco Factor	1.007	1.007	1.000
Total change			0.989

No changes were assumed for this filing.

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

The network factor used for PPO was 1.000.

The network factor used for EPO was 0.950.

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

Table 10 factors: PPO 1.001

EPO 0.951

REDACTION JUSTIFICATION – IAC SMALL GROUP

DOCUMENT

<u>URRT Part III – Federal Actuarial Memorandum</u>

Redacted Name of opining actuary (page 8)
Redacted Company Contact Information (page 1) – name, telephone number, email address

PA Actuarial Memorandum

Redacted Name of opining actuary (pages 7 and 8)
Redacted Company Contact Information (page 1) – name, telephone number, email address

Cover Letter

Redacted names and contact information (page 2)

AV Screenshots

Entire File Redacted

Unique AV Justification file

Redacted name of opining actuary (page 13) Redacted AV Screenshots (all)

2024 and 2025 Service Area

Issuer: Independence Assurance Company

Market: Small Group



Key (modify as needed)

: On-exchange service area

: Off-exchange only service area

Responses to Section E, Standard Questions

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

We began issuing IAC plans in force as of 2024. We do not project that 2025 membership will differ significantly from the current membership when combined with enrollments into plans offered by QCC.

2. <u>a. Experience Period Claims</u>: a. Please confirm that all claims which are capitated have been removed from the experience period claims.

We confirm that capitated claims have been removed.

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

We confirm that non-EHB claims have been removed.

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 work with our PBM to forecast rx rebate increases from the base period to the rating period. These projected increases are fully reflected in the trend component of the rate development.

3. <u>COVID</u>: 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 is no COVID adjustment in Tables 2-4. No COVID adjustment was made in Table 5.

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.

We have used a quarterly trend of 1.5% in Table 5A which is slightly below the Annual Trend in Table 3. We believe that this more moderate trend will be reflective of trend going from 2025 to 2026.

b. [SG. Only] In Table 5A, if cells K32:M32 are left to equal J32, please explain why that is a reasonable assumption.

These cells are equal to cell J32. We are anticipating relatively smooth increases to the Index

rate going from 2025 to 2026 for these plans.

5. <u>Table 6 – Retention</u>

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.

We confirm that we used a Federal Income Tax rate of 21% in this calculation.

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.

We confirm that these factors are consistent.

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.

We confirm that the commission PMPM is consistent between the four options. Open Enrollment and Special Enrollment are consumer concepts and do not apply to small group business.

6. Pricing AVs

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

We confirm that the Pricing AV's were calculated using a single risk pool.

b. Please identify and support any differences between the company's metallic AV calculator results and the corresponding Pricing AVs.

Metal AV is a national average AV which is not intended for pricing purposes per CMS Guidance (noted below). Please see attached model for Pricing AV calculation. The metal AV is based on the AV calculator which is calibrated to national average costs. The Philadelphia market is significantly more expensive than the national average from a cost of services standpoint. The same deductible or copay is worth significantly less as a percentage of total allowed cost in the Philadelphia market compared to the national average. This leads to different Pricing AVs for the same metal level.

Pricing based on local data should give a more accurate result than pricing using national data. Our pricing model is using data that is more aligned with of how members buying these plans in this area will use them than another model which relies on national data.

In addition, CMS continues to state that "the AV Calculator is intended to establish a comparison tool and was not developed for pricing purposes" in its Actuarial Calculator Methodology.

This is further supported by the Society of Actuaries paper, "A Summary of the 2020 Actuarial Value Calculator", which states " It is important to remember that the AV calculator was designed to determine if specific benefit designs meet the de minimis criteria and not for plan pricing."

7. Expanded Bronze Plans

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

Please see the attached "EBP" exhibit.

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.

The proposed geographic area rating factors shown in Tab V are the same as those used in the previous year.

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

The proposed network factors shown in Tab V are the same as those used in the previous year. Within Table 10, they are normalized using the membership in Table 10 to result in a composite factor of 1.000.

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. Pricing is the information which was projected in the final annual filing for the given year (i.e., 2021 pricing information is from the plan year 2021 annual filing submitted in 2020)
- 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. Pricing is the information which was projected in the final annual filing for the given year (i.e., 2020 pricing information is from the plan year 2020 annual filing submitted in 2019)

IAC is a new entity. Plans were not issued prior to 2024.

10. Plan of Withdrawal:

 Please confirm that a Plan of Withdrawal has been submitted if any plans are being discontinued. No withdrawals are proposed in this filing.

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.

There are no transitional plans.

12. Copay Adjustment Programs

a. Does the company use a copay adjustment program (also known as a copay accumulator program)?

Yes, IBX has copay card maximizer and accumulator adjustment programs in place.

b. How does the company handle copay assistance coupons? For example, does the coupon apply to the MOOP?

The manufacturer coupon programs are used to reduce/eliminate the member cost share and save on the cost of the medication. Because they are not an out of pocket expense for the member they do not count towards 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.

We reduced our pharmacy trend by 0.7%. This was based on guidance provided to us by our PBM rather than an internal study.

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

These plans satisfy the requirements by providing first dollar coverage (before deductible) as follows:

IAC	HIOS IDs	Plan Marketing Name	<u>HSA Plan</u>
	44415PA0020017	Personal Choice PPO Bronze HSA-0 \$5,600/50%	X
	44415PA0020018	Personal Choice PPO Bronze HSA-0 \$8,300/100%	Х

Completeness and Redaction Justification Checklist

Issuer Name: Independence Assurance Company

Market: Small Group PPO SERFF ID: INAC-134056112

	1	Redaction Justification		ustification	
тос#	Description	Completed (Mark with "X")	Redacted (Y/N)	Page # in Public PDF	Justification submitted (Y/NA)
Federal Do	ocuments Required to Be Filed with PID				
	RFJ Part I - Unified Rate Review Template	Х			
A.2.	RFJ Part II – Consumer Friendly Justification				
A.Z.	RFJ Part III – Actuarial Memorandum	Х	Υ	37-45	Υ
	Federal Rates Template	Х			
Summary	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 Actuari	ial Memorandum and Rate Exhibits				
D.1.A.	Company Information	X	Υ	4	Υ
D.1.B.	Rate History & Proposed Variation in Rate Changes	X	N	5	N/A
D.1.C.	Average Rate Change	X	N	5	N/A
D.1.D.	Membership Count	X	N	5	N/A
D.1.D.	PA Act. Exhibits Table 1	Х	N	12	N/A
D.1.E.	Benefit Changes	Х	N	5	N/A
D.1.F.	Experience Period Claims & Premium	Х	N	5	N/A
	PA Act. Exhibits Table 2	Х	N	12	N/A
D.1.G.	Credibility of Data	X	N	6	N/A
	PA Act. Exhibits Tables 2b, 3b, 4b (if applicable)	X	N	13	N/A
D.1.H.	Trend Identification	Х	N	6-7	N/A
	PA Act. Exhibits Table 3	Х	N	12	N/A
D.1.I.	Historical Experience	Х	N	7	N/A
	PA Act. Exhibits Table 4	Х	N	12	N/A
D.2.A.	Development of PAIR, MAIR and Total Allowed Claims	Х	N	7-8	N/A
	PA Act. Exhibits Table 5	Х	N	14	N/A
D.2.B.	Retention Items	Х	N	8-9	N/A
	PA Act. Exhibits Table 6	Х	N	14	N/A
D.2.C.	Normalized Market-Adjusted Projected Allowed Total Claims	Х	N	9	N/A
	PA Act. Exhibits Table 7	Х	N	14	N/A
	Components of Rate Change	Х	N	9	N/A
D.2.D.	PA Act. Exhibits Table 8	Х	N	14	N/A
	PA Act. Exhibits Table 9	X	N	14	N/A
D.3.	Plan Rate Development	Х	N	9	N/A
	PA Act. Exhibits Table 10	X	N	16	N/A
D.4.	Plan Premium Development for 21-Year-Old Non-Tobacco User	X	N	10	N/A
	PA Act. Exhibits Table 11	X	N	17-18	N/A
D.5.A.	Age and Tobacco Factors	X	N	10	N/A
	PA Act. Exhibits Table 12	X	N	19	N/A
D.5.B.	Geographic Factors	X	N	10	N/A
	PA Act. Exhibits Table 13	X	N	19	N/A
D.5.C.	Network Factors	X	N	10	N/A
	PA Act. Exhibits Table 14	X	N	19	N/A
D.5.D	Rate Change Request Summary PA Act. Exhibits Table 15	X	N	20	N/A
D.F. F		X	N	20	N/A
D.5.E.	Service Area Composition	X	N	10	N/A
D.5.F	Composite Rating	X	N	10	N/A
D.6.	Actuarial Certifications	X	Y	10-11	Y
Additional		V	N1	22.22	NI/A
E.	Department Plan Design Summary & Rate Tables	X	N	22-33	N/A
Cumaras	Service Area Map	X	N	76	N/A
Summary	Documents/Confirmation of HIOS & SERFF Submissions	Х			Υ

State:Pennsylvania

TOI:H16G Group Health - Major Medical

Sub-TOI:H16G.003C Small Group Only - PPO Standard

Filing Type:Rate - G.I. (Guaranteed Issue)

Filing Company:Independence Assurance Company

SERFF Tracking Number:INAC-134056112
State Tracking Number:INAC-134056112
Company Tracking Number:IAC SG 1-1-2025

Product Name: IAC Small Group PPO effective 1-1-2025

Project Name:
Destruction Date:

Objection Letter Status: Data Request Sent

Objection Letter Date: 06/05/2024

Respond By Date:

Submitted Date: 06/05/2024 04:33 PM

Dear David Walker,

Introduction:

The Pennsylvania Insurance Department has received and conducted a review of the above captioned filing. To complete the review, we are requesting the following information. To facilitate a timely review, we request this information be provided by June 19. If you have any questions or difficulties in providing the information within this time frame, please call me.

Please note, each response to a Department data call must contain a cover letter that details the changes made to the Actuarial Memorandum and Pennsylvania Actuarial Memorandum Exhibits and the reasons why the changes were made, e.g., in response to question number 5.

- (1) Please provide quantitative and qualitative support for the assumed trends, which are substantially higher that the trends that can be derived from the monthly data in Table 4b. Also, provide specific support for the assumed utilizations, which are driving the overall trend, for the negative cost trend pharmacy benefits, and for the weighting of capitated claims.
- (2) The answer to Standard Question 5 indicates that the filing incorporates the final Risk Adjustment User Fee of \$0.18. Please revise the entry in PAAME Table 6 cell C54 to generate 18 cents in cell D54, and make no offsetting adjustments in the filing.
- (3) Regarding the Pricing AVs
- a. Please describe the process used to develop the pricing AVs for the plans.

- b. Please describe the data underlying the model used to develop pricing AVs.
- c. Please explain how the model used to develop pricing AVs was calibrated and the allowed PMPM to which the model is calibrated.
- d. Please explain any changes that were applied to the model used to develop pricing AVs for varying metal tiers.
- (4) Please provide QCC small group MLR results per standard question #9, and respond to all parts of this question based on QCC information:
- a. What is the history of rebates paid for this entity and market?
- b. How was this history of rebates considered in the current rate filing?
- c. Given this history what considerations lead the company to believe the projected MLR will be achieved in 2025?
- d.What action(s) has the company taken or does the company anticipate taking to mitigate the possibility and magnitude of future rebate indications?
- e. What are the top 3 pricing assumptions that the company sees as driving the difference between the projected and actual MLR results?
- (5) Section 2E of the actuarial memorandum shows the development of the MLR for the projection period. Please show these same data values for the experience period, and show how the projection period values were based on and informed by these experience period values.
- (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.
- (7) Please support and providing an exhibit quantifying each of the factors listed in the actuarial memorandum that combine to result in the Change In Other Factor shown in Exhibit 5, or indicate that there is no change in any of the listed factors.
- (8) Please describe and show the development of the assumed Change in Network Factor as well as any underlying network factors, and clarify why the HMO and PPO factors do not normalize to 1.0 given that the rate development is based on the combined experience of both entities.
- (9) 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.
- (10) Please reconcile the figures shown the How It Plans To Spend Your Money box in Table 15 with the

percentages shown in Table 6.

- (11) Please compare the projected 2025 risk adjustment transfer amount PMPM to the anticipated 2023 risk adjustment transfer amount PMPM, identifying the specific driver(s) of any differences between the two values and providing detailed support for those differences.
- (12) Please provide the actual observed trends based on historical allowed claims experience for the combined QCC and KHPE individual population for each benefit category as well as in aggregate for years 2021, 2022, and 2023, and 2024 (year to date, with the understanding that 2024 trends will be partially based on estimated claim costs. In providing your response, for each calendar year, provide the total member months, allowed claims, and any normalization adjustments applied to the claims experience. Provide both raw and COVID-19 adjusted values as applicable.
- (13) Please compare the proposed total annual trend rate to the actual observed trend rates per your response above as well as to the trends indicated by the monthly data provided in Table 4b. To the extent that these trends are significantly different, please explain and justify the reasons that this is the case.
- (14) Please discuss why the company anticipates a negative prescription drug cost trend in its total trend determination.
- (15) 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.
- (16) Given that the combined QCC and KHPE experience is used as the manual rate, please demonstrate the adjustments applied to the blended experience to reflect the expected morbidity of the KHPE population in the projection period. Similarly, please demonstrate the adjustments applied to the blended experience to reflect the expected risk adjustment of the specific entity's population in the projection period.
- (17) The company has shared CMS's position that the AV Calculator is intended to establish a comparison tool and was not developed for pricing purposes, and states that 1) its pricing model is using data that is more aligned with of how members buying these plans in this area will use them than another model which relies on national data and that 2) the Philadelphia market is significantly more expensive than the national average from a cost of services standpoint. This would seem to lead to pricing AVs that exceed the AV calculator values for all metal levels; please clarify why the pricing AVs are generally higher than the AV calculator values for platinum and gold plans, and lower than the AV calculator values for all other plans.
- (18) Please provide an explanation of and support for the level of the General & Claims Administrative

Expenses as shown in Table 6, as well as the reasons for any changes in the level of these expenses from the plan year 2023 filing. I note that the total expenses are relatively high on a percentage basis.

- (19) Please discuss the difference between the Allowed Claims reported in Table 2 and those reported in Table 4.
- (20) Please identify and show the development of the Projected Allowed Non-EHB Claims PMPM as shown in Table 5.
- (21) Please identify the drivers of the proposed aggregate rate change (base experience, trend, risk adjustment, demographics, metal mix, etc.) referenced in Section 1(C) of the PA actuarial memorandum.
- (22) Please provide actual 2024 member months and experience data for the first 3 or 4 months of the 2024, in the format of Table 2, so that the Department can consider this emerging data in light of past MLR results, and comment on any aspects of the data that are significantly deviating from expectations.
- (23) 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.
- (24) Please note that aggregate rate adjustment percentages are derived from Table 11, rather than Table 10 which was the source of this figure in past years.
- (25) Please revise the actuarial memorandum to show actual numerical assumptions where possible, such as the trend referenced in Section 1(H).
- (26) 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.

Please be advised that there may be additional questions based on the Department's ongoing review as well as the company's responses to the above.

Responses to this data request should be provided via SERFF in Microsoft Excel worksheets. Please retain all formulas.

Should you have any questions regarding this correspondence, please contact me at (717) 783-2115 or mgurgiolo@pa.gov.

Conclusion:

Although this objection letter constitutes an official action taken by the Department on your filing pursuant to 40 P.S. § 3801.304, this filing cannot be deemed approved. Please also note that these objections do not constitute a formal disapproval. The Department remains willing to work with you to bring this form into compliance with all of Pennsylvania's applicable insurance laws and regulations. Although every effort is made to raise any and all defects identified in the initial review of the filing, please understand that revisions to the form or your responses to the objections below might prompt additional objections that could not have been raised previously.

Sincerely, Michael Gurgiolo

1. Please provide quantitative and qualitative support for the assumed trends, which are substantially higher that the trends that can be derived from the monthly data in Table 4b. Also, provide specific support for the assumed utilizations, which are driving the overall trend, for the negative cost trend pharmacy benefits, and for the weighting of capitated claims.

Please see the response to question 12 and 13, which addresses this question as well.

2. The answer to Standard Question 5 indicates that the filing incorporates the final Risk Adjustment User Fee of \$0.18. Please revise the entry in PAAME Table 6 cell C54 to generate 18 cents in cell D54, and make no offsetting adjustments in the filing.

We acknowledge that the correct amount is \$0.18.

- 3. Regarding the Pricing AVs
- a. Please describe the process used to develop the pricing AVs for the plans.
- b. Please describe the data underlying the model used to develop pricing AVs.
- c. Please explain how the model used to develop pricing AVs was calibrated and the allowed PMPM to which the model is calibrated.
- d. Please explain any changes that were applied to the model used to develop pricing AVs for varying metal tiers.

Because IBX's relativity pricing methodology is proprietary and confidential, IBX is submitting the responses to these questions in a separate document. IBX requests that the separate document containing IBX's confidential and proprietary pricing methodology not be disclosed or made publicly available because doing so would put IBX at an unfair competitive disadvantage. If the Department intends to make IBX's proprietary and confidential relative pricing methodology publicly available, IBX respectfully requests that the Department notify IBX and its Legal Department before the release of any confidential and proprietary information.

Please refer to the "Response to IAC Small Group Q3 AVs 06_14_2024" excel worksheet for the rebate history.

- 4. Please provide QCC small group MLR results per standard question #9, and respond to all parts of this question based on QCC information:
- a. What is the history of rebates paid for this entity and market?
- b. How was this history of rebates considered in the current rate filing?
- c. Given this history what considerations lead the company to believe the projected MLR will be achieved in 2025?
- d. What action(s) has the company taken or does the company anticipate taking to mitigate the possibility and magnitude of future rebate indications?
- e. What are the top 3 pricing assumptions that the company sees as driving the difference between the projected and actual MLR results?

QCC and IAC are two distinct legal entities and IAC has no rebate history.

During the period of 2020 through 2022, IBX MLR rebates were primarily affected by:

• COVID: impact of lower utilization from deferred/avoided care

- PBM compensation (difference between what IBX paid IBX's PBM, and what the PBM pays the pharmacy). PBM compensation was not included in the projected MLR calculation at time of pricing, however PBM compensation was reflected as a claims expense in the MLR filing as instructed in a 2011 CMS technical notice on this topic. This difference increased the rebated that IBX issued to customers.
- General favorability in trends vs expectations

These drivers will continue to influence the 3-year calculation for several more years. For the 2025 projection period, COVID is not expected to be a material trend driver and IBX has moved to a pass through pricing arrangement with our PBM (effective beginning 1/1/23). These items are not expected to drive a variance to pricing in 2025+.

5. Section 2E of the actuarial memorandum shows the development of the MLR for the projection period. Please show these same data values for the experience period, and show how the projection period values were based on and informed by these experience period values.

Pricing for 2025 begins with the experience period claims (2023 in this case) being trended forward to the projection period. We then add retention items that are already on a 2025 basis and then we calculate the 2025 MLR and ensure that it is above the threshold. The experience period MLR is not needed for this calculation.

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.

We used the projected premium from the URRT Part I for this calculation. There are different rounding rules between the URRT Part I and the PAAM Exhibit resulting in small differences in the values. Specifically, the URRT projected premium (cell D82 of Worksheet 2) is \$684.52, while Table 6 of the PAAM Exhibit shows \$675.45 in cell C64. Using either of these values does not affect our MLR compliance.

7. Please support and providing an exhibit quantifying each of the factors listed in the actuarial memorandum that combine to result in the Change In Other Factor shown in Exhibit 5, or indicate that there is no change in any of the listed factors.

The value of 1.000 in cells C21 and D21 are projecting no change for this rate filing specifically for factors not separately shown above them.

8. Please describe and show the development of the assumed Change in Network Factor as well as any underlying network factors, and clarify why the HMO and PPO factors do not normalize to 1.0 given that the rate development is based on the combined experience of both entities.

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

It is unlikely that this factor will remain constant over time, due to the impact of Risk Adjustment, as well as the mixes of the different provider networks offered by the two entities. A summary of the factors is shown on Tab Q8 of the "IAC Small Group Response to June 5 Obj" excel worksheet.

The "Change in Network Factor" is applied prior to the consideration of Risk Adjustment in the calculations which would not allow us to maintain the proper rating relationships between KHPE and IAC if that factor were required to composite to 1.000.

9. 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.

The trends are consistent. We did not change the formula in the Rate Change Summary from what was originally written.

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

How It Plans To Spend Your Money Exhibit does not incorporate all of the aspects of the MLR calculation for the MLR threshold purposes, e.g. QI and 3-year rolling average. This is included in our pricing methodology.

11. Please compare the projected 2025 risk adjustment transfer amount PMPM to the anticipated 2023 risk adjustment transfer amount PMPM, identifying the specific driver(s) of any differences between the two values and providing detailed support for those differences.

We request that this response be deferred until the updated 2023 risk adjustment is released.

12. Please provide the actual observed trends based on historical allowed claims experience for the combined QCC and KHPE individual population for each benefit category as well as in aggregate for years 2021, 2022, and 2023, and 2024 (year to date, with the understanding that 2024 trends will be partially based on estimated claim costs. In providing your response, for each calendar year, provide the total member months, allowed claims, and any normalization adjustments applied to the claims experience. Provide both raw and COVID-19 adjusted values as applicable.

Please refer to Tab Q12&Q13 of the "IAC Small Group Response to June 5 Obj" excel worksheet.

13. Please compare the proposed total annual trend rate to the actual observed trend rates per your response above as well as to the trends indicated by the monthly data provided in Table 4b. To the extent that these trends are significantly different, please explain and justify the reasons that this is the case.

Please refer to Tab Q12&Q13 of the "IAC Small Group Response to June 5 Obj" excel worksheet.

14. Please discuss why the company anticipates a negative prescription drug cost trend in its total trend determination.

IBX renegotiated our rates with our PBM and have passed that savings through the pricing. The savings had not become effective until after the experience period and was not effective for those

claims. We are also removing coverage for GLP1 drugs for weight loss purposes effective 2025. This produced savings relative to 2024.

15. 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.

Please see the response to question 17, which addresses this question as well.

16. Given that the combined QCC and KHPE experience is used as the manual rate, please demonstrate the adjustments applied to the blended experience to reflect the expected morbidity of the KHPE population in the projection period. Similarly, please demonstrate the adjustments applied to the blended experience to reflect the expected risk adjustment of the specific entity's population in the projection period.

We request that this response be deferred until the updated 2023 risk adjustment is released.

17. The company has shared CMS's position that the AV Calculator is intended to establish a comparison tool and was not developed for pricing purposes, and states that 1) its pricing model is using data that is more aligned with of how members buying these plans in this area will use them than another model which relies on national data and that 2) the Philadelphia market is significantly more expensive than the national average from a cost of services standpoint. This would seem to lead to pricing AVs that exceed the AV calculator values for all metal levels; please clarify why the pricing AVs are generally higher than the AV calculator values for platinum and gold plans, and lower than the AV calculator values for all other plans.

Because IBX's relativity pricing methodology is proprietary and confidential, IBX is submitting the responses to these questions in a separate document. IBX requests that the separate document containing IBX's confidential and proprietary pricing methodology not be disclosed or made publicly available because doing so would put IBX at an unfair competitive disadvantage. If the Department intends to make IBX's proprietary and confidential relative pricing methodology publicly available, IBX respectfully requests that the Department notify IBX and its Legal Department before the release of any confidential and proprietary information.

Please refer to the "Response to IAC Small Group Q17 AVs 06_14_2024" excel worksheet for the rebate history.

18. Please provide an explanation of and support for the level of the General & Claims Administrative Expenses as shown in Table 6, as well as the reasons for any changes in the level of these expenses from the plan year 2023 filing. I note that the total expenses are relatively high on a percentage basis.

General and claims administrative expenses for 2025 include operational expenses such as customer service, enrollment and billing functions, claims processing, clinical, sales and marketing expenses, and corporate services such as Finance and HR support. Expenses have increased year-over-year on a PMPM basis due to inflationary pressures and increasing staffing costs, as well as membership mix across Independence impacting cost allocations.

19. Please discuss the difference between the Allowed Claims reported in Table 2 and those reported in Table 4.

Allowed Claims in Cell G36 of Table 2 = the sum of claims in cells K97 through K108 less the sum of cells J97 through J108, taken from Table 4.

20. Please identify and show the development of the Projected Allowed Non-EHB Claims PMPM as shown in Table 5.

This rate filing does not include any plan withdrawal or transition pursuant to 45 CFR 146.152(d)(3)(i) and 45 CFR 147.106(d)3)(i). While the form filing with which this rate filing is associated does include a change in dental vendor, there is no YOY change in dental benefits that would necessitate a Plan of Withdrawal under either the above-referenced federal requirements or the Department's own guidance as clarified for Independence in a March 14, 2024 call with Department counsel. The projected cost for the adult vision benefit comes from our vendor.

21. Please identify the drivers of the proposed aggregate rate change (base experience, trend, risk adjustment, demographics, metal mix, etc.) referenced in Section 1(C) of the PA actuarial memorandum.

Please see table below for a summary of the impact for combined QCC, IAC, and KHPE Small Group business. (Rounded to the nearest 0.1%)

Trend (unit cost + utilization)	8.1%
Prior years claims favorability relative to pricing	-2.7%
Changes in Admin and other factors	1.7%
Overall Rate change	7.1%

22. Please provide actual 2024 member months and experience data for the first 3 or 4 months of the 2024, in the format of Table 2, so that the Department can consider this emerging data in light of past MLR results, and comment on any aspects of the data that are significantly deviating from expectations.

Please refer to Tab Q22 of the "IAC Small Group Response to June 5 Obj" excel worksheet.

23. 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.

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

24. Please note that aggregate rate adjustment percentages are derived from Table 11, rather than Table 10 which was the source of this figure in past years.

Our actuarial memorandum cited both percentages, which are the same in this filing.

25. Please revise the actuarial memorandum to show actual numerical assumptions where possible, such as the trend referenced in Section 1(H).

Our standard practice is to include numbers in the Excel-based AM Exhibits which are supporting documentation to the Word-based memo. Insomuch as the Word-based memo contains a narrative description of the pricing process, we feel it would be redundant and inappropriate to include numbers in the Actuarial Memorandum.

26. 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.

After reviewing the retention information we confirmed that the items match. No revisions were made.

State:Pennsylvania

TOI:H16G Group Health - Major Medical

Sub-TOI:H16G.003C Small Group Only - PPO Standard

Filing Type:Rate - G.I. (Guaranteed Issue)

Filing Company: Independence Assurance Company

SERFF Tracking Number:INAC-134056112
State Tracking Number:INAC-134056112
Company Tracking Number:IAC SG 1-1-2025

Product Name: IAC Small Group PPO effective 1-1-2025

Project Name:
Destruction Date:

Objection Letter Status: Data Request Sent

Objection Letter Date:07/04/2024

Respond By Date: 07/17/2024

Submitted Date: 07/04/2024 10:15 AM

Dear David Walker,

Introduction:

The Pennsylvania Insurance Department has received and conducted a review of the company's responses to the Department's data call concerning the subject filing. In order to complete this review, the Department requests the following information. To facilitate the review process, we request this information be provided by July 17; if you have any questions or difficulties in providing the information within this time frame, please contact me.

Please note that each response to a Department data call must contain a cover letter that details the changes made to the Actuarial Memorandums and PA Actuarial Memorandum Exhibits and the reasons why the changes were made, e.g., in response to the Department's objection 5.

- 1) As trend is the primary driver of the proposed rate increase, please address the following concerns:
- i) The 12-month moving average trend is higher for the most recent months than for the months immediately prior;
- (a) How does the company anticipate that this is the result of cost and utilization differences between 2021, a year when care was still being deferred, and 2023, when conditions were reverting to the norm and some deferred care was being sought?
- (b) How does the company anticipate that trends will develop in the post-Covid era relative to the historical

claim costs and trends, in light of the previously mentioned considerations and past experience?

- ii) The utilization trend is uniformly 4.29%; please provide the rationale and data that supports the expectation of significantly increasing utilization year after year, in addition to the assumed cost trend, as well as the increase for 3.79% in the prior filing.
- iii) Please support the component weightings in Table 3, including Other Medical to which a 0% weight is assigned.
- iv) Please clarify and support the magnitude of the Projected Service Mix/Intensity Trend.
- 2) Regarding prior objection 2, please incorporate the \$0.18 Risk Adjustment User Fee into the PAAME in cell C54 of Table 6. Please include this revision in the update requested in Objection 1.
- 3) Regarding objection 6, please clarify the rounding rules that result in the cited values.
- 4) Round 1 objection questions 11 and 16 remain outstanding.
- 5) Regarding objection 8, to clarify, does the Change in Network factor not normalize to 1.0 as a result of the risk adjustment payments/receipts for the HMO/PPO also not normalizing to 1.0 (i.e. the magnitude of the aggregate Change in Network factor offsets the aggregate risk adjustment payment/receipt)?
- 6) Objection 20 of my previous correspondence references non-EHB claims; please respond to this question.
- 7) I note that the historical Medical Loss Ratios are consistently and significantly below expected levels as well as below minimum allowable levels, resulting in rebate payments. The company cites three factors in response to prior objection 4 that have driven these results in recent years, and indicates that Covid and PBM will not impact the claims and rebate calculations in 2025 and subsequent years. Given that the third factor was favorable trends vs expectations, independent of Covid, and in light of the proposed trend levels, please quantify the impact of the first two factors, i.e. unanticipated Covid impact and PBM compensation (which the explanation appears to indicate would increase the actual MLR relative to the projected level).
- 8) Regarding objection 14, given the indication that the removal of coverage of GLP1 drugs for weight loss will have a material impact on projected claims relative to the experience period, please support the assumption of no favorable Change in Benefits adjustment in Table 5?

- 9) Please support the assumption that Philadelphia is a high cost area with regarding to medical costs, in light of the Risk Adjustment GCF factors that consider rating area 8 to be near the statewide average.
- 10) In regard to objection 22, please comment on any aspects of the emerging data that are deviating from expectations.

Please be advised that there may be additional questions based on the responses to the above. However, it is our hope to avoid 3rd round data calls. Towards this end, please provide complete, detailed and thorough responses including supporting data and narrative.

Responses to this request should be provided via SERFF with supporting data in Microsoft Excel spreadsheets. Please retain all formulas.

Should you have any questions regarding this correspondence, please contact me at (717) 783-2115 or email me at mgurgiolo@pa.gov.

Conclusion:

Although this objection letter constitutes an official action taken by the Department on your filing pursuant to 40 P.S. § 3801.304, this filing cannot be deemed approved. Please also note that these objections do not constitute a formal disapproval. The Department remains willing to work with you to bring this form into compliance with all of Pennsylvania's applicable insurance laws and regulations. Although every effort is made to raise any and all defects identified in the initial review of the filing, please understand that revisions to the form or your responses to the objections below might prompt additional objections that could not have been raised previously.

Sincerely, Michael Gurgiolo

- 1. As trend is the primary driver of the proposed rate increase, please address the following concerns:
- i) The 12-month moving average trend is higher for the most recent months than for the months immediately prior;
 - a. How does the company anticipate that this is the result of cost and utilization differences between 2021, a year when care was still being deferred, and 2023, when conditions were reverting to the norm and some deferred care was being sought?

We do not believe that 2023 had significant COVID impact, rather we believe that 2023 is more in line with normal utilization levels and that 2025 will have increased utilization relative to 2023 as reflected in our utilization trends.

b. How does the company anticipate that trends will develop in the post-Covid era relative to the historical claim costs and trends, in light of the previously mentioned considerations and past experience?

It is our anticipation that we will see increased and accelerated unit cost and utilization trends in the future time periods relative to what we have seen historically. This is driven by a few key factors:

- 1) Providers in our geography are requiring significantly higher unit cost increases than they have in the past few years and we expect this trend to continue.
- 2) The average utilization per thousand of services continues to increase even after adjusting for the COVID utilization spike noted above.
- 3) Mix of services continues to change as well e.g. more high cost drugs and new drugs being created at a faster rate. This also impacts the utilization trend.
- ii) The utilization trend is uniformly 6.8% (4.29%), which is consistent with prior years; please provide the rationale for and data that supports the expectation of significantly increasing utilization year after year, in addition to the assumed cost trend.

The response for this question is included in Part 1. Note regarding pharmacy, there were some drugs that we expected to come to market that did not materialize in the experience period. WE still expect that these drugs will eventually come to market by the projection period and that is reflected in our trend. Specific examples are gene therapy drugs which were recently approved (E.g. Roctavian). These were anticipated in the experience period, but were not approved until after the experience period.

iii) Please support the component weightings in Table 3, including Other Medical to which a 0% weight is assigned.

The component weightings are based on the percentage that each of these medical service categories make up in the experience period. Please refer to the URRT Part 1 for a numeric demonstration of this. Regarding Other Medical, we do not have any services in this category as all services were classified in one of the other categories e.g. Inpatient, Outpatient, Professional.

iv) Please clarify and support the magnitude of the Projected Service Mix/Intensity Trend.

Exhibit F was created based on our New Jersey market requirements. Please see link below for the Exhibit and instructions on the DOBI website.

 $\frac{https://view.officeapps.live.com/op/view.aspx?src=https\%3A\%2F\%2Fwww.nj.gov\%2Fdo\%2Fdivision_insurance\%2Fihcseh\%2Fratefilings\%2FExhibitFTrendComponentsPY2025.xlsx\&wdOrigin=BROWSELINK$

2. Regarding prior objection 2, please incorporate the \$0.18 Risk Adjustment User Fee into the PAAME in cell C54 of Table 6. Please include this revision in the update requested in Objection 1.

We have made this change in the PAAME.

3. Regarding objection 6, please clarify the rounding rules that result in the cited values.

Our previous response incorrectly referred to the calculations we used for another state's filings.

The premium used in the MLR Exhibit is equal to the 2025 Calibrated Plan Adjusted Index Rate PMPM in Cell AA15 of Table 10 in the PAAME multiplied by the Aggregate Calibration Factor in cell T7 of Table 10. This is representative of the premium we expect to receive.

4. Round 1 objection questions 11 and 16 remain outstanding.

We acknowledge that these questions have not been answered yet. We will provide answers to these questions once CMS releases the final 2023 Risk Adjustment Report.

5. Regarding objection 8, to clarify, does the Change in Network factor not normalize to 1.0 as a result of the risk adjustment payments/receipts for the HMO/PPO also not normalizing to 1.0 (i.e. the magnitude of the aggregate Change in Network factor offsets the aggregate risk adjustment payment/receipt)?

Yes, that makes sense.

6. Objection 20 of my previous correspondence references non-EHB claims; please respond to this question.

Please refer to Tab Q6 of the "Response to IAC Small Group Obj July 4" Excel worksheet for the development of the Projected Allowed Non-EHB Claims PMPM.

7. I note that the historical Medical Loss Ratios are consistently and significantly below expected levels as well as below minimum allowable levels, resulting in rebate payments. The company cites three factors in response to prior objection 4 that have driven these results in recent years, and indicates that Covid and PBM will not impact the claims and rebate calculations in 2025 and subsequent years. Given that the third factor was favorable trends vs expectations, independent of Covid, and in light of the proposed trend levels, please quantify the impact of the first two factors, i.e. unanticipated Covid impact and PBM compensation (which the explanation appears to indicate would increase the actual MLR relative to the projected level).

Of the three factors that affected Independence's Medical Loss Ratio calculations over the past several years, the most significant factor is the reclassification of the PBM compensation (difference between what Independence paid IBX's PBM, and what the PBM pays the pharmacy). Because of a 2011 CMS technical notice on Medical Loss Calculation, for many years PBM compensation was included as claims expense in the projected MLR calculation at the time of pricing. In 2023, CMS

issued guidance that PBM compensation should be treated as administrative expense which resulted in a recalculation of the Medical Loss Ratio for numerous years. Because of the change in CMS' guidance, the recalculated Medical Loss Ratios were below the Medical Loss Ratio levels expected at the time of pricing.

Specifically, the PBM compensation represents about 3% of expected claims cost in the years where it was treated as a claims cost.

The COVID impact was relatively small for the 2022 and 2023 time periods. It was significant in 2020 and 2021.

8. Regarding objection 14, given the indication that the removal of coverage of GLP1 drugs for weight loss will have a material impact on projected claims relative to the experience period, please support the assumption of no favorable Change in Benefits adjustment in Table 5?

We have removed coverage for GLP1 drugs for weight loss. Note that they are still covered for other diagnoses, such as for diabetes. We define a change in benefit as something that impacts member cost share, so for example changes to deductible, coinsurance, or copay would be a change in benefit. The removal of GLP1 we would consider to be a change in medical policy and that is covered under the utilization trend.

9. Please support the assumption that Philadelphia is a high cost area with regarding to medical costs, in light of the Risk Adjustment GCF factors that consider rating area 8 to be near the statewide average.

When stating that Philadelphia is a high-cost area, Independence is specifically referring to allowed amounts e.g. the average cost per day of admission. Because the allowed amounts are higher than the rest of the state, member cost sharing as a percentage will be lower in Philadelphia. The GCF factors include both these unit cost items as well as utilization items. It is Independence's belief that Independence's GCF is close to the statewide average because Independence's customers purchase only a small number of non-ACA qualified plans, e.g. limited duration plans and health sharing ministries. These types of plans are far more popular throughout the state than in Independence's service area. It is Independence's belief that these non-ACA plans are siphoning off the better risk in other parts of the state leading to worse risk being in ACA insured plans. Independence further believes, the GCF for the rest of the state is higher than it would be if ACA insured plans were more popular throughout the state. Independence believes that this phenomenon is impacting risk adjustment, given that the non-ACA plans are not subject to risk adjustment payments. As a result, Independence is paying far more for risk adjustment than is fair and appropriate under the federal guidance. Independence welcomes the Insurance Department support in addressing this vitally important issue.

10. In regard to objection 22, please comment on any aspects of the emerging data that are deviating from expectations.

The emerging experience is still very immature and members may also be in their deductible periods for plans with deductibles, which depresses emerging experience relative to the ultimate level.

State:
Pennsylvania
TOI:
H16G Group Health - Major Medical
Sub-TOI:
H16G.003C Small Group Only - PPO Standard
Filing Type:
Rate - G.I. (Guaranteed Issue)
Filing Company:
Independence Assurance Company
SERFF Tracking Number:
INAC-134056112
State Tracking Number:
INAC-134056112
Company Tracking Number:
IAC SG 1-1-2025
Product Name:
IAC Small Group PPO effective 1-1-2025
Project Name:
Destruction Date:
Objection Letter Status:Data Request Sent
Objection Letter Date:07/24/2024
Respond By Date:07/31/2024
Submitted Date:07/24/2024 03:53 PM
Dear David Walker,
Introduction:
The Pennsylvania Insurance Department has received and conducted a review of the company's responses to the Department's data call concerning the subject filing. In order to complete this review, the Department requests the following information. To facilitate the review process, we request this information be provided by July 31; if you have any questions or difficulties in providing

the information within this time frame, please contact me.

Please note that each response to a Department data call must contain a cover letter that details the changes made to the Actuarial Memorandums and PA Actuarial Memorandum Exhibits and the reasons why the changes were made, e.g., in response to the Department's objection 5.

- 1) Please provide the relevant information included in the link provided, which was not functional; include the purpose and development of the Service Mix/Intensity trend, and indicate why this trend is included in this Pennsylvania rate filing.
- 2) Please compare the projected 2025 risk adjustment transfer amount PMPM to the anticipated 2023 risk adjustment transfer amount PMPM for QCC, identifying the specific driver(s) of any differences between the two values and providing detailed support for those differences.
- 3) Given that combined QCC and KHPE experience is used as the manual rate, please demonstrate the adjustments applied to the blended experience to reflect the expected morbidity of the KHPE population in the projection period. Similarly, please demonstrate the adjustments applied to the blended experience to reflect the expected risk adjustment of the specific entity's population in the projection period.
- 4) Please update the 2023 experience period risk adjustment amount in Table 2 to reflect the final CMS risk adjustment amount for QCC released on July 22.
- 5) If the projected risk adjustment transfer amount in Table 5 will be modified due to the final CMS transfer amount for QCC published on July 22nd, please provide narrative and detailed supporting data to justify the proposed changes.
- 6) 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.
- 7) 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
- i. Public PDF with limited redactions as previously directed in the Guidance (includes all correspondence and supporting exhibits after the initial submission, in addition to all the above items).

Please be advised that there may be additional questions based on the responses to the above. Please provide complete, detailed, and thorough responses including supporting data and narrative. Responses to this data request should be provided via SERFF with supporting data in Microsoft Excel spreadsheets. Please retain all formulas.

Should you have any questions regarding this correspondence, please contact me at (717) 783-2115 or email me at mgurgiolo@pa.gov.

Conclusion:

Although this objection letter constitutes an official action taken by the Department on your filing pursuant to 40 P.S. § 3801.304, this filing cannot be deemed approved. Please also note that these objections do not constitute a formal disapproval. The Department remains willing to work with you to bring this form into compliance with all of Pennsylvania's applicable insurance laws and regulations. Although every effort is made to raise any and all defects identified in the initial review of the filing, please understand that revisions to the form or your responses to the objections below might prompt additional objections that could not have been raised previously.

Sincerely,

Michael Gurgiolo

1. Please provide the relevant information included in the link provided, which was not functional; include the purpose and development of the Service Mix/Intensity trend, and indicate why this trend component is included in this Pennsylvania rate filing.

The exhibit was provided in response to this question from the June 5, 2024 objection letter:

• Please compare the proposed total annual trend rate to the actual observed trend rates per your response above as well as to the trends indicated by the monthly data provided in Table 4b.

We attempted to use a format from New Jersey rate filing requirements as a template. The Service Mix/Intensity trend is representative of items such as mix of services withing a category (e.g., moving from OP facility to standalone APC).

2. Please compare the projected 2025 risk adjustment transfer amount PMPM to the anticipated 2023 risk adjustment transfer amount PMPM for QCC, identifying the specific driver(s) of any differences between the two values and providing detailed support for those differences.

We are not revising our projections for 2025 risk adjustment.

3. Given that the combined QCC and KHPE experience is used as the manual rate, please demonstrate the adjustments applied to the blended experience to reflect the expected morbidity of the KHPE population in the projection period. Similarly, please demonstrate the adjustments applied to the blended experience to reflect the expected risk adjustment of the specific entity's population in the projection period.

We are pricing to the average risk of our combined population since members can pick between KHPE and QCC when shopping.

4. Please update the 2023 experience period risk adjustment amount in Table 2 to reflect the final CMS risk adjustment amount released on July 22.

We have updated the 2023 risk adjustment consistent with the CMS 2023 Risk Adjustment Summary Report released recently.

5. If the projected risk adjustment transfer amount in Table 5 will be modified due to the final CMS transfer amount for QCC published on July 22nd, please provide narrative and detailed supporting data to justify the proposed changes.

We are not revising our projections for 2025 risk adjustment.

6. 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.

We confirm that we tested the rates in Table 11 of the Actuarial Memorandum Exhibits, PA Plan Design Summary and Rate Tables, and Federal Rate Templates and concluded that they are identical.

7. 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
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- i. Public PDF with limited redactions as previously directed in the Guidance (includes all correspondence and supporting exhibits after the initial submission, in addition to all the above items).

We have posted these in SERFF.