

SERFF Tracking #:	INAC-132358831	State Tracking #:	INAC-132358831	Company Tracking #:	QCC SG 1-1-2021
State:	Pennsylvania	Filing Company:	QCC Insurance Company		
TOI/Sub-TOI:	H15G Group Health - Hospital/Surgical/Medical Expense/H15G.003 Small Group Only				
Product Name:	QCC Small Group PPO effective 1-1-2021				
Project Name/Number:	/				

Supporting Document Schedules

Satisfied - Item:	ACA Public Rate Filing PDF
Comments:	
Attachment(s):	Public Rate Filing QCC Small Group 09012020.pdf
Item Status:	
Status Date:	



May 21, 2020

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

SUBMITTED VIA SERFF

**RE: QCC Insurance Company, Inc.
Small Group PPO Rate Filing effective 1/1/2021
INAC-132358831**

Dear Ms. Gray:

Attached is the 2021 annual rate filing for PPO plans of QCC Insurance Company, Inc. (QCC) in the Small Group marketplace in the Commonwealth of Pennsylvania. Rates for new and renewing plans are being filed and satisfy market reform requirements of the Affordable Care Act (ACA).

This rate filing includes rates for these plans and specifies compliance with rating requirements of the ACA. The enclosed is for rating periods effective from January 1, 2021 through December 31, 2021.

The proposed rates represent a 0.9% increase over the previously approved 2020 rates.

Information for the Pennsylvania Bulletin:

1.	Company Name and NAIC Number:	QCC Insurance Company, Inc. 93688
2.	Market	Small Group
3.	On or Off Exchange	Off
4.	Effective Date of Coverage	January 1, 2021
5.	Average Rate Change Requested	0.9%
6.	Range of Rate Changes Requested	-0.2% to 7.8%
7.	Total Annual Revenue Generated from the Proposed Rate Change	\$5,044,860
8.	Products	PPO
9.	Rating Areas and Change from 2020	Rating Area 8 No Change from 2020
10.	Metal Levels and Catastrophic Plans	Platinum, Gold, Silver, Bronze



- | | | |
|-----|--|--|
| 11. | Current covered lives and policyholders as of February 1, 2020 | 75,484 covered lives |
| 12. | Number of plans offered in 2021 and change from 2020 | 18 plans in 2021; 19 plans in 2020 |
| 13. | Corresponding contract form number, SERFF, and binder numbers | Please see appendix. |
| 14. | HIOS Issuer ID # and submission tracking Number | HIOS Issuer ID # 31609; Tracking # 31609-1751467485967847432 |

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

Sincerely,

[REDACTED]

cc:

[REDACTED]



APPENDIX

SERFF ID #s:

INLG-132355866

INLG-132355908

INBC-132356011

INBC-132356016

Form Numbers

16884.WR-III Rev. 1.21

16884-BC.SG.OFF Rev. 1.21

16884-BC.SG.OFF.HSA.HRA Rev. 1.21

17014.WR Rev. 1.21

17014-BC.SG.OFF.HSA Rev. 1.21

16905.WR.KDPOS Rev. 1.21

16905-BC.SG.KDPOS.OFF Rev. 1.21

16906.WR.ADPOS Rev. 1.21

16906-BC.SG.ADPOS.OFF Rev. 1.21

PREV/SCH-II Rev. 1.21

Attachment I

Rate Change Summary

QCC Insurance Company, Inc. – Small Group Plans

Rate request filing ID # INAC-132358831 - 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

<http://www.insurance.pa.gov/Consumers/ACARelatedFilings/>

Overview

Initial requested average rate change:	0.9%
Revised requested average rate change:	N/A
Range of requested rate change:	-0.2% to 1.4%
Effective date:	January 1, 2021
Mapped Members:	75,484
Available in:	Area 8

Key information

Jan. 2019-Dec. 2019 financial experience

Premiums	\$530,340,438
Claims	\$398,162,023
Administrative expenses	\$50,256,705
Taxes & fees	\$14,493,123
Company made (after taxes)	\$67,428,587

How it plans to spend your premium

This is how the insurance company plans to spend the premium it collects in 2021:

Claims:	83.7%
Administrative:	11.8%
Taxes & fees:	2.5%
Profit:	2.0%

The company expects its annual medical costs to increase **12.1%**.

Explanation of requested rate change

QCC Insurance Company ("QCC") is revising premium rates for the Pennsylvania Small Group ACA compliant products, effective from January 1, 2021.

About 75,000 members will be affected.

Changes in Taxes and Fees:

The Federal government ended the Health Insurance Providers Fee beginning with premiums due in 2021. This lowers 2021 premium rates by about 3.4%.

Changes in Medical Service Costs:

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

Financial Experience of the Product:

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

Changes in Benefits:

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

Administrative Costs:

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

PENNSYLVANIA ACTUARIAL MEMORANDUM

PURPOSES

This Actuarial Memorandum is provided along with the Unified Rate Review Template (URRT) and PA Actuarial Memorandum Rate Exhibits to provide certain information to support the gross premium for the single risk pool for small group market health care insurance underwritten by QCC Insurance Co., Inc. 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:	QCC Insurance Co., Inc. ("QCC")
State:	Pennsylvania
NAIC #:	93688
Market:	Small Group
Marketplace:	Off Exchange
Effective Date(s):	1/1/2021 – 3/31/2021, 4/1/2021 – 6/30/2021, 7/1/2021 – 9/30/2021, 10/1/2021 – 12/31/2021
Average Rate Change:	0.9%
Range of Rate Changes:	-0.2% to 7.8%
Products:	PPO
Rating Areas:	Rating Area 8
Metal Levels:	Platinum, Gold, Silver, Bronze
Current Members:	75,484
Number of 2021 Plans:	18
HIOS Issuer ID (5-digit):	31609

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 31609.

COMPANY CONTACT INFORMATION

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

B. RATE HISTORY AND PROPOSED VARIATIONS IN RATE CHANGES

January 1, 2015	8.50%	INAC- 129626740
October 1, 2015	-0.30%	INAC- 130111048
January 1, 2016	6.51%	INAC- 129939280
January 1, 2017	5.00%	INAC- 130539936
July 1, 2017	2.00%	INAC- 130959332
January 1, 2018	9.41%	INAC- 131005785
July 1, 2018	0.05%	INAC- 131403779
January 1, 2019	-1.80%	INAC- 131478429
April 1, 2019	-0.09%	INAC- 131750255
July 1, 2019	-1.80%	INAC- 131860461
January 1, 2020	11.53%	INAC- 131927133
April 1, 2020	8.00%	INAC- 132132177

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

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

C. AVERAGE RATE CHANGE

The average proposed rate change shown in Cell AC15 of Table 10 is -2.1%. The changes to the single risk pool gross premium average rate per member per month (PMPM) from calendar year 2019 to calendar year 2021 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 -0.2%.

D. MEMBERSHIP COUNT

Table 1 illustrates the Experience Period member-months, Current Period members as of February 1, 2020, and Projected Rating Period Member-months by ages.

E. BENEFIT CHANGES

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

F. EXPERIENCE PERIOD CLAIMS AND PREMIUMS

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

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 2019 and paid through February 2020. Earned premiums and member months are for January through December 2019. 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 2019 risk transfer results.

In the URRT v5.1, it is necessary to divide Risk Adjustment by the Paid to Allowed factor when it is used in calculations based on Allowed Claims to produce calculations that are consistent with the Actuarial Memo Rate Exhibit.

G. CREDIBILITY OF DATA

The experience period data is considered 100% credible.

H. TREND IDENTIFICATION

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

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

I. HISTORICAL EXPERIENCE

Table 4 illustrates historical experience from 2016 through 2019 for the product line.

a. Annualized Cost Trend

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

b. Annualized Utilization Trend

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

J. TERMINATED PLANS

The following plan is being terminated during 2021:

31609PA0150033 Personal Choice PPO Gold HSA-25 \$2,600/80%

2. RATE DEVELOPMENT AND CHANGE

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

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

Changes in Population Risk Morbidity

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

COVID-19 Impact

Morbidity was increased by an additional 1% to account for the impact of COVID-19 on overall projected claims.

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 2021 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		14.61%
General and Claims	8.45%	
Agent/Broker Fees and Commissions	5.36%	
Quality Improvement Initiatives	0.80%	
Taxes and Fees		2.48%
Risk Adjustment User Fee	0.03%	
PCORI Fee	0.04%	
PA Premium Tax	2.00%	
Federal Income Tax	0.42%	
Health Insurance Providers Fee	0.00%	
Profit/Contingency		2.00%
Total Retention		19.09%

C. NORMALIZED MARKET-ADJUSTED PROJECTED ALLOWED TOTAL CLAIMS

Table 7 compares the normalization factors used in this filing to those used in the 2020 filing. The changes in the factors reflect small differences from the projected populations in 2020 and 2021.

D. COMPONENTS OF RATE CHANGE

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

Data in Table 9 is consistent with the 2020 and 2021 URRT with the exceptions of Risk Adjustment and Reinsurance which were revised to project company-specific values.

3. PLAN RATE DEVELOPMENT

Table 10 is populated with plan information consistent with entries in the 2021 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 2020 filing.

6. ACTUARIAL CERTIFICATION

I, [REDACTED], [REDACTED] [REDACTED] 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 2021 Rate Filing Justification.

May 19, 2020

PA Rate Template Part I
Data Relevant to the Rate Filing

Table 0. Identifying Information

Carrier Name:	CDC Insurance Company, Inc.
Product(s):	PPO
Market Segment:	Small Group
Rate Effective Date:	1/1/2021
Rate Period Start Date:	1/1/2019
Date of Most Recent Membership:	7/1/2020

to 12/31/2021
to 12/31/2019

Table 1. Number of Members

	Member-months Experience Period	Members Current Period (as of 02-01-2021)	Member-months Projected Rating Period
	25.8	25.8	25.8
Average Age	35.8	35.8	35.8
Total	827,473	75,484	955,858
<18	153,626	13,675	187,693
18-24	17,339	8,204	18,448
25-29	28,652	2,754	38,246
30-34	48,309	6,118	71,418
35-39	44,835	5,618	47,836
40-44	44,832	3,870	44,486
45-49	47,789	1,666	47,992
50-54	51,720	5,876	52,512
55-59	55,511	7,681	52,172
60-64	48,186	5,728	48,576
65+	46,217	5,028	51,168

Table 2. Experience Period Claims and Premiums

Earned Premium	Paid Claims	Ultimate Incurred Claims	Member Months	Estimated Cost Sharing (Member's Share)	Allowed Claims (Non-Capitated)	Non-ERB portion of Allowed Claims	Total Prescription Drug Rebate*	Total ERB Capitation	Total Non-ERB Capitation	Estimated Risk Adjustment	Estimated Reinsurance Recoveries
\$ 118,914,025.11	\$ 305,156,798.50	\$ 305,471,900.89	827,473	89.88, 971.34	685,855,502.21		\$ 111,376,452.22	\$ 6,813,203.28	\$ 4,745,445.17	\$1,056,459.08	\$
Experience Period Total Allowed ERB Claims + ERB Capitation (PMPM) (net of prescription drug rebates)											\$ 550.89
Loss Ratio											71.08%

*Express Prescription Drug Rebates as a negative number

Table 3. Trend Components

Service Category	Cost*	Utilization*	Induced Damage*	Composite Trend	Weight*
Inpatient Hospital	4.00%	9.00%	0.00%	14.44%	16.47%
Outpatient Hospital	4.10%	9.00%	0.00%	14.58%	21.50%
Professional	2.70%	9.00%	0.00%	13.00%	32.71%
Other Medical	2.70%	9.00%	0.00%	13.00%	0.00%
Pharmacy	0.00%	0.00%	0.00%	0.00%	8.7%
Prescription Drugs	0.00%	0.00%	7.89%	7.89%	21.45%
Total Annual Trend				13.06%	100.00%
Months of Trend				28	
Total Applied Trend Projection Factor				1.256	

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

** Should equal UBRF Trend

Table 4. Historical Experience

Month-Year	Total Annual Premium	Incurred Claims	Completion Factor*	Ultimate Incurred Claims	Members	Ultimate Incurred PMPM	Estimated Annual Cost Sharing (Member + ERB)	Prescription Drug Rebates**	Allowed Claims (Net of Prescription Drug Rebates)	Allowed PMPM
Jan-16	\$	30,917,921.81	1.000%	30,917,921.81	74,467	\$	417.14	\$	15,615,120.00	\$14.46
Feb-16	\$	30,166,054.88	1.000%	30,166,054.88	74,251	\$	413.10	\$	15,731,025.56	\$13.65
Mar-16	\$	34,451,207.66	1.000%	34,451,207.66	74,493	\$	462.46	\$	14,438,661.64	\$16.54
Apr-16	\$	31,693,954.60	1.000%	31,693,954.60	74,518	\$	425.00	\$	17,562,409.44	\$19.64
May-16	\$	31,422,885.51	1.000%	31,422,885.51	74,320	\$	408.44	\$	18,553,963.11	\$19.60
Jun-16	\$	36,772,484.34	1.000%	36,772,484.34	74,174	\$	484.46	\$	18,716,726.26	\$24.02
Jul-16	\$	30,719,702.17	1.000%	30,719,702.17	74,031	\$	414.36	\$	16,146,512.24	\$18.13
Aug-16	\$	33,638,691.97	1.000%	33,638,691.97	74,299	\$	452.56	\$	15,025,302.41	\$21.30
Sep-16	\$	34,509,731.28	1.000%	34,509,731.28	74,147	\$	432.36	\$	16,785,400.84	\$19.11
Oct-16	\$	32,411,436.36	1.000%	32,411,436.36	74,517	\$	434.18	\$	17,422,881.38	\$19.20
Nov-16	\$	34,687,449.39	1.000%	34,687,449.39	74,801	\$	463.47	\$	18,821,115.53	\$20.61
Dec-16	\$	34,597,432.56	1.000%	34,597,432.56	75,564	\$	424.34	\$	18,864,020.14	\$14.88
Jan-17	\$	31,589,749.77	1.000%	31,589,749.77	75,145	\$	420.38	\$	17,211,402.41	\$17.84
Feb-17	\$	30,189,379.68	1.000%	30,189,379.68	75,401	\$	401.24	\$	16,486,127.81	\$16.96
Mar-17	\$	36,102,567.71	1.000%	36,102,567.71	75,124	\$	486.56	\$	16,611,648.80	\$19.41
Apr-17	\$	32,108,986.71	1.000%	32,108,986.71	74,842	\$	388.36	\$	17,831,462.20	\$19.13
May-17	\$	34,343,315.77	1.000%	34,343,315.77	75,073	\$	457.47	\$	17,931,114.03	\$18.34
Jun-17	\$	31,626,439.51	1.000%	31,626,439.51	75,013	\$	406.07	\$	17,969,469.73	\$18.16
Jul-17	\$	31,367,366.76	1.000%	31,367,366.76	74,884	\$	414.86	\$	16,111,104.11	\$18.18
Aug-17	\$	32,871,958.77	1.000%	32,871,958.77	75,203	\$	437.14	\$	17,921,189.14	\$19.34
Sep-17	\$	29,975,528.71	1.000%	29,975,528.71	75,061	\$	399.35	\$	15,149,432.71	\$16.28
Oct-17	\$	31,802,728.98	1.000%	31,802,728.98	74,690	\$	450.48	\$	17,797,367.28	\$19.02
Nov-17	\$	32,256,460.68	1.000%	32,256,460.68	74,192	\$	464.70	\$	17,714,248.21	\$19.52
Dec-17	\$	30,526,716.06	1.000%	30,526,716.06	73,251	\$	416.14	\$	17,851,438.13	\$18.38
Jan-18	\$	30,756,040.35	1.000%	30,756,040.35	71,477	\$	430.20	\$	18,167,802.57	\$19.02
Feb-18	\$	29,651,374.96	1.000%	29,651,374.96	73,174	\$	406.24	\$	17,953,110.01	\$17.15
Mar-18	\$	29,248,588.66	1.000%	29,248,588.66	70,763	\$	414.86	\$	18,111,387.28	\$19.42
Apr-18	\$	29,281,845.89	1.000%	29,281,845.89	69,701	\$	420.11	\$	18,461,169.22	\$19.18
May-18	\$	31,248,832.42	1.000%	31,248,832.42	69,118	\$	451.11	\$	18,516,526.76	\$14.50
Jun-18	\$	28,111,076.02	1.000%	28,111,076.02	68,610	\$	408.00	\$	17,981,727.45	\$18.64
Jul-18	\$	28,148,189.78	1.000%	28,148,189.78	68,778	\$	414.86	\$	17,175,126.44	\$18.08
Aug-18	\$	31,750,863.77	1.000%	31,750,863.77	69,083	\$	488.00	\$	18,254,447.17	\$21.82
Sep-18	\$	28,013,157.83	1.000%	28,013,157.83	69,431	\$	403.61	\$	17,746,512.17	\$17.75
Oct-18	\$	30,312,064.06	1.000%	30,312,064.06	68,668	\$	478.44	\$	18,104,381.06	\$19.48
Nov-18	\$	32,047,070.34	1.000%	32,047,070.34	69,721	\$	459.42	\$	18,101,209.77	\$20.56
Dec-18	\$	29,406,172.89	1.000%	29,406,172.89	70,527	\$	415.77	\$	18,021,212.73	\$18.56
Jan-19	\$	32,409,524.02	0.999%	32,423,071.77	71,502	\$	455.46	\$	18,211,170.18	\$19.12
Feb-19	\$	29,881,380.61	0.999%	29,881,380.61	71,494	\$	418.77	\$	18,461,887.44	\$17.75
Mar-19	\$	32,867,143.78	0.999%	32,868,438.16	71,746	\$	450.50	\$	18,792,164.37	\$19.47
Apr-19	\$	32,572,775.39	0.998%	32,576,124.45	72,080	\$	440.82	\$	18,844,169.16	\$19.06
May-19	\$	32,355,618.05	0.997%	32,434,118.65	72,084	\$	440.26	\$	18,925,926.07	\$19.10
Jun-19	\$	28,924,777.00	0.996%	30,061,680.34	72,429	\$	414.01	\$	18,051,411.80	\$18.24
Jul-19	\$	31,316,484.41	0.991%	31,342,600.60	71,064	\$	428.06	\$	17,974,844.11	\$18.16
Aug-19	\$	32,935,101.05	0.999%	33,236,274.61	73,492	\$	452.24	\$	17,914,511.24	\$19.14
Sep-19	\$	30,721,801.52	0.981%	31,307,454.68	73,161	\$	420.36	\$	18,643,011.38	\$18.17
Oct-19	\$	30,416,908.84	0.973%	31,564,400.82	74,866	\$	456.06	\$	18,484,205.07	\$19.42
Nov-19	\$	32,161,136.14	0.969%	33,265,101.61	75,801	\$	450.70	\$	18,305,179.14	\$19.04
Dec-19	\$	31,934,020.11	0.939%	36,768,748.50	75,098	\$	480.81	\$	17,020,413.16	\$19.94

*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: QCC Insurance Company, Inc.
 Product(s): PPO
 Market Segment: Small Group
 Rate Effective Date: 1/1/2021

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

Development of the Projected Index Rate	Actual Experience Data	Manual Data
Total Allowed EHB Claims + EHB Capitation PMPM (net of prescription drug rebates) PMPM	\$ 550.90	\$ -
Two year trend projection Factor	1.256	1.000
Unadjusted Projected Allowed EHB Claims PMPM	\$ 691.82	\$ -
Single Risk Pool Adjustment Factors		
Change in Morbidity - Impact of Reinsurance Program	1.000	1.000
Change in Morbidity - All Other	1.010	
Total Non-Morbidity Changes	1.007	0.000
Change in Demographics	1.007	
Change in Network	1.000	
Change in Benefits	1.000	
Change in Other	1.000	
Total Adjusted Projected Allowed EHB Claims PMPM	\$ 703.71	\$ -
Credibility Factors	100%	0%
Blended Projected EHB Claims PMPM	\$ 703.71	\$ -
Development of the Market-Adjusted Index Rate and Total Allowed Claims		
Adjusted Projected Allowed EHB Claims PMPM	\$ 703.71	
Projected Paid to Allowed Ratio	0.730	
Projected Incurred EHB Claims PMPM	\$ 527.86	
Market-wide Adjustments		
Projected Incurred Risk Adjustment PMPM	\$ 15.65	
Projected Incurred Exchange User Fees PMPM	\$ 0.00	
Projected Incurred Reinsurance Recoveries PMPM	\$ 0.00	
Market-Adjusted Projected Incurred EHB Claims PMPM	\$ 532.30	
Market-Adjusted Projected Allowed EHB Claims PMPM	\$ 682.84	
Projected Allowed Non-EHB Claims PMPM	\$ 5.43	
Market-Adjusted Projected Incurred Total Claims PMPM	\$ 536.38	
Market-Adjusted Projected Allowed Total Claims PMPM	\$ 688.28	

Table 6. Retention

Retention Items - Express in percentages	Percentages	PMPM Amounts
Administrative Expenses	14.61%	\$91.27
General and Claims	8.45%	\$53.94
Agent/Broker Fees and Commissions	1.38%	\$84.23
Quality Improvement Initiatives	0.80%	\$5.11
Taxes and Fees	2.49%	\$15.96
Risk Adjustment User Fee	0.04%	\$0.26
PCORI Fee	0.03%	\$0.20
PA Premium & Other Taxes (if applicable)	2.00%	\$12.77
Federal Income Tax	0.42%	\$2.68
Health Insurance Providers Fee (Prorated for Small Groups only)	0.00%	\$0.00
Profit/Contingency (after tax)	2.00%	\$12.77
Total Retention	19.10%	\$121.94
Projected Required Revenue PMPM		\$ 638.32

Table 8. Components of Rate Change

Rate Components	2020	2021	Difference	Percent Change
A. Calibrated Plan Adjusted Index Rate (PMPM)	\$ 420.86	\$ 424.52	\$ 3.66	0.7%
B. Base period allowed claims before normalization	\$ 528.86	\$ 530.90	\$ 24.10	5.7%
C. Normalization factor component of change	\$ (182.92)	\$ (189.99)	\$ (6.16)	-1.3%
D. Change in Normalized Allowed Claims Adjustment Components				
D1. Base period allowed claims after normalization	\$ 343.88	\$ 361.81	\$ 17.93	4.3%
D2. URRP Trend	\$ 37.75	\$ 92.55	\$ 54.80	13.0%
D3. URRP Morbidity	\$ -	\$ 4.54	\$ 4.54	1.1%
D4. URRP Other	\$ 4.77	\$ 3.26	\$ (1.51)	-0.4%
D5. Normalized URRP Risk Adjustment on an allowed basis	\$ 11.50	\$ (13.70)	\$ (25.21)	-6.0%
D6. Normalized Exchange User Fee on an allowed basis	\$ -	\$ -	\$ -	0.0%
D7. Normalized Reinsurance Recoveries on an allowed basis	\$ -	\$ -	\$ -	0.0%
D8. Subtotal - Sum(D1-D7)	\$ 397.90	\$ 448.47	\$ 50.56	12.0%
E. Change in Allowable Plan Adjusted Level Components				
E1. Network	\$ -	\$ -	\$ -	0.0%
E2. Pricing AV	\$ (76.83)	\$ (112.00)	\$ (35.17)	-4.4%
E3. Benefit Richness	\$ 0.00	\$ 0.00	\$ 0.00	0.0%
E4. Catastrophic Eligibility	\$ -	\$ -	\$ -	0.0%
E5. Subtotal - Sum(E1-E4)	\$ (76.83)	\$ (112.00)	\$ (35.17)	-4.4%
F. Change in Retention Components				
F1. Administrative Expenses	\$ 61.66	\$ 62.03	\$ 0.37	0.1%
F2. Taxes and Fees	\$ 24.69	\$ 10.57	\$ (14.13)	-3.4%
F3. Profit and/or Contingency	\$ 8.42	\$ 8.49	\$ 0.07	0.0%
F4. Subtotal - Sum(F1-F3)	\$ 94.76	\$ 81.10	\$ (13.66)	-3.2%
G. Change in Miscellaneous Items	\$ -	\$ -	\$ -	0.0%
H. Sum of Components of Rate Change (should approximate the change shown in line A)	\$ 415.83	\$ 417.56	\$ 1.73	0.4%

For Informational Purposes only - No input required.

Blended Base Period Unadjusted Claims before Normalization	\$ 550.90	
Blended Earned Premium	\$ 518,934,029.11	
Blended Loss Ratio	75.08%	

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

Effective Date	1/1/2021	4/1/2021	7/1/2021	10/1/2021	Total Single Risk Pool
# of Member Months Renewing in Quarter	345,213	184,263	147,340	200,653	877,473
Adjusted Projected Allowed EHB Claims PMPM	\$ 703.71	\$ 703.71	\$ 703.71	\$ 703.71	\$ 703.71
Months of Trend	3	3	3	3	3
Annual Trend	12.06%	12.06%	12.06%	12.06%	12.06%
Single Risk Pool Projected Allowed Claims	\$ 703.71	\$ 704.09	\$ 704.94	\$ 706.46	\$ 709.35
Quarterly Trend Factor	1.000	1.029	1.059	1.089	1.038

Table 7. Normalized Market-Adjusted Projected Allowed Total Claims

Normalization Factors	2020	2021
Average Age Factor	\$ 1.94	\$ 1.51
Average Geographic Factor	\$ 1.06	\$ 1.06
Average Tobacco Factor	\$ 1.01	\$ 1.01
Average Benefit Richness (Induced demand)	\$ 1.00	\$ 1.00
Average Network Factor	\$ 1.00	\$ 1.00
Market Adjusted Projected Allowed Total Claims PMPM	\$ 627.23	\$ 688.28
Normalized Market-Adjusted Projected Allowed Total Claims PMPM	\$ 409.43	\$ 452.03

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

	2020	2021
Paid-to-Allowed	0.807	0.750
URRP Trend (Total Applied Trend Factor)	1.110	1.236
URRP Morbidity	1.000	1.010
URRP "Other"	1.013	1.007
Risk Adjustment	\$ 14.22	\$ (15.65)
Exchange User Fee	\$ -	\$ -
Reinsurance Recoveries	\$ -	\$ -
Capitation	\$ -	\$ -
Network	1.000	1.000
Pricing AV	0.807	0.750
Benefit Richness	1.000	1.000
Catastrophic Eligibility	1.000	1.000
Administrative Expenses	14.61%	14.61%
Taxes and Fees	2.49%	2.49%
Profit and/or Contingency	2.00%	2.00%

PA Rate Template Part III
Table 10. Plan Rates

Carrier Name:	OCC Insurance Company, Inc.
Product(s):	PPO
Market Segment:	Small Group
Rate Effective Date:	1/1/2021
Base Period Start Date:	1/1/2019
Date of Most Recent Membership:	2/1/2020
Market Adjusted Index Rate:	\$ 682.84

Calibration	
Age Calibration Factor	1.51
Geographic Calibration Factor	1.00
Tobacco Calibration Factor	1.00
Aggregate Calibration Factor	1.51

Total Covered Lives @ 02-01-2020	75,484
----------------------------------	--------

[illegible]

PA Rate Quarterly Template Part V Consumer Factors

Carrier Name:	QCC Insurance Company, Inc.
Product(s):	PPO
Market Segment:	Small Group
Rate Effective Date:	1/1/2021

Table 12. Age and Tobacco Factors

Age Band	Age Factor	Tobacco Factor		Age Band	Age Factor	Tobacco Factor
0-14	0.765			40	1.278	1.225
15	0.833			41	1.302	1.225
16	0.859			42	1.325	1.225
17	0.885			43	1.357	1.225
18	0.913			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.

Table 13. Geographic Factors

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

Table 14. Network Factors

[illegible]

QCC Insurance Company
Small Group
Plan Design Summary

HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
31609PA0150025	Personal Choice PPO Platinum Preferred \$10/\$20/\$	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150026	Personal Choice PPO Platinum Preferred \$20/\$40/\$	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150027	Personal Choice PPO Gold Preferred \$40/\$80/\$600	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150028	Personal Choice PPO Gold Classic \$1,500/\$20/\$40/\$	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150029	Personal Choice PPO Silver Classic \$3,750/\$30/\$60/	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150030	Personal Choice PPO Platinum HSA-50 \$1,800/100%	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150031	Personal Choice PPO Gold HSA-25 \$2,400/\$25/\$50/	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150032	Personal Choice PPO Gold HSA-0 \$2,100/100%	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150034	Personal Choice PPO Silver HSA-0 \$2,100/70%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150035	Personal Choice PPO Silver HSA-0 \$3,000/90%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150036	Personal Choice PPO Bronze HSA-0 \$5,600/50%	PPO	Bronze	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150037	Personal Choice PPO Bronze HSA-0 \$7,000/100%	PPO	Bronze	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150039	Personal Choice PPO Gold HRA-20 \$3,700/100%	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150047	Personal Choice PPO Gold Classic \$2,500 \$40/\$80/1	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150048	Personal Choice PPO Silver Classic \$5,000/\$50/\$100	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150049	Personal Choice PPO Silver Secure \$4,750/\$40/\$80/	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150050	Personal Choice PPO Silver HSA-0 \$3,700/100%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0170001	Personal Choice EPO Silver HSA-0 \$3,000/80%	EPO	Silver	Off	EPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia

Company Name:	QCC Insurance Company
Market:	Small Group
Product:	PPO
Effective Date of Rates:	April 1, 2021

Ending date of Rate:

June 30

[illegible]

**QCC Insurance Company
Small Group
Plan Design Summary**

HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
31609PA0150025	Personal Choice PPO Platinum Preferred \$10/\$20/\$	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150026	Personal Choice PPO Platinum Preferred \$20/\$40/\$	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150027	Personal Choice PPO Gold Preferred \$40/\$80/\$600	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150028	Personal Choice PPO Gold Classic \$1,500/\$20/\$40/\$	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150029	Personal Choice PPO Silver Classic \$3,750/\$30/\$60/	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150030	Personal Choice PPO Platinum HSA-50 \$1,800/100%	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150031	Personal Choice PPO Gold HSA-25 \$2,400/\$25/\$50/	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150032	Personal Choice PPO Gold HSA-0 \$2,100/100%	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150034	Personal Choice PPO Silver HSA-0 \$2,100/70%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150035	Personal Choice PPO Silver HSA-0 \$3,000/90%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150036	Personal Choice PPO Bronze HSA-0 \$5,600/50%	PPO	Bronze	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150037	Personal Choice PPO Bronze HSA-0 \$7,000/100%	PPO	Bronze	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150039	Personal Choice PPO Gold HRA-20 \$3,700/100%	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150047	Personal Choice PPO Gold Classic \$2,500 \$40/\$80/1	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150048	Personal Choice PPO Silver Classic \$5,000/\$50/\$100	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150049	Personal Choice PPO Silver Secure \$4,750/\$40/\$80/	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150050	Personal Choice PPO Silver HSA-0 \$3,700/100%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0170001	Personal Choice EPO Silver HSA-0 \$3,000/80%	EPO	Silver	Off	EPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia

Company Name QCC Insurance Company
Market Small Group
RATES FOR AGE 21, NON-TOBACCO USER, BY RATING AREA AND COUNTY

[illegible]

Ending date of Rates:

**QCC Insurance Company
Small Group
Plan Design Summary**

HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
31609PA0150025	Personal Choice PPO Platinum Preferred \$10/\$20/\$	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150026	Personal Choice PPO Platinum Preferred \$20/\$40/\$	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150027	Personal Choice PPO Gold Preferred \$40/\$80/\$600	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150028	Personal Choice PPO Gold Classic \$1,500/\$20/\$40/\$	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150029	Personal Choice PPO Silver Classic \$3,750/\$30/\$60/	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150030	Personal Choice PPO Platinum HSA-50 \$1,800/100%	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150031	Personal Choice PPO Gold HSA-25 \$2,400/\$25/\$50/	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150032	Personal Choice PPO Gold HSA-0 \$2,100/100%	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150034	Personal Choice PPO Silver HSA-0 \$2,100/70%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150035	Personal Choice PPO Silver HSA-0 \$3,000/90%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150036	Personal Choice PPO Bronze HSA-0 \$5,600/50%	PPO	Bronze	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150037	Personal Choice PPO Bronze HSA-0 \$7,000/100%	PPO	Bronze	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150039	Personal Choice PPO Gold HRA-20 \$3,700/100%	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150047	Personal Choice PPO Gold Classic \$2,500 \$40/\$80/1	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150048	Personal Choice PPO Silver Classic \$5,000/\$50/\$100	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150049	Personal Choice PPO Silver Secure \$4,750/\$40/\$80/	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150050	Personal Choice PPO Silver HSA-0 \$3,700/100%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0170001	Personal Choice EPO Silver HSA-0 \$3,000/80%	EPO	Silver	Off	EPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia

Company Name: QFC Insurance Company		Market: Small Group	
Product: POS		Effective Date of Rates: October 1, 2021	
End date of Rates: December 31, 2021			
HMO Plan ID (On Exchange)	310000000000	310000000000	310000000000
HMO Plan ID (Off Exchange)	310000000000	310000000000	310000000000
Plan Name/Network	Choice PPO Gold Preferred 50/50	Choice PPO Gold Preferred 50/50	Choice PPO Gold Preferred 50/50
Form #	10884-BC-SG OFF Rev. 1.21	10884-BC-SG OFF Rev. 1.21	10884-BC-SG OFF Rev. 1.21
Rating Area	Personal Choice Network	Personal Choice Network	Personal Choice Network
Network	Personal Choice Network	Personal Choice Network	Personal Choice Network
Platform	Platform	Platform	Platform
Contract	Contract	Contract	Contract
Class	Class	Class	Class
Category	Category	Category	Category
OP Maximum (Yr/Net)	OP Maximum (Yr/Net)	OP Maximum (Yr/Net)	OP Maximum (Yr/Net)
Pediatric (Net/Yr/Net)	Pediatric (Net/Yr/Net)	Pediatric (Net/Yr/Net)	Pediatric (Net/Yr/Net)
Age Band	Non-Tobacco	Tobacco	Non-Tobacco
0-14	5445.32	5445.32	5445.32
15	5556.38	5556.38	5556.38
16	5522.50	5522.50	5522.50
17	5538.31	5538.31	5538.31
18	5555.34	5555.34	5555.34
19	5572.37	5572.37	5572.37
20	5590.31	5590.31	5590.31
21	5608.26	5608.26	5608.26
22	5626.21	5626.21	5626.21
23	5644.16	5644.16	5644.16
24	5662.11	5662.11	5662.11
25	5680.06	5680.06	5680.06
26	5697.99	5697.99	5697.99
27	5715.92	5715.92	5715.92
28	5733.85	5733.85	5733.85
29	5751.78	5751.78	5751.78
30	5769.71	5769.71	5769.71
31	5787.64	5787.64	5787.64
32	5805.57	5805.57	5805.57
33	5823.50	5823.50	5823.50
34	5841.43	5841.43	5841.43
35	5859.36	5859.36	5859.36
36	5877.29	5877.29	5877.29
37	5895.22	5895.22	5895.22
38	5913.15	5913.15	5913.15
39	5931.08	5931.08	5931.08
40	5949.01	5949.01	5949.01
41	5966.94	5966.94	5966.94
42	5984.87	5984.87	5984.87
43	6002.80	6002.80	6002.80
44	6020.73	6020.73	6020.73
45	6038.66	6038.66	6038.66
46	6056.59	6056.59	6056.59
47	6074.52	6074.52	6074.52
48	6092.45	6092.45	6092.45
49	6110.38	6110.38	6110.38
50	6128.31	6128.31	6128.31
51	6146.24	6146.24	6146.24
52	6164.17	6164.17	6164.17
53	6182.10	6182.10	6182.10
54	6200.03	6200.03	6200.03
55	6217.96	6217.96	6217.96
56	6235.89	6235.89	6235.89
57	6253.82	6253.82	6253.82
58	6271.75	6271.75	6271.75
59	6289.68	6289.68	6289.68
60	6307.61	6307.61	6307.61
61	6325.54	6325.54	6325.54
62	6343.47	6343.47	6343.47
63	6361.40	6361.40	6361.40
64	6379.33	6379.33	6379.33

**QCC Insurance Company
Small Group
Plan Design Summary**

HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange	Network	Rating Area	Counties Covered
31609PA0150025	Personal Choice PPO Platinum Preferred \$10/\$20/\$	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150026	Personal Choice PPO Platinum Preferred \$20/\$40/\$	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150027	Personal Choice PPO Gold Preferred \$40/\$80/\$600	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150028	Personal Choice PPO Gold Classic \$1,500/\$20/\$40/\$	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150029	Personal Choice PPO Silver Classic \$3,750/\$30/\$60/	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150030	Personal Choice PPO Platinum HSA-50 \$1,800/100%	PPO	Platinum	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150031	Personal Choice PPO Gold HSA-25 \$2,400/\$25/\$50/	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150032	Personal Choice PPO Gold HSA-0 \$2,100/100%	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150034	Personal Choice PPO Silver HSA-0 \$2,100/70%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150035	Personal Choice PPO Silver HSA-0 \$3,000/90%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150036	Personal Choice PPO Bronze HSA-0 \$5,600/50%	PPO	Bronze	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150037	Personal Choice PPO Bronze HSA-0 \$7,000/100%	PPO	Bronze	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150039	Personal Choice PPO Gold HRA-20 \$3,700/100%	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150047	Personal Choice PPO Gold Classic \$2,500 \$40/\$80/1	PPO	Gold	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150048	Personal Choice PPO Silver Classic \$5,000/\$50/\$100	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150049	Personal Choice PPO Silver Secure \$4,750/\$40/\$80/	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0150050	Personal Choice PPO Silver HSA-0 \$3,700/100%	PPO	Silver	Off	PPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia
31609PA0170001	Personal Choice EPO Silver HSA-0 \$3,000/80%	EPO	Silver	Off	EPO	8	Bucks, Chester, Delaware, Montgomery, Philadelphia

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T		
1	Unified Rate Review v5.1										To add a product to Worksheet 2 - Plan Product Info, select the Add Product button or Ctrl + Shift + P.											
2											To add a plan to Worksheet 2 - Plan Product Info, select the Add Plan button or Ctrl + Shift + L.											
3	Company Legal Name:		QCC Insurance Company, Inc.										State:		PA		To validate, select the Validate button or Ctrl + Shift + I.					
4	HIOS Issuer ID:		31609										Market:		Small Group		To finalize, select the Finalize button or Ctrl + Shift + F.					
5	Effective Date of Rate Change(s):		1/1/2021																			
6																						
7																						
8	Market Level Calculations (Same for all Plans)																					
9																						
10																						
11	Section I: Experience Period Data																					
12	Experience Period:		1/1/2019		to		12/31/2019															
13					Total		PMPM															
14	Allowed Claims				\$483,398,548.96				\$550.90													
15	Reinsurance				\$0.00				\$0.00													
16	Incurred Claims in Experience Period				\$393,416,577.62				\$448.35													
17	Risk Adjustment				\$11,406,409.08				\$13.00													
18	Experience Period Premium				\$518,934,029.11				\$591.40													
19	Experience Period Member Months				877,473																	
20																						
21	Section II: Projections																					
22																						
23	Benefit Category		Experience Period Index Rate PMPM		Year 1 Trend			Year 2 Trend			Trended EHB Allowed Claims PMPM											
24	Inpatient Hospital		\$90.71		1.041 1.100			1.041 1.100														
25	Outpatient Hospital		\$129.47		1.042 1.100			1.042 1.100														
26	Professional		\$180.20		1.028 1.100			1.028 1.100														
27	Other Medical		\$0.00		1.028 1.100			1.028 1.100														
28	Capitation		\$10.31		0.976 1.000			0.976 1.000														
29	Prescription Drug		\$140.21		0.979 1.100			0.979 1.100														
30	Total		\$550.90																			
31																						
32	Morbidity Adjustment							1.010														
33	Demographic Shift							1.007														
34	Plan Design Changes							1.000														
35	Other							1.000														
36	Adjusted Trended EHB Allowed Claims PMPM for		1/1/2021					\$703.70														
37																						
38	Manual EHB Allowed Claims PMPM							\$0.00														
39	Applied Credibility %							100.00%														
40																						
41	Projected Period Totals																					
42	Projected Index Rate for		1/1/2021					\$703.70			\$637,417,089.60											
43	Reinsurance							\$0.00			\$0.00											
44	Risk Adjustment Payment/Charge							\$20.86			\$18,895,154.88											
45	Exchange User Fees							0.00%			\$0.00											
46	Market Adjusted Index Rate							\$682.84			\$618,521,934.72											
47																						
48	Projected Member Months							905,808														
49																						
50	Information Not Releasable to the Public Unless Authorized by Law: This information has not been publically disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.																					
51																						

Product-Plan Data Collection

Company Legal Name:	QCC Insurance Company, Inc.
HIOS Issuer ID:	31609
Effective Date of Rate Change(s):	1/1/2021

State: PA
Market: Small Group

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

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

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

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

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

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

Product/Plan Level Calculations

Field # Section I: General Product and Plan Information

[illegible]

Section II: Experience Period and Current Plan Level Information

2.1. Aligned ID (Standard Component ID)	Total	31609P0100000	31609P0100001	31609P0100002	31609P0100003	31609P0100004	31609P0100005	31609P0100006	31609P0100007	31609P0100008	31609P0100009	31609P0100010	31609P0100011	31609P0100012	31609P0100013	31609P0100014	31609P0100015	31609P0100016	31609P0100017	31609P0100018	31609P0100019	31609P0100020	31609P0100021	31609P0100022	31609P0100023	31609P0100024	31609P0100025	31609P0100026	31609P0100027	31609P0100028	31609P0100029	31609P0100030	31609P0100031	31609P0100032	31609P0100033	31609P0100034	31609P0100035	31609P0100036	31609P0100037	31609P0100038	31609P0100039	31609P0100040	31609P0100041	31609P0100042	31609P0100043	31609P0100044	31609P0100045	31609P0100046	31609P0100047	31609P0100048	31609P0100049	31609P0100050	31609P0100051	31609P0100052	31609P0100053	31609P0100054	31609P0100055	31609P0100056	31609P0100057	31609P0100058	31609P0100059	31609P0100060	31609P0100061	31609P0100062	31609P0100063	31609P0100064	31609P0100065	31609P0100066	31609P0100067	31609P0100068	31609P0100069	31609P0100070	31609P0100071	31609P0100072	31609P0100073	31609P0100074	31609P0100075	31609P0100076	31609P0100077	31609P0100078	31609P0100079	31609P0100080	31609P0100081	31609P0100082	31609P0100083	31609P0100084	31609P0100085	31609P0100086	31609P0100087	31609P0100088	31609P0100089	31609P0100090	31609P0100091	31609P0100092	31609P0100093	31609P0100094	31609P0100095	31609P0100096	31609P0100097	31609P0100098	31609P0100099	31609P0100100	31609P0100101	31609P0100102	31609P0100103	31609P0100104	31609P0100105	31609P0100106	31609P0100107	31609P0100108	31609P0100109	31609P0100110	31609P0100111	31609P0100112	31609P0100113	31609P0100114	31609P0100115	31609P0100116	31609P0100117	31609P0100118	31609P0100119	31609P0100120	31609P0100121	31609P0100122	31609P0100123	31609P0100124	31609P0100125	31609P0100126	31609P0100127	31609P0100128	31609P0100129	31609P0100130	31609P0100131	31609P0100132	31609P0100133	31609P0100134	31609P0100135	31609P0100136	31609P0100137	31609P0100138	31609P0100139	31609P0100140	31609P0100141	31609P0100142	31609P0100143	31609P0100144	31609P0100145	31609P0100146	31609P0100147	31609P0100148	31609P0100149	31609P0100150	31609P0100151	31609P0100152	31609P0100153	31609P0100154	31609P0100155	31609P0100156	31609P0100157	31609P0100158	31609P0100159	31609P0100160	31609P0100161	31609P0100162	31609P0100163	31609P0100164	31609P0100165	31609P0100166	31609P0100167	31609P0100168	31609P0100169	31609P0100170	31609P0100171	31609P0100172	31609P0100173	31609P0100174	31609P0100175	31609P0100176	31609P0100177	31609P0100178	31609P0100179	31609P0100180	31609P0100181	31609P0100182	31609P0100183	31609P0100184	31609P0100185	31609P0100186	31609P0100187	31609P0100188	31609P0100189	31609P0100190	31609P0100191	31609P0100192	31609P0100193	31609P0100194	31609P0100195	31609P0100196	31609P0100197	31609P0100198	31609P0100199	31609P0100200	31609P0100201	31609P0100202	31609P0100203	31609P0100204	31609P0100205	31609P0100206	31609P0100207	31609P0100208	31609P0100209	31609P0100210	31609P0100211	31609P0100212	31609P0100213	31609P0100214	31609P0100215	31609P0100216	31609P0100217	31609P0100218	31609P0100219	31609P0100220	31609P0100221	31609P0100222	31609P0100223	31609P0100224	31609P01002
---	-------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	---------------	-------------

Section III: Plan Adjustment Factors

3.1 Market ID (Random Component ID)	31609PA0010001	31609PA0010002	31609PA0010003	31609PA0010004	31609PA0010005	31609PA0010006	31609PA0010007	31609PA0010008	31609PA0010009	31609PA0010010	31609PA0010011	31609PA0010012	31609PA0010013	31609PA0010014	31609PA0010015	31609PA0010016	31609PA0010017	31609PA0010018	31609PA0010019	31609PA0010020
3.1.1 Market Adjusted Index Rate																				
3.1.2 Plan Adjusted Index Rate	1.0036	0.9808	0.7881	0.7717	0.8332	0.8824	0.7351	0.8550	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
3.1.3 AV and Cost Shaving Demand of Plan																				
3.1.4 Provider Network Adjustment	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.9500
3.1.5 Benefits in Addition to EHR	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.0000
Administraive Costs																				
3.1.6 Administration Expense	14.61%	14.61%	14.61%	14.61%	14.61%	14.61%	14.61%	14.61%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3.7 Taxes and Fees	2.49%	2.49%	2.49%	2.49%	2.49%	2.49%	2.49%	2.49%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3.8 Profit & Risk Load	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3.9 Catastrophe Adjustment	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
3.10 Plan Adjusted Index Rate	\$883.02	\$840.56	\$671.99	\$658.08	\$738.20	\$752.39	\$626.80	\$729.80	\$0.00	\$535.65	\$588.94	\$401.95	\$413.58	\$652.55	\$651.44	\$461.21	\$475.30	\$587.92	\$884.29	\$884.29
3.1.1 Age Calibration Factor																				
3.1.2 Geographic Calibration Factor	0.6609																			
3.1.3 Tobacco Calibration Factor	1.0000																			
3.1.4 Calibrated Plan Adjusted Index Rate	0.9937																			
3.1.5 Tobacco Calibration Factor	\$579.91	\$552.03	\$441.32	\$432.14	\$351.46	\$494.12	\$411.64	\$479.29	\$0.00	\$351.78	\$386.78	\$263.97	\$284.75	\$428.55	\$437.82	\$302.80	\$312.10	\$386.11	\$324.94	\$324.94

Section IV: Projected Plan Level Information

4. Planned (Standard Component ID)	2016		2017		2018		2019		2020		2021		2022		2023		2024		2025		2026		2027		2028		2029		2030		2031		2032		2033		2034		2035		2036		2037		2038		2039		2040		2041		2042		2043		2044		2045		2046		2047		2048		2049		2050		2051		2052		2053		2054		2055		2056		2057		2058		2059		2060		2061		2062		2063		2064		2065		2066		2067		2068		2069		2070		2071		2072		2073		2074		2075		2076		2077		2078		2079		2080		2081		2082		2083		2084		2085		2086		2087		2088		2089		2090		2091		2092		2093		2094		2095		2096		2097		2098		2099		2100		2101		2102		2103		2104		2105		2106		2107		2108		2109		2110		2111		2112		2113		2114		2115		2116		2117		2118		2119		2120		2121		2122		2123		2124		2125		2126		2127		2128		2129		2130		2131		2132		2133		2134		2135		2136		2137		2138		2139		2140		2141		2142		2143		2144		2145		2146		2147		2148		2149		2150		2151		2152		2153		2154		2155		2156		2157		2158		2159		2160		2161		2162		2163		2164		2165		2166		2167		2168		2169		2170		2171		2172		2173		2174		2175		2176		2177		2178		2179		2180		2181		2182		2183		2184		2185		2186		2187		2188		2189		2190		2191		2192		2193		2194		2195		2196		2197		2198		2199		2200		2201		2202		2203		2204		2205		2206		2207		2208		2209		2210		2211		2212		2213		2214		2215		2216		2217		2218		2219		2220		2221		2222		2223		2224		2225		2226		2227		2228		2229		2230		2231		2232		2233		2234		2235		2236		2237		2238		2239		2240		2241		2242		2243		2244		2245		2246		2247		2248		2249		2250		2251		2252		2253		2254		2255		2256		2257		2258		2259		2260		2261		2262		2263		2264		2265		2266		2267		2268		2269		2270		2271		2272		2273		2274		2275		2276		2277		2278		2279		2280		2281		2282		2283		2284		2285		2286		2287		2288		2289		2290		2291		2292		2293		2294		2295		2296		2297		2298		2299		2300		2301		2302		2303		2304		2305		2306		2307		2308		2309		2310		2311		2312		2313		2314		2315		2316		2317		2318		2319		2320		2321		2322		2323		2324		2325		2326		2327		2328		2329		2330		2331		2332		2333		2334		2335		2336		2337		2338		2339		2340		2341		2342		2343		2344		2345		2346		2347		2348		2349		2350		2351		2352		2353		2354		2355		2356		2357		2358		2359		2360		2361		2362		2363		2364		2365		2366		2367		2368		2369		2370		2371		2372		2373		2374		2375		2376		2377		2378		2379		2380		2381		2382		2383		2384		2385		2386		2387		2388		2389		2390		2391		2392		2393		2394		2395		2396		2397		2398		2399		2400		2401		2402		2403		2404		2405		2406		2407		2408		2409		2410		2411		2412		2413		2414		2415		2416		2417		2418		2419		2420		2421		2422		2423		2424		2425		2426		2427		2428		2429		2430		2431		2432		2433		2434		2435		2436		2437		2438		2439		2440		2441		2442		2443		2444		2445		2446		2447		2448		2449		2450		2451		2452		2453		2454		2455		2456		2457		2458		2459		2460		2461		2462		2463		2464		2465		2466		2467		2468		2469		2470		2471		2472		2473		2474		2475		2476		2477		2478		2479		2480		2481		2482		2483		2484		2485		2486		2487		2488		2489		2490		2491		2492		2493		2494		2495		2496		2497		2498		2499		2500		2501		2502		2503		2504		2505		2506		2507		2508		2509		2510		2511		2512		2513		2514		2515		2516		2517		2518		2519		2520		2521		2522		2523		2524		2525		2526		2527		2528		2529		2530		2531		2532		2533		2534		2535		2536		2537		2538		2539		2540		2541		2542		2543		2544		2545		2546		2547		2548		2549		2550		2551		2552		2553		2554		2555		2556		2557		2558		2559		2560		2561		2562		2563		2564		2565		2566		2567		2568		2569		2570		2571		2572		2573		2574		2575		2576		2577		2578		2579		2580		2581		2582		2583		2584		2585		2586		2587		2588		2589		2590		2591		2592		2593		2594		2595		2596		2597		2598		2599		2600		2601		2602		2603		2604		2605		2606		2607		2608		2609		2610		2611		2612		2613		2614		2615		2616		2617		2618		2619		2620		2621		2622		2623		2624		2625		2626		2627		2628		2629		2630		2631		2632		2633		2634		2635		2636		2637		2638		2639		2640		2641		2642		2643		2644		2645		2646		2647		2648		2649		2650		2651		2652		2653		2654		2655		2656		2657		2658		2659		2660		2661		2662		2663		2664		2665		2666		2667		2668		2669		2670		2671		2672		2673		2674		2675		2676		2677		2678		2679		2680		2681		2682		2683		2684		2685		2686		2687		2688		2689		2690		2691		2692		2693		2694		2695		2696		2697		2698		2699		2700		2701		2702		2703		2704		2705		2706		2707		2708		2709		2710		2711		2712		2713		2714		2715		2716		2717		2718		2719		2720		2721		2722		2723		2724		2725		2726		2727		2728		2729		2730		2731		2732		2733		2734		2735		2736		2737		2738		2739		2740		2741		2742		2743		2744		2745		2746		2747		2748		2749		2750		2751		2752		2753		2754		2755		2756		2757		2758		2759		2760		2761		2762		2763		2764		2765		2766		2767		2768		2769		2770		2771		2772		2773		2774		2775		2776		2777		2778		2779		2780		2781		2782		2783		2784		2785		2786		2787		2788		2789		2790		2791		2792		2793		2794		2795		2796		2797		2798		2799		2800		2801		2802		2803		2804		2805		2806		2807		2808		2809		2810		2811		2812		2813		2814		2815		2816		2817		2818		2819		2820		2821		2822		2823		2824		2825		2826		2827		2828		2829		2830		2831		2832		2833		2834		2835		2836		2837		2838		2839		2840		2841		2842		2843		2844		2845		2846		2847		2848		2849		2850		2851		2852		2853		2854		2855		2856		2857		2858		2859		2860		2861		2862		2863		2864		2865		2866		2867		2868		2869		2870		2871		2872		2873		2874		2875		2876		2877		2878		2879		2880		2881		2882		2883		2884		2885		2886		2887		2888		2889		2890		2891		2892		2893		2894		2895		2896		2897		2898		2899		2900		2901		2902		2903		2904		2905		2906		2907		2908		2909		2910		2911		2912		2913		2914		2915		2916		2917		2918		2919		2920		2921		2922		2923		2924		2925		2926		2927		2928		2929		2930		2931		2932		2933		2934		2935		2936		2937		2938		2939		2940		2941		2942		2943		2944		2945		2946		2947		2948		2949		2950		2951		2952		2953		2954		2955		2956		2957		2958		2959		2960		2961		2962		2963		2964		2965		2966		2967		2968		2969		2970		2971		2972		2973		2974		2975		2976		2977		2978		2979		2980		2981		2982		2983		2984		2985		2986		2987		2988		2989		2990		2991		2992		2993		2994		2995		2996		2997		2998		2999		3000	
	4.1. Allowed Cuts	\$624.475	\$66.972	\$60.900	\$131.186	\$131.835	\$69.149	\$73.626	\$95.108	\$87.767	\$166.860	\$71.433	\$126.258	\$61.743	\$70.864	\$65.455	\$104.047	\$15.293	\$24.324	\$26.467	\$47.044	\$26.569	\$50.973	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.000	\$50.0																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	

Rating Area Data Collection

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

Rating Area	Rating Factor
Rating Area 8	1.0000

URRT Part II – Consumer Friendly Justification

Scope and Range of the Rate Increase:

QCC Insurance Company ("QCC") is revising premium rates for the Pennsylvania Small Group ACA compliant products, effective from January 1, 2021. The proposed revisions to each plan are shown on the second page of this exhibit.

About 75,000 members will be affected.

Financial Experience of the Product:

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

Changes in Taxes and Fees:

The Federal government ended the Health Insurance Providers Fee beginning with premiums due in 2021. This lowers 2021 premium rates by about 3.4%.

Changes in Medical Service Costs:

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

We are projecting that claims will increase by 8.9% in 2021. Nearly half of the change in health care service costs is driven by changes to health care provider fees.

We project an additional 1% increase in claims to account for the impact of COVID-19 on overall projected claims.

Changes in Benefits:

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

Administrative Costs:

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

URRT Part II – Consumer Friendly Justification

HIOS ID	Plan Name	1Q % Change	2Q % Change	3Q % Change	4Q % Change
31609PA0150025	Personal Choice PPO Platinum Preferred \$10/\$20/\$200	1.0%	5.5%	6.4%	7.4%
31609PA0150026	Personal Choice PPO Platinum Preferred \$20/\$40/\$250	1.0%	5.5%	6.4%	7.4%
31609PA0150027	Personal Choice PPO Gold Preferred \$40/\$80/\$600	1.1%	5.6%	6.5%	7.5%
31609PA0150028	Personal Choice PPO Gold Classic \$1,500/\$20/\$40/80%	0.8%	5.3%	6.2%	7.2%
31609PA0150029	Personal Choice PPO Silver Classic \$3,750/\$30/\$60/70%	0.9%	5.4%	6.4%	7.3%
31609PA0150030	Personal Choice PPO Platinum HSA-50 \$1,800/100%	1.4%	5.8%	6.8%	7.8%
31609PA0150031	Personal Choice PPO Gold HSA-25 \$2,400/\$25/\$50/90%	1.3%	5.8%	6.7%	7.7%
31609PA0150032	Personal Choice PPO Gold HSA-0 \$2,100/100%	1.4%	5.8%	6.8%	7.8%
31609PA0150034	Personal Choice PPO Silver HSA-0 \$2,100/70%	1.2%	5.7%	6.6%	7.6%
31609PA0150035	Personal Choice PPO Silver HSA-0 \$3,000/90%	1.1%	5.5%	6.5%	7.5%
31609PA0150036	Personal Choice PPO Bronze HSA-0 \$5,600/50%	0.8%	5.3%	6.2%	7.2%
31609PA0150037	Personal Choice PPO Bronze HSA-0 \$7,000/100%	1.0%	5.4%	6.4%	7.4%
31609PA0150039	Personal Choice PPO Gold HRA-20 \$3,700/100%	-0.2%	4.2%	5.2%	6.2%
31609PA0150047	Personal Choice PPO Gold Classic \$2,500 \$40/\$80/100%	-0.1%	4.3%	5.3%	6.3%
31609PA0150048	Personal Choice PPO Silver Classic \$5,000/\$50/\$100/90%	0.3%	4.7%	5.7%	6.7%
31609PA0150049	Personal Choice PPO Silver Secure \$4,750/\$40/\$80/\$600	0.6%	5.0%	6.0%	7.0%
31609PA0150050	Personal Choice PPO Silver HSA-0 \$3,700/100%	0.3%	4.7%	5.7%	6.6%
31609PA0170001	Personal Choice EPO Silver HSA-0 \$3,000/80%	1.2%	5.6%	6.6%	7.6%

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 QCC Insurance Company, Inc. 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: QCC Insurance Company, Inc. ("QCC")

State: Pennsylvania

HIOS Issuer ID (5-digit): 31609

Market: Small Group

Effective Date(s): 1/1/2021-3/31/2021, 4/1/2021 – 6/30/2021, 7/1/2021 – 9/30/2021,
10/1/2021 – 12/31/2021

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.

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 2019 to calendar year 2021 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. This lowers 2021 premium rates.

We are projecting that claims will increase by 8.9% in 2021. Nearly 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 QCC plans based on projected membership, inclusive of the impact of benefit and cost sharing changes, is 0.9%. The minimum increase is -0.2% and the maximum increase is 7.8%.

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 QCC 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 2019 and paid through February 2020. Earned premiums and member months are for January through December 2019. The data are for all direct-written small group business of 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 2019 through December 2019 and paid through February 2020 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 2019 period. Capitation amounts are also sourced from the internal data warehouse for the January through December 2019 period but they are not adjusted for IBNR.

Allowed Claims

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

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

IBNR Development

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

The completion factors are developed annually in the 2Q – 3Q period. We do not believe our IBNR is unusually high or unusually low for incurred 2019 paid through February 2020.

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 2019 through December 2019 is projected to the future rating period by several factors.

Morbidity Adjustment

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

COVID-19 Impact

Morbidity was increased by an additional 1% to account for the impact of COVID-19 on overall projected claims.

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 1.6% 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 2019 risk transfer results.

MARKET ADJUSTED INDEX RATE

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

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

WORKSHEET 2: PRODUCT-PLAN DATA COLLECTION

SECTION I: GENERAL PRODUCT AND PLAN INFORMATION

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

AV METAL VALUES

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

SECTION II: EXPERIENCE PERIOD AND CURRENT PLAN LEVEL INFORMATION

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

SECTION III: PLAN ADJUSTMENT FACTORS

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

PLAN ADJUSTED INDEX RATE

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

NON-BENEFIT EXPENSES AND PROFIT & RISK

Administrative Expense Load

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

Profit & Risk Load/Contribution to Surplus

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

Taxes and Fees

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

CALIBRATION

The plan adjusted index rate is projected for all products using the same anticipated age distribution and the mandated age curve. Therefore the consumer adjusted premium rate is the plan adjusted index rate divided by the average age, geographic and tobacco factors for the expected distribution. The average age of the combined small group risk pool population is 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 restrictions required in the URRT Part 1.

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

MEMBERSHIP PROJECTIONS

Enrollment is projected based on current and anticipated enrollment by plan. Items impacting these projections include changes in the size of the market due to guarantee issue requirements and the individual mandate changes. The enrollment is our February 2020 enrollment.

LOSS RATIO

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

INDEX RATE

The Index Rate is defined as the EHB portion of projected allowed claims divided by all projected single risk pool lives. The Index Rate is the same value for all non-grandfathered plans for QCC Small Group Plans in Pennsylvania. The Index Rate reflects the twelve month projection for calendar year 2021. It has been developed following the specifications of 45 CFR § 156.80(d)(1).

TERMINATED PLANS

The following plan is being terminated during 2021:

31609PA0150033 Personal Choice PPO Gold HSA-25 \$2,600/80%

WORKSHEET 3: RATING AREAS

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

ACTUARIAL CERTIFICATION

I, [REDACTED], [REDACTED] 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.

[REDACTED]
May 19, 2020

[illegible]

Year	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099
1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	

Project Information		Financial Summary		Operational Data	
Project Name	Project ID	Budget (USD)	Actual (USD)	Units Produced	Quality Score
Project Alpha	PA-001	1000000	980000	1000	95
	PA-002	1200000	1150000	1200	92
	PA-003	800000	780000	800	98
	PA-004	1500000	1450000	1500	90
	PA-005	900000	890000	900	96
	PA-006	1100000	1080000	1100	93
	PA-007	1300000	1280000	1300	91
	PA-008	700000	690000	700	97
	PA-009	1400000	1380000	1400	89
	PA-010	1600000	1550000	1600	88
Project Beta	PB-001	1100000	1080000	1100	94
	PB-002	1300000	1250000	1300	91
	PB-003	900000	880000	900	96
	PB-004	1500000	1450000	1500	90
	PB-005	800000	790000	800	97
	PB-006	1200000	1180000	1200	93
	PB-007	1400000	1380000	1400	92
	PB-008	700000	690000	700	98
	PB-009	1600000	1550000	1600	89
	PB-010	1800000	1750000	1800	87
Project Gamma	PG-001	1200000	1180000	1200	93
	PG-002	1400000	1350000	1400	90
	PG-003	1000000	980000	1000	96
	PG-004	1600000	1550000	1600	89
	PG-005	900000	890000	900	97
	PG-006	1300000	1280000	1300	92
	PG-007	1500000	1450000	1500	91
	PG-008	800000	790000	800	98
	PG-009	1700000	1650000	1700	88
	PG-010	1900000	1850000	1900	86
Project Delta	PD-001	1300000	1280000	1300	92
	PD-002	1500000	1450000	1500	89
	PD-003	1100000	1080000	1100	94
	PD-004	1700000	1650000	1700	88
	PD-005	900000	890000	900	97
	PD-006	1400000	1380000	1400	91
	PD-007	1600000	1550000	1600	90
	PD-008	800000	790000	800	98
	PD-009	1800000	1750000	1800	87
	PD-010	2000000	1950000	2000	85
Project Epsilon	PE-001	1400000	1380000	1400	91
	PE-002	1600000	1550000	1600	89
	PE-003	1200000	1180000	1200	93
	PE-004	1800000	1750000	1800	87
	PE-005	1000000	980000	1000	96
	PE-006	1500000	1450000	1500	90
	PE-007	1700000	1650000	1700	88
	PE-008	900000	890000	900	97
	PE-009	1900000	1850000	1900	86
	PE-010	2100000	2050000	2100	84
Project Zeta	PZ-001	1500000	1480000	1500	90
	PZ-002	1700000	1650000	1700	88
	PZ-003	1300000	1280000	1300	92
	PZ-004	1900000	1850000	1900	86
	PZ-005	1100000	1080000	1100	94
	PZ-006	1600000	1550000	1600	89
	PZ-007	1800000	1750000	1800	87
	PZ-008	900000	890000	900	97
	PZ-009	2000000	1950000	2000	85
	PZ-010	2200000	2150000	2200	83
Project Eta	PH-001	1600000	1580000	1600	89
	PH-002	1800000	1750000	1800	87
	PH-003	1400000	1380000	1400	91
	PH-004	2000000	1950000	2000	85
	PH-005	1200000	1180000	1200	93
	PH-006	1700000	1650000	1700	88
	PH-007	1900000	1850000	1900	86
	PH-008	1000000	980000	1000	96
	PH-009	2100000	2050000	2100	84
	PH-010	2300000	2250000	2300	82
Project Theta	PT-001	1700000	1680000	1700	88
	PT-002	1900000	1850000	1900	86
	PT-003	1500000	1480000	1500	90
	PT-004	2100000	2050000	2100	84
	PT-005	1300000	1280000	1300	92
	PT-006	1800000	1750000	1800	87
	PT-007	2000000	1950000	2000	85
	PT-008	1100000	1080000	1100	94
	PT-009	2200000	2150000	2200	83
	PT-010	2400000	2350000	2400	81
Project Iota	PI-001	1800000	1780000	1800	87
	PI-002	2000000	1950000	2000	85
	PI-003	1600000	1580000	1600	89
	PI-004	2200000	2150000	2200	83
	PI-005	1400000	1380000	1400	91
	PI-006	1900000	1850000	1900	86
	PI-007	2100000	2050000	2100	84
	PI-008	1200000	1180000	1200	93
	PI-009	2300000	2250000	2300	82
	PI-010	2500000	2450000	2500	80
Project Kappa	PK-001	1900000	1880000	1900	86
	PK-002	2100000	2050000	2100	84
	PK-003	1700000	1680000	1700	88
	PK-004	2300000	2250000	2300	82
	PK-005	1500000	1480000	1500	90
	PK-006	2000000	1950000	2000	85
	PK-007	2200000	2150000	2200	83
	PK-008	1300000	1280000	1300	92
	PK-009	2400000	2350000	2400	81
	PK-010	2600000	2550000	2600	79
Project Lambda	PL-001	2000000	1980000	2000	85
	PL-002	2200000	2150000	2200	83
	PL-003	1800000	1780000	1800	87
	PL-004	2400000	2350000	2400	81
	PL-005	1600000	1580000	1600	89
	PL-006	2100000	2050000	2100	84
	PL-007	2300000	2250000	2300	82
	PL-008	1400000	1380000	1400	91
	PL-009	2500000	2450000	2500	80
	PL-010	2700000	2650000	2700	78
Project Mu	PM-001	2100000	2080000	2100	84
	PM-002	2300000	2250000	2300	82
	PM-003	1900000	1880000	1900	86
	PM-004	2500000	2450000	2500	80
	PM-005	1700000	1680000	1700	88
	PM-006	2200000	2150000	2200	83
	PM-007	2400000	2350000	2400	81
	PM-008	1500000	1480000	1500	90
	PM-009	2600000	2550000	2600	79
	PM-010	2800000	2750000	2800	77
Project Nu	PN-001	2200000	2180000	2200	83
	PN-002	2400000	2350000	2400	81
	PN-003	2000000	1980000	2000	85
	PN-004	2600000	2550000	2600	79
	PN-005	1800000	1780000	1800	87
	PN-006	2300000	2250000	2300	82
	PN-007	2500000	2450000	2500	80
	PN-008	1600000	1580000	1600	89
	PN-009	2700000	2650000	2700	78
	PN-010	2900000	2850000	2900	76
Project Xi	PX-001	2300000	2280000	2300	82
	PX-002	2500000	2450000	2500	80
	PX-003	2100000	2080000	2100	84
	PX-004	2700000	2650000	2700	78
	PX-005	1900000	1880000	1900	86
	PX-006	2400000	2350000	2400	81
	PX-007	2600000	2550000	2600	79
	PX-008	1700000	1680000	1700	88
	PX-009	2800000	2750000	2800	77
	PX-010	3000000	2950000	3000	75
Project Omicron	PO-001	2400000	2380000	2400	81
	PO-002	2600000	2550000	2600	79
	PO-003	2200000	2180000	2200	83
	PO-004	2800000	2750000	2800	77
	PO-005	2000000	1980000	2000	85
	PO-006	2500000	2450000	2500	80
	PO-007	2700000	2650000	2700	78
	PO-008	1800000	1780000	1800	87
	PO-009	2900000	2850000	2900	76
	PO-010	3100000	3050000	3100	74
Project Pi	PP-001	2500000	2480000	2500	80
	PP-002	2700000	2650000	2700	78
	PP-003	2300000	2280000	2300	82
	PP-004	2900000	2850000	2900	76
	PP-005	2100000	2080000	2100	84
	PP-006	2600000	2550000	2600	79
	PP-007	2800000	2750000	2800	77
	PP-008	1900000	1880000	1900	86
	PP-009	3000000	2950000	3000	75
	PP-010	3200000	3150000	3200	73
Project Rho	PR-001	2600000	2580000	2600	79
	PR-002	2800000	2750000	2800	77
	PR-003	2400000	2380000	2400	81
	PR-004	3000000	2950000	3000	75
	PR-005	2200000	2180000	2200	83
	PR-006	2700000	2650000	2700	78
	PR-007	2900000	2850000	2900	76
	PR-008	2000000	1980000	2000	85
	PR-009	3100000	3050000	3100	74
	PR-010	3300000	3250000	3300	72
Project Sigma	PS-001	2700000	2680000	2700	78
	PS-002	2900000	2850000	2900	76
	PS-003	2500000	2480000	2500	80
	PS-004	3100000	3050000	3100	74
	PS-005	2300000	2280000	2300	82
	PS-006	2800000	2750000	2800	77
	PS-007	3000000	2950000	3000	75
	PS-008	2100000	2080000	2100	84
	PS-009	3200000	3150000	3200	73
	PS-010	3400000	3350000	3400	71
Project Tau	PT-001	2800000	2780000	2800	77
	PT-002	3000000	2950000	3000	75
	PT-003	2600000	2580000	2600	79
	PT-004	3200000	3150000	3200	73
	PT-005	2400000	2380000	2400	81
	PT-006	2900000	2850000	2900	76
	PT-007	3100000	3050000	3100	74
	PT-008	2200000	2180000	2200	83
	PT-009	3300000	3250000	3300	72
	PT-010	3500000	3450000	3500	70
Project Upsilon	PU-001	2900000	2880000	2900	76
	PU-002	3100000	3050000	3100	74
	PU-003	2700000	2680000	2700	78
	PU-004	3300000	3250000	3300	72
	PU-005	2500000			

[illegible]

Project Information		Financial Summary		Operational Data	
Project ID	Project Name	Budget	Actual	Units Produced	Quality Score
001	Alpha Project	1000000	980000	15000	95%
002	Beta Project	2000000	1950000	30000	92%
003	Gamma Project	1500000	1480000	20000	90%
004	Delta Project	800000	790000	10000	98%
005	Epsilon Project	1200000	1180000	18000	93%
006	Zeta Project	900000	890000	12000	96%
007	Eta Project	1100000	1090000	16000	94%
008	Theta Project	1300000	1280000	19000	91%
009	Iota Project	700000	690000	8000	97%
010	Kappa Project	1600000	1580000	22000	93%
011	Lambda Project	1400000	1380000	18000	92%
012	Mu Project	1700000	1680000	24000	90%
013	Nu Project	1900000	1880000	28000	94%
014	Xi Project	1050000	1030000	14000	96%
015	Omicron Project	1250000	1230000	17000	93%
016	Pi Project	1150000	1130000	16000	95%
017	Rho Project	1350000	1330000	19000	92%
018	Sigma Project	1550000	1530000	22000	91%
019	Tau Project	1750000	1730000	25000	94%
020	Upsilon Project	1950000	1930000	29000	93%
021	Phi Project	1080000	1060000	14500	97%
022	Chi Project	1280000	1260000	17500	94%
023	Psi Project	1480000	1460000	20500	92%
024	Omega Project	1680000	1660000	23500	91%
025	Project A	1880000	1860000	27500	95%
026	Project B	1020000	1000000	13500	96%
027	Project C	1220000	1200000	16500	93%
028	Project D	1420000	1400000	19500	92%
029	Project E	1620000	1600000	22500	94%
030	Project F	1820000	1800000	26500	93%
031	Project G	1000000	980000	15000	95%
032	Project H	2000000	1950000	30000	92%
033	Project I	1500000	1480000	20000	90%
034	Project J	800000	790000	10000	98%
035	Project K	1200000	1180000	18000	93%
036	Project L	900000	890000	12000	96%
037	Project M	1100000	1090000	16000	94%
038	Project N	1300000	1280000	19000	91%
039	Project O	700000	690000	8000	97%
040	Project P	1600000	1580000	22000	93%
041	Project Q	1400000	1380000	18000	92%
042	Project R	1700000	1680000	24000	90%
043	Project S	1900000	1880000	28000	94%
044	Project T	1050000	1030000	14000	96%
045	Project U	1250000	1230000	17000	93%
046	Project V	1150000	1130000	16000	95%
047	Project W	1350000	1330000	19000	92%
048	Project X	1550000	1530000	22000	91%
049	Project Y	1750000	1730000	25000	94%
050	Project Z	1950000	1930000	29000	93%

[illegible]

Project Information		Financial Summary		Operational Data	
Project ID	Project Name	Budget	Actual Cost	Progress %	Completion Date
001	Project A	1000000	950000	95%	2023-12-31
002	Project B	2000000	1800000	90%	2024-01-15
003	Project C	1500000	1400000	93%	2024-02-01
004	Project D	800000	750000	94%	2024-02-10
005	Project E	1200000	1100000	92%	2024-02-20
006	Project F	900000	850000	94%	2024-03-05
007	Project G	1100000	1050000	95%	2024-03-15
008	Project H	700000	650000	93%	2024-03-25
009	Project I	1300000	1200000	92%	2024-04-01
010	Project J	600000	550000	92%	2024-04-10
011	Project K	1400000	1300000	93%	2024-04-20
012	Project L	500000	450000	90%	2024-05-01
013	Project M	1600000	1500000	94%	2024-05-10
014	Project N	400000	350000	88%	2024-05-20
015	Project O	1700000	1600000	94%	2024-06-01
016	Project P	300000	250000	83%	2024-06-10
017	Project Q	1900000	1800000	95%	2024-06-20
018	Project R	2500000	2300000	92%	2024-07-01
019	Project S	1800000	1700000	94%	2024-07-10
020	Project T	750000	700000	93%	2024-07-20
021	Project U	1150000	1050000	91%	2024-08-01
022	Project V	650000	600000	91%	2024-08-10
023	Project W	1350000	1250000	93%	2024-08-20
024	Project X	550000	500000	91%	2024-09-01
025	Project Y	1550000	1450000	93%	2024-09-10
026	Project Z	450000	400000	89%	2024-09-20
027	Project AA	1650000	1550000	94%	2024-10-01
028	Project AB	350000	300000	86%	2024-10-10
029	Project AC	1750000	1650000	94%	2024-10-20
030	Project AD	2200000	2000000	91%	2024-11-01
031	Project AE	850000	800000	94%	2024-11-10
032	Project AF	1250000	1150000	92%	2024-11-20
033	Project AG	700000	650000	93%	2024-12-01
034	Project AH	1450000	1350000	93%	2024-12-10
035	Project AI	500000	450000	90%	2024-12-20
036	Project AJ	1500000	1400000	93%	2025-01-01
037	Project AK	400000	350000	88%	2025-01-10
038	Project AL	1600000	1500000	94%	2025-01-20
039	Project AM	300000	250000	83%	2025-02-01
040	Project AN	1900000	1800000	95%	2025-02-10
041	Project AO	2500000	2300000	92%	2025-02-20
042	Project AP	1800000	1700000	94%	2025-03-01
043	Project AQ	750000	700000	93%	2025-03-10
044	Project AR	1150000	1050000	91%	2025-03-20
045	Project AS	650000	600000	91%	2025-04-01
046	Project AT	1350000	1250000	93%	2025-04-10
047	Project AU	550000	500000	91%	2025-04-20
048	Project AV	1550000	1450000	93%	2025-05-01
049	Project AW	450000	400000	89%	2025-05-10
050	Project AX	1650000	1550000	94%	2025-05-20
051	Project AY	350000	300000	86%	2025-06-01
052	Project AZ	1750000	1650000	94%	2025-06-10
053	Project BA	2200000	2000000	91%	2025-06-20
054	Project BB	850000	800000	94%	2025-07-01
055	Project BC	1250000	1150000	92%	2025-07-10
056	Project BD	700000	650000	93%	2025-07-20
057	Project BE	1450000	1350000	93%	2025-08-01
058	Project BF	500000	450000	90%	2025-08-10
059	Project BG	1500000	1400000	93%	2025-08-20
060	Project BH	400000	350000	88%	2025-09-01
061	Project BI	1600000	1500000	94%	2025-09-10
062	Project BJ	300000	250000	83%	2025-09-20
063	Project BK	1900000	1800000	95%	2025-10-01
064	Project BL	2500000	2300000	92%	2025-10-10
065	Project BM	1800000	1700000	94%	2025-10-20
066	Project BN	750000	700000	93%	2025-11-01
067	Project BO	1150000	1050000	91%	2025-11-10
068	Project BP	650000	600000	91%	2025-11-20
069	Project BQ	1350000	1250000	93%	2025-12-01
070	Project BR	550000	500000	91%	2025-12-10
071	Project BS	1550000	1450000	93%	2025-12-20
072	Project BT	450000	400000	89%	2026-01-01
073	Project BU	1650000	1550000	94%	2026-01-10
074	Project BV	350000	300000	86%	2026-01-20
075	Project BW	1750000	1650000	94%	2026-02-01
076	Project BX	2200000	2000000	91%	2026-02-10
077	Project BY	850000	800000	94%	2026-02-20
078	Project BZ	1250000	1150000	92%	2026-03-01
079	Project CA	700000	650000	93%	2026-03-10
080	Project CB	1450000	1350000	93%	2026-03-20
081	Project CC	500000	450000	90%	2026-04-01
082	Project CD	1500000	1400000	93%	2026-04-10
083	Project CE	400000	350000	88%	2026-04-20
084	Project CF	1600000	1500000	94%	2026-05-01
085	Project CG	300000	250000	83%	2026-05-10
086	Project CH	1900000	1800000	95%	2026-05-20
087	Project CI	2500000	2300000	92%	2026-06-01
088	Project CJ	1800000	1700000	94%	2026-06-10
089	Project CK	750000	700000	93%	2026-06-20
090	Project CL	1150000	1050000	91%	2026-07-01
091	Project CM	650000	600000	91%	2026-07-10
092	Project CN	1350000	1250000	93%	2026-07-20
093	Project CO	550000	500000	91%	2026-08-01
094	Project CP	1550000	1450000	93%	2026-08-10
095	Project CQ	450000	400000	89%	2026-08-20
096	Project CR	1650000	1550000	94%	2026-09-01
097	Project CS	350000	300000	86%	2026-09-10
098	Project CT	1750000	1650000	94%	2026-09-20
099	Project CU	2200000	2000000	91%	2026-10-01
100	Project CV	850000	800000	94%	2026-10-10

																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			</
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	----

Project Information		Financial Summary		Operational Data	
Project Name	Project ID	Budget	Actual	Units Produced	Quality Score
Project Alpha	Alpha-001	1000000	980000	15000	95
	Alpha-002	1200000	1150000	18000	92
	Alpha-003	800000	780000	12000	98
	Alpha-004	900000	850000	14000	90
	Alpha-005	1100000	1080000	16000	93
	Alpha-006	700000	680000	10000	96
	Alpha-007	1300000	1250000	20000	91
	Alpha-008	600000	580000	8000	97
	Alpha-009	1400000	1350000	22000	89
	Alpha-010	500000	480000	6000	99
Project Beta	Beta-001	1500000	1450000	25000	88
	Beta-002	1800000	1750000	30000	85
	Beta-003	1200000	1180000	20000	90
	Beta-004	1600000	1550000	28000	87
	Beta-005	1400000	1380000	24000	89
	Beta-006	1700000	1650000	26000	86
	Beta-007	1100000	1080000	18000	91
	Beta-008	1900000	1850000	32000	84
	Beta-009	1300000	1280000	22000	88
	Beta-010	1600000	1580000	27000	86
Project Gamma	Gamma-001	2000000	1950000	35000	82
	Gamma-002	2200000	2150000	40000	80
	Gamma-003	1800000	1780000	32000	85
	Gamma-004	2100000	2050000	38000	81
	Gamma-005	1900000	1880000	34000	83
	Gamma-006	2300000	2250000	42000	79
	Gamma-007	1700000	1680000	30000	86
	Gamma-008	2400000	2350000	45000	78
	Gamma-009	1600000	1580000	28000	87
	Gamma-010	2500000	2450000	48000	77
Project Delta	Delta-001	3000000	2950000	60000	75
	Delta-002	3200000	3150000	65000	73
	Delta-003	2800000	2780000	55000	78
	Delta-004	3100000	3050000	62000	74
	Delta-005	2900000	2880000	58000	76
	Delta-006	3300000	3250000	68000	72
	Delta-007	2700000	2680000	52000	79
	Delta-008	3400000	3350000	70000	71
	Delta-009	2600000	2580000	50000	80
	Delta-010	3500000	3450000	72000	70
Project Epsilon	Epsilon-001	4000000	3950000	80000	68
	Epsilon-002	4200000	4150000	85000	66
	Epsilon-003	3800000	3780000	75000	71
	Epsilon-004	4100000	4050000	82000	67
	Epsilon-005	3900000	3880000	78000	69
	Epsilon-006	4300000	4250000	88000	65
	Epsilon-007	3700000	3680000	72000	72
	Epsilon-008	4400000	4350000	90000	64
	Epsilon-009	3600000	3580000	70000	73
	Epsilon-010	4500000	4450000	92000	63
Project Zeta	Zeta-001	5000000	4950000	100000	60
	Zeta-002	5200000	5150000	105000	58
	Zeta-003	4800000	4780000	95000	63
	Zeta-004	5100000	5050000	102000	59
	Zeta-005	4900000	4880000	98000	61
	Zeta-006	5300000	5250000	108000	57
	Zeta-007	4700000	4680000	92000	64
	Zeta-008	5400000	5350000	110000	56
	Zeta-009	4600000	4580000	90000	65
	Zeta-010	5500000	5450000	112000	55
Project Eta	Eta-001	6000000	5950000	120000	52
	Eta-002	6200000	6150000	125000	50
	Eta-003	5800000	5780000	115000	55
	Eta-004	6100000	6050000	122000	51
	Eta-005	5900000	5880000	118000	53
	Eta-006	6300000	6250000	128000	49
	Eta-007	5700000	5680000	112000	56
	Eta-008	6400000	6350000	130000	48
	Eta-009	5600000	5580000	110000	57
	Eta-010	6500000	6450000	132000	47
Project Theta	Theta-001	7000000	6950000	140000	45
	Theta-002	7200000	7150000	145000	43
	Theta-003	6800000	6780000	135000	48
	Theta-004	7100000	7050000	142000	44
	Theta-005	6900000	6880000	138000	46
	Theta-006	7300000	7250000	148000	42
	Theta-007	6700000	6680000	132000	49
	Theta-008	7400000	7350000	150000	41
	Theta-009	6600000	6580000	130000	50
	Theta-010	7500000	7450000	152000	40
Project Iota	Iota-001	8000000	7950000	160000	38
	Iota-002	8200000	7950000	165000	36
	Iota-003	7800000	7780000	155000	41
	Iota-004	8100000	8050000	162000	37
	Iota-005	7900000	7880000	158000	39
	Iota-006	8300000	8250000	168000	35
	Iota-007	7700000	7680000	152000	42
	Iota-008	8400000	8350000	170000	34
	Iota-009	7600000	7580000	150000	43
	Iota-010	8500000	8450000	172000	33
Project Kappa	Kappa-001	9000000	8950000	180000	30
	Kappa-002	9200000	8950000	185000	28
	Kappa-003	8800000	8780000	175000	33
	Kappa-004	9100000	9050000	182000	29
	Kappa-005	8900000	8880000	178000	31
	Kappa-006	9300000	9250000	188000	27
	Kappa-007	8700000	8680000	172000	34
	Kappa-008	9400000	9350000	190000	26
	Kappa-009	8600000	8580000	170000	35
	Kappa-010	9500000	9450000	192000	25
Project Lambda	Lambda-001	10000000	9950000	200000	22
	Lambda-002	10200000	9950000	205000	20
	Lambda-003	9800000	9780000	195000	25
	Lambda-004	10100000	10050000	202000	21
	Lambda-005	9900000	9880000	198000	23
	Lambda-006	10300000	10250000	208000	19
	Lambda-007	9700000	9680000	192000	26
	Lambda-008	10400000	10350000	210000	18
	Lambda-009	9600000	9580000	190000	27
	Lambda-010	10500000	10450000	212000	17
Project Mu	Mu-001	11000000	10950000	220000	15
	Mu-002	11200000	10950000	225000	13
	Mu-003	10800000	10780000	215000	18
	Mu-004	11100000	11050000	222000	14
	Mu-005	10900000	10880000	218000	16
	Mu-006	11300000	11250000	228000	12
	Mu-007	10700000	10680000	212000	19
	Mu-008	11400000	11350000	230000	11
	Mu-009	10600000	10580000	210000	20
	Mu-010	11500000	11450000	232000	10
Project Nu	Nu-001	12000000	11950000	240000	8
	Nu-002	12200000	11950000	245000	6
	Nu-003	11800000	11780000	235000	11
	Nu-004	12100000	12050000	242000	7
	Nu-005	11900000	11880000	238000	9
	Nu-006	12300000	12250000	248000	5
	Nu-007	11700000	11680000	232000	12
	Nu-008	12400000	12350000	250000	4
	Nu-009	11600000	11580000	230000	13
	Nu-010	12500000	12450000	252000	3
Project Xi	Xi-001	13000000	12950000	260000	5
	Xi-002	13200000	12950000	265000	3
	Xi-003	12800000	12780000	255000	8
	Xi-004	13100000	13050000	262000	4
	Xi-005	12900000	12880000	258000	6
	Xi-006	13300000	13250000	268000	2
	Xi-007	12700000	12680000	252000	9
	Xi-008	13400000	13350000	270000	1
	Xi-009	12600000	12580000	250000	10
	Xi-010	13500000	13450000	272000	0
Project Omicron	Omicron-001	14000000	13950000	280000	2
	Omicron-002	14200000	13950000	285000	0
	Omicron-003	13800000	13780000	275000	5
	Omicron-004	14100000	14050000	282000	1
	Omicron-005	13900000	13880000	278000	3
	Omicron-006	14300000	14250000	288000	0
	Omicron-007	13700000	13680000	272000	6
	Omicron-008	14400000	14350000	290000	-1
	Omicron-009	13600000	13580000	270000	7
	Omicron-010	14500000	14450000	292000	-2
Project Pi	Pi-001	15000000	14950000	300000	-3
	Pi-002	15200000	14950000	305000	-5
	Pi-003	14800000	14780000	295000	0
	Pi-004	15100000	15050000	302000	-4
	Pi-005	14900000	14880000	298000	-2
	Pi-006	15300000	15250000	308000	-6
	Pi-007	14700000	14680000	292000	1
	Pi-008	15400000	15350000	310000	-7
	Pi-009	14600000	14580000	290000	2
	Pi-010	15500000	15450000	312000	-8
Project Rho	Rho-001	16000000	15950000	320000	-5
	Rho-002	16200000	15950000	325000	-7
	Rho-003	15800000	15780000	315000	0
	Rho-004	16100000	16050000	322000	-6
	Rho-005	15900000	15880000	318000	-4
	Rho-006	16300000	16250000	328000	-8
	Rho-007	15700000	15680000	312000	1
	Rho-008	16400000	16350000	330000	-9
	Rho-009	15600000	15580000	310000	2
	Rho-010	16500000	16450000	332000	-10
Project Sigma	Sigma-001	17000000	16950000	340000	-7
	Sigma-002	17200000	16950000	345000	-9
	Sigma-003	16800000	16780000	335000	0
	Sigma-004	17100000	17050000	342000	-8
	Sigma-005	16900000	16880000	338000	-6
	Sigma-006	17300000	17250000	348000	-10
	Sigma-007	16700000	16680000	332000	1
	Sigma-008	17400000	17350000	350000	-11
	Sigma-009	16600000	16580000	330000	2
	Sigma-010	17500000	17450000	352000	-12
Project Tau	Tau-001	18000000	17950000	360000	-9
	Tau-002	18200000	17950000	365000	-11
	Tau-003	17800000	17780000	355000	0
	Tau-004	18100000	18050000	362000	-10
	Tau-005	17900000	17880000	358000	-8
	Tau-006	18300000	18250000	368000	-12
	Tau-007	17700000	17680000	352000	1
	Tau-008	18400000	18350000	370000	-13

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Cover Page

HIOS Issuer ID: 31609

HIOS Product ID: 31609PA015

This PDF file contains an actuarial certification for the unique plan designs under Issuer ID 31609. Please refer to all of the pages contained herein.

Unique Plan Design Supporting Documentation and Justification

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 31609

HIOS Product IDs: 31609PA015

Applicable HIOS Plan IDs (Standard Component): 31609PA0150025, 31609PA0150026, 31609PA0150027, 31609PA0150028, 31609PA0150047, 31609PA0150049, 31609PA0150048, 31609PA0150029

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 1/1/2021. 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 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 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 varies by site of service. X-rays and diagnostic imaging accounts for roughly 4% of allowed costs in the AV calculation.

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

31609PA0150028, 31609PA0150047, 31609PA0150048, and 31609PA0150029 have cost-sharing for outpatient facility fee which varies by site of service. Outpatient facility fee accounts for roughly 14% 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 (for plans with no deductible), x-rays, imaging, and outpatient facility site of service 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 used our commercial PPO and HMO data incurred between July 2018 and June 2019.

For the physical therapy and radiology site-of-service utilization, we used our commercial PPO data incurred between July 2018 and June 2019.

For the freestanding and hospital utilization data for laboratory services, we used our commercial PPO data incurred between July 2018 and June 2019.

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 \$53.60, while 80% of units are at a freestanding setting with an average unit cost of \$20.16. Taking a weighted average of a 50% issuer coinsurance applied to \$53.60 and a 100% issuer coinsurance applied to \$20.16 produced an average issuer paid amount of \$21.21 out of an average cost of \$25.44, giving an effective issuer coinsurance of 83.4% which was entered into the AV calculator.

Occupational and Physical Therapy Site-of-service Differential

For the physical therapy site of service cost-sharing, our recent data indicated that 88 % 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 45% 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 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.

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

For the imaging site of service cost-sharing, our recent data indicated that 45% 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 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.

Outpatient Facility Fee Site-of-service Differential

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

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

		Cost-sharing		
HIOS ID	Service Type	Preferred Site	Non-preferred Site	AV Input
31609PA0150025	Phys. Ther.	\$20	\$50	\$23.60
	X-rays	\$50	\$150	\$105.00
	Imaging	\$125	\$250	\$194.00
31609PA0150026	Phys. Ther.	\$40	\$70	\$43.60
	X-rays	\$50	\$150	\$105.00
	Imaging	\$125	\$250	\$193.75
31609PA0150027	Phys. Ther.	\$80	\$110	\$83.60
	X-rays	\$70	\$175	\$127.75
	Imaging	\$150	\$300	\$232.50
31609PA0150028	Phys. Ther.	\$40	\$80	\$44.80
	X-rays	80%	60%	64%
	Imaging	80%	60%	65%
	OP Facility	80%	50%	56%
31609PA0150047	Phys. Ther.	\$80	\$110	\$83.60
	X-rays	\$70	\$175	\$127.75
	Imaging	\$150	\$300	\$232.50
	OP Facility	100%	70%	76%
31609PA0150049	Phys. Ther.	\$80	\$110	\$83.60
	X-rays	\$80	\$200	\$146.00
	Imaging	\$200	\$400	\$310.00
31609PA0150048	Phys. Ther.	\$100	\$130	\$103.60
	X-rays	\$80	\$200	\$146.00
	Imaging	\$200	\$400	\$310.00
	OP Facility	90%	70%	74%
31609PA0150029	Phys. Ther.	\$60	\$90	\$63.60
	X-rays	70%	50%	54%
	Imaging	70%	50%	55%
	OP Facility	70%	50%	54%

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 at 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.

HIOS ID	AV		
	Free-standing	Hospital	Average
31609PA0150028	81.00%	79.58%	80.72%
31609PA0150047	80.71%	78.99%	80.36%
31609PA0150049	71.88%	69.93%	71.49%
31609PA0150048	71.27%	69.27%	70.87%
31609PA0150029	72.29%	70.49%	71.93%

Utilization	80%	20%
-------------	-----	-----

Certification Language:

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

The analysis was

(i) conducted by a member of the American Academy of Actuaries; and

(ii) performed in accordance with generally accepted actuarial principles and methodologies.

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

Actuary signature: _____

Actuary Printed Name: _____

Date: _____ 5/19/2020

A COVID-19 Morbidity Adjustment of 1.01 was used in the rate calculation.

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

The change in the average age was measured by comparing the average age factor calculated in this filing, based on May 2019 enrollments, to the average age factor calculated for the prior annual filing.

	2020	2021	
	Filing	Filing	Change
Age Factor	1.512	1.513	1.001
Geographic Factor	1.000	1.000	1.000
Tobacco Factor	1.013	1.006	0.993
Total change			0.994

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

DOCUMENT

URRT Part III – Federal Actuarial Memorandum

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 (page 7)

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

Cover Letter

Redacted names and contact information (page 2)

AV Screenshots

Entire File Redacted

Unique AV Justification file

Redacted name of opining actuary (pages 4 and 13)

Redacted AV Screenshots (pages 5-9 and 14-24)

Market: Small Group



Key (*modify as needed*)

 : On-exchange service area

 : Off-exchange only service area

1. **The cover letter and rate change request summary indicate that the average rate change requested is 1.3%, with the range varying from -1.2% to 6.7%. The Part III Actuarial Memorandum indicates that the average rate change requested is -0.2%, with the range varying from -0.8% to 3.7%. The Pennsylvania Actuarial Memorandum indicates the average proposed rate change is -2.1%. Worksheet II of the URRT shows rate changes by plan varying from 9.1% to 13.2%. Please explain these discrepancies.**

We corrected Worksheet 2 of the URRT to show the proposed increases for this filing.

2. **The estimated experience period risk adjustment included in the URRT is -\$3.89 PMPM. The independent estimates calculated by the PID suggest that the experience period risk adjustment amount is \$7.46 PMPM. Please reconcile this difference.**

We are working to provide the information in a subsequent response.

3. **The following questions are related to the projected risk adjustment transfer amount:**
 - a. **Please explain and provide the quantitative development of the projected risk adjustment transfer amount PMPM.**
 - b. **Please compare the projected 2021 risk adjustment transfer amount PMPM to the anticipated 2019 risk adjustment transfer amount PMPM and identify the specific driver(s) of any differences between the two values**

We are working to provide the information in a subsequent response.

4. **The following questions are related to the proposed annual trend rate included in the filing.**
 - a. **A number of the filing documents, including the rate change request summary and Part II Justification indicate that a trend of 8.9% has been assumed in rate development. However, the URRT and rate exhibits show that an overall annual trend of 12.1% has been applied. Please explain this discrepancy.**
 - b. **Please provide the actual observed trends based on historical allowed claims experience for each benefit category for years 2017, 2018, 2019, and 2020 (year to date). We realize 2020 trends will be partially based on estimated claim costs. In providing your response, for each calendar year, provide the total member months, allowed claims, and any normalization adjustments that should be applied to the claims experience.**
 - c. **Please compare the proposed annual trend rate to the actual observed trend rates per your response above. To the extent they are significantly different, please explain and justify why it is reasonable that they should be different.**

We are working to provide the information in a subsequent response.

5. **Please provide a numerical development of the average 2020 and 2021 age and tobacco factors as shown in the file [ACA QCC SG Supporting 05192020 RV.xlsx].**

We used the February 2020 membership to calculate the 2021 age and tobacco factors. The 2020 factors are those calculated in last year's annual filing based on February 2019 membership. The calculations are shown on Tab Q5&6 of the "QCC Small Group Response to June 16 Obj" excel worksheet.

- 6. Please reconcile the change in the age factor included in the file [ACA QCC SG Supporting 05192020 RV.xlsx] with the change in demographic factor included in Table 5 of the rate filing exhibits.**

The change in the average age factor is calculated by comparing the projected 2021 average age factor to the age factor calculated for 2019 as of February 2020. The 2019 factor is based on the entire year's membership instead of just the membership as of February 2019, making it more consistent with the experience period premiums and claims. The calculation is shown on Tab Q5&6 of the "QCC Small Group Response to June 16 Obj" excel worksheet.

- 7. Please explain why the pricing AVs are significantly lower than the metal AVs for Bronze plans, as shown in Table 10 of the rate filing exhibits. In addition, please compare the average 2021 pricing AV's by metal level to the actual observed 2019 paid-to-allowed ratios by metal level. To the extent the pricing AV's are significantly different than the actual observed experience for a particular metal level, please explain and justify why the pricing AV's are appropriate.**

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

- 8. The following questions are related to the quarterly small group index rate development:**
a. Please show support and explain the methodology used to project the quarterly member months shown in Table 5A.

The member months used for weights are the member months based on their renewal dates in 2019.

- b. Please demonstrate quantitatively how the 1.6% quarterly trend factor being utilized in Table 5A was developed.**

[We are working to provide the information in a subsequent response.](#)

- 9. Please provide the numerical development of the projected 2021 MLR that shows compliance with the 80% minimum MLR.**

The calculation of the MLR is shown on Tab Q9 of the "QCC Small Group Response to June 16 Obj" excel worksheet.

- 10. Please explain and provide support for the 1.01 adjustment factor for benefits in addition to EHB as demonstrated in Table 10 of the rate filing exhibits.**

The adjustment factor was applied to off-exchange plans to reflect the projected cost of non-elective abortion coverage, adult vision, and acupuncture included in these plans.

- 11. The sum of rate increase components shown in Table 8 Line H of the rate filing exhibits does not approximate Line A as indicated by the label. Please explain why this value varies**

significantly.

We are working to provide the information in a subsequent response. The difference does not appear to be very large. We also had a rate revision effective April 1, 2020.

- 12. The Part III Actuarial Memorandum refers to KHPE experience in numerous places. Please review and update to reference QCC, as necessary.**

We have corrected the Part II Actuarial Memorandum.

- 13. The information shown in columns Z and AA of Table 10 should provide a direct year-over-year calibrated PAIR comparison to generate the rate increase shown in column AC. Please identify the source of the data shown in column Z; the Department anticipates that column Z of the current small group filing will consist of the data in column AA from the 2020 annual filing adjusted by the Q1 trend factor found in Cell J35 in Table 5A of that filing. This will result in the comparison of a Q1 2020 calibrated PAIR with a Q1 2021 calibrated PAIR. This will yield a proper apples-to-apples comparison.**

We have made this revision in the AM Exhibit.

- 14. Also, provide an exhibit showing the average quarterly rate change (Q1 2021/Q1 2020 - approved, Q2 2021/Q2 2020 - approved, etc.) groups will see if the proposed rates are approved, with these rate changes then weighted by enrollment to produce an aggregate change for the four quarters.**

This is shown on Tab Q14 of the “QCC Small Group Response June 16 Obj” excel worksheet.

- 15. The Risk Adjustment User Fee has been finalized at \$0.25 pmpm; please revise Table 6 accordingly.**

We have made this revision.

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

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

- 17. For the expanded Bronze plans, please demonstrate that the copay is less than or equal to 50% coinsurance for that category.**

Our average allowed cost per visit for PCP is about \$107. Therefore \$50 PCP copay is less than 50% coinsurance.

- 18. Please provide an exhibit showing the financial gains and losses for calendar years 2014 – 2019 for the following categories: Member months, total administrative expenses, total incurred claims, total premium, total actual paid taxes and fees, profit, annual underwriting gain/loss and underwriting gain/loss pmpy.**

We are working to provide the information in a subsequent response.

- 19. Per the Department’s published guidance, the Benefit Richness factors in Table 10 Column L should be developed based upon the following formula: (Plan Pricing AV in column K * CSR Defunding Adjustment in column P)^2 - (Plan Pricing AV in column K * CSR Defunding Adjustment in column P) + 1.24. Further, the value developed by the quadratic formula must then be multiplied by a normalization constant such that the value in Cell L15 or L16 balances back to 1.000. Please modify the cells in Column L to explicitly show the quadratic formula and normalizing constant to demonstrate compliance with our guidance.**

The calculation of the MLR is shown on Tab Q19 of the “QCC Small Group Response to June 16 Obj” excel worksheet. This shows that we followed the department’s guidance. The normalization requires two levels of calculation that could not simply be demonstrated in the cells in Column L. We calculated factors by plan based on the formula, then divided each result by the weighted average to normalize Cells L15 and L16 to 1.000 while maintaining the relativities between each plan’s factors. We have copied the resulting formulas into Table 10.

- 20. Section 4.3 of the 2021 URR Instructions requires issuers to discuss the reason for rate increase(s): Issuers must provide the quantitative impact and a narrative description of all significant factors driving the proposed rate increase. As an example, these factors could include:**
- Single risk pool experience which is more adverse than that assumed in the current rates
 - Medical inflation
 - Increased utilization
 - Prospective changes to benefits covered by the product or successor products
 - New taxes and fees imposed on the issuer
 - Anticipated changes in the average morbidity of the covered population that is market-wide, as opposed to issuer specific morbidity that is reflected in risk adjustment

We have added this information to the URRT Part III.

- 21. If the requested rate increase is not the same across all products and plans, provide an explanation as to why the rate changes vary by product or plan given they are based on the same single risk pool of experience for the market. Explain how the impact of morbidity was removed from impacting the variance in rate changes across products or plans.**

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

- 22. In Table 2, please update the risk adjustment amount to reflect the risk adjustment transfer shared by the Department on May 23, 2020 from Jim Laverty.**

[We are working to provide the information in a subsequent response.](#)

- 23. Please provide by service category the emerging data and resulting trend for the current calendar year to-date as of the end of May.**

We are working to provide the information in a subsequent response.

24. Regarding Trend:

- a. Was the data in Table 4 utilized in developing the proposed trend?**
- b. Is the data in Table 4 raw unadjusted data or has it been normalized or otherwise adjusted?**
If the data has been adjusted, please provide an exhibit that quantitatively shows the unadjusted allowed monthly data for the 48 months. Also include the following monthly data:
 - i. The average age factor;**
 - ii. The average geographic factor;**
 - iii. The average tobacco factor; and**
 - iv. The average benefit factor;**
 - v. The normalized average pmpm (should match the allowed pmpms in column L of Table 4).**

We are working to provide the additional information in a subsequent response.

25. Cell D16 of Table 5 should contain a formula, specifically the product of the 1.01 factor to reflect the repeal of the individual mandate and any other assumption that produces the amount shown in that cell. Please revise; I note that the formula could be as simple as 1.01×1 .

We have entered the formula “1.01*1” in this cell.

26. Regarding Table 6:

- a. Please provide the proposed commission schedules for 2021.**
- b. Using the proposed commission schedules, quantitatively show the development of the percent and pmpm amounts in cells C51 and D51.**
- c. Using the 2019 SHCE in the Annual Statement, please quantitatively show the development of the Quality Improvement Initiatives percent and pmpm amount.**
- d. We have repurposed row 54 to capture RA User Fees. Please provide the RA User Fee percentage and pmpm amount in cells C54 and D54.**

We are working to provide the information in a subsequent response.

27. Please provide an exhibit that shows, by HIOS Plan ID, summary benefit and cost sharing changes for 2021 relative to the 2020 design for all plans to be offered in 2021. Include Pricing AV columns for 2020 and 2021. Please show the approved 2020 Pricing AVs for all plans in the 2020 column and the proposed 2021 Pricing AVs in the 2021 column. Also provide a supporting worksheet that shows the quantitative development of the proposed factors.

We are working to provide the information in a subsequent response.

28. Please provide an exhibit that quantitatively shows a comparison of the actual to projected claim cost pmpms for calendar years 2015 – 2019, as applicable.

We are working to provide the information in a subsequent response.

Cover Letter - Responses to June 16 Objection Letter – QCC Small Group INAC-132358831
Response Date June 30, 2020

1. **The cover letter and rate change request summary indicate that the average rate change requested is 1.3%, with the range varying from -1.2% to 6.7%. The Part III Actuarial Memorandum indicates that the average rate change requested is -0.2%, with the range varying from -0.8% to 3.7%. The Pennsylvania Actuarial Memorandum indicates the average proposed rate change is -2.1%. Worksheet II of the URRT shows rate changes by plan varying from 9.1% to 13.2%. Please explain these discrepancies.**

We corrected Worksheet 2 of the URRT to show the proposed increases for this filing.

2. **The estimated experience period risk adjustment included in the URRT is -\$3.89 PMPM. The independent estimates calculated by the PID suggest that the experience period risk adjustment amount is \$7.46 PMPM. Please reconcile this difference.**

We are working to provide the information in a subsequent response. The -\$3.89 is in line with what we expect our ultimate transfer amount to be based on an updated RATEE file. The updated file is not final yet.

3. **The following questions are related to the projected risk adjustment transfer amount:**
 - a. **Please explain and provide the quantitative development of the projected risk adjustment transfer amount PMPM.**
 - b. **Please compare the projected 2021 risk adjustment transfer amount PMPM to the anticipated 2019 risk adjustment transfer amount PMPM and identify the specific driver(s) of any differences between the two values**

Please refer to Tab Q3 of the “KHPE Small Group Response to June 16 Obj” excel worksheet.

4. **The following questions are related to the proposed annual trend rate included in the filing.**
 - a. **A number of the filing documents, including the rate change request summary and Part II Justification indicate that a trend of 8.9% has been assumed in rate development. However, the URRT and rate exhibits show that an overall annual trend of 6.2% has been applied. Please explain this discrepancy.**

The URRT Part II states “We are projecting that claims will increase by 8.9% in 2021” and the Rate Change Request Summary states “The company expects its annual medical costs to increase 8.9%”. These are one-year estimates from 2020 to 2021. The 6.2% trend in the URRT is the annual trend applied to the experience period data over two years to calculate the projected period claims.

b. Please provide the actual observed trends based on historical allowed claims experience for each benefit category for years 2017, 2018, 2019, and 2020 (year to date). We realize 2020 trends will be partially based on estimated claim costs. In providing your response, for each calendar year, provide the total member months, allowed claims, and any normalization adjustments that should be applied to the claims experience.

We have added historical trend information in Tab Q4b of the “QCC Small Group Response to June 16 Obj” excel worksheet.

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

Cover Letter - Responses to June 16 Objection Letter – QCC Small Group INAC-132358831
Response Date June 30, 2020

We have added historical trend information in Tab Q4b of the “QCC Small Group Response to June 16 Obj” excel worksheet.

- 5. Please provide a numerical development of the average 2020 and 2021 age and tobacco factors as shown in the file [ACA QCC SG Supporting 05192020 RV.xlsx].**

We used the February 2020 membership to calculate the 2021 age and tobacco factors. The 2020 factors are those calculated in last year’s annual filing based on February 2019 membership. The calculations are shown on Tab Q5&6 of the “QCC Small Group Response to June 16 Obj” excel worksheet.

- 6. Please reconcile the change in the age factor included in the file [ACA QCC SG Supporting 05192020 RV.xlsx] with the change in demographic factor included in Table 5 of the rate filing exhibits.**

The change in the average age factor is calculated by comparing the projected 2021 average age factor to the age factor calculated for 2019 as of February 2020. The 2019 factor is based on the entire year’s membership instead of just the membership as of February 2019, making it more consistent with the experience period premiums and claims. The calculation is shown on Tab Q5&6 of the “QCC Small Group Response to June 16 Obj” excel worksheet.

- 7. Please explain why the pricing AVs are significantly lower than the metal AVs for Bronze plans, as shown in Table 10 of the rate filing exhibits. In addition, please compare the average 2021 pricing AV’s by metal level to the actual observed 2019 paid-to-allowed ratios by metal level. To the extent the pricing AV’s are significantly different than the actual observed experience for a particular metal level, please explain and justify why the pricing AV’s are appropriate.**

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

- 8. The following questions are related to the quarterly small group index rate development:**
a. Please show support and explain the methodology used to project the quarterly member months shown in Table 5A.

The member months used for weights are the member months based on their renewal dates in 2019.

- b. Please demonstrate quantitatively how the 1.6% quarterly trend factor being utilized in Table 5A was developed.**

For the purpose of the quarterly trend factor, we estimated a 6.5% trend on claims from 2021 into 2022. The 1.6% quarterly trend is one fourth of the 6.5% $[1.065^{(0.25)}] = 1.016$.

- 9. Please provide the numerical development of the projected 2021 MLR that shows compliance with the 80% minimum MLR.**

Cover Letter - Responses to June 16 Objection Letter – QCC Small Group INAC-132358831
Response Date June 30, 2020

The calculation of the MLR is shown on Tab Q9 of the “QCC Small Group Response to June 16 Obj” excel worksheet.

10. Please explain and provide support for the 1.01 adjustment factor for benefits in addition to EHB as demonstrated in Table 10 of the rate filing exhibits.

The adjustment factor was applied to off-exchange plans to reflect the projected cost of non-elective abortion coverage, adult vision, and acupuncture included in these plans.

11. The sum of rate increase components shown in Table 8 Line H of the rate filing exhibits does not approximate Line A as indicated by the label. Please explain why this value varies significantly.

We are working to provide the information in a subsequent response. The difference does not appear to be very large. We also had a rate revision effective April 1, 2020.

12. The Part III Actuarial Memorandum refers to KHPE experience in numerous places. Please review and update to reference QCC, as necessary.

We have corrected the Part II Actuarial Memorandum.

13. The information shown in columns Z and AA of Table 10 should provide a direct year-over-year calibrated PAIR comparison to generate the rate increase shown in column AC. Please identify the source of the data shown in column Z; the Department anticipates that column Z of the current small group filing will consist of the data in column AA from the 2020 annual filing adjusted by the Q1 trend factor found in Cell J35 in Table 5A of that filing. This will result in the comparison of a Q1 2020 calibrated PAIR with a Q1 2021 calibrated PAIR. This will yield a proper apples-to-apples comparison.

We have made this revision in the AM Exhibit.

14. Also, provide an exhibit showing the average quarterly rate change (Q1 2021/Q1 2020 - approved, Q2 2021/Q2 2020 - approved, etc.) groups will see if the proposed rates are approved, with these rate changes then weighted by enrollment to produce an aggregate change for the four quarters.

This is shown on Tab Q14 of the “QCC Small Group Response June 16 Obj” excel worksheet.

15. The Risk Adjustment User Fee has been finalized at \$0.25 pmpm; please revise Table 6 accordingly.

We have made this revision.

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

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

17. For the expanded Bronze plans, please demonstrate that the copay is less than or equal to 50% coinsurance for that category.

Our average allowed cost per visit for PCP is about \$107. Therefore \$50 PCP copay is less than 50% coinsurance.

18. Please provide an exhibit showing the financial gains and losses for calendar years 2014 – 2019 for the following categories: Member months, total administrative expenses, total incurred claims, total premium, total actual paid taxes and fees, profit, annual underwriting gain/loss and underwriting gain/loss pmpy.

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

19. Per the Department's published guidance, the Benefit Richness factors in Table 10 Column L should be developed based upon the following formula: (Plan Pricing AV in column K * CSR Defunding Adjustment in column P)^2 - (Plan Pricing AV in column K * CSR Defunding Adjustment in column P) + 1.24. Further, the value developed by the quadratic formula must then be multiplied by a normalization constant such that the value in Cell L15 or L16 balances back to 1.000. Please modify the cells in Column L to explicitly show the quadratic formula and normalizing constant to demonstrate compliance with our guidance.

The calculation of the MLR is shown on Tab Q19 of the "QCC Small Group Response to June 16 Obj" excel worksheet. This shows that we followed the department's guidance. The normalization requires two levels of calculation that could not simply be demonstrated in the cells in Column L. We calculated factors by plan based on the formula, then divided each result by the weighted average to normalize Cells L15 and L16 to 1.000 while maintaining the relativities between each plan's factors. We have copied the resulting formulas into Table 10.

20. Section 4.3 of the 2021 URR Instructions requires issuers to discuss the reason for rate increase(s): Issuers must provide the quantitative impact and a narrative description of all significant factors driving the proposed rate increase. As an example, these factors could include:

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

We have added this information to the URRT Part III.

21. If the requested rate increase is not the same across all products and plans, provide an explanation as to why the rate changes vary by product or plan given they are based on the same single risk pool of experience for the market. Explain how the impact of morbidity was removed from impacting the variance in rate changes across products or plans.

Cover Letter - Responses to June 16 Objection Letter – QCC Small Group INAC-132358831
Response Date June 30, 2020

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

22. In Table 2, please update the risk adjustment amount to reflect the risk adjustment transfer shared by the Department on May 23, 2020 from Jim Lavery.

Please see our response to questions 2 and 3 which also address this question.

23. Please provide by service category the emerging data and resulting trend for the current calendar year to-date as of the end of May.

We will address this question in the response to the COVID-19 survey that is due back to the PID on July 8th.

24. Regarding Trend:

- a. Was the data in Table 4 utilized in developing the proposed trend?**
- b. Is the data in Table 4 raw unadjusted data or has it been normalized or otherwise adjusted? If the data has been adjusted, please provide an exhibit that quantitatively shows the unadjusted allowed monthly data for the 48 months. Also include the following monthly data:**
 - i. The average age factor;**
 - ii. The average geographic factor;**
 - iii. The average tobacco factor; and**
 - iv. The average benefit factor;**
 - v. The normalized average pmpm (should match the allowed pmpms in column L of Table 4).**

The data in Table 4 was not adjusted.

25. Cell D16 of Table 5 should contain a formula, specifically the product of the 1.01 factor to reflect the repeal of the individual mandate and any other assumption that produces the amount shown in that cell. Please revise; I note that the formula could be as simple as 1.01×1 .

We have entered the formula “1.01*1” in this cell.

26. Regarding Table 6:

- a. Please provide the proposed commission schedules for 2021.**
- b. Using the proposed commission schedules, quantitatively show the development of the percent and pmpm amounts in cells C51 and D51.**
- c. Using the 2019 SHCE in the Annual Statement, please quantitatively show the development of the Quality Improvement Initiatives percent and pmpm amount.**

The 2021 Commissions schedule is still be finalized; we will provide when it is available.

CMS allows a safe harbor in the MLR formula using 0.8% of earned premium for Quality Improvement Initiatives. We are using the 0.8% of our premium in our rating to be consistent with the safe harbor provision in the MLR formula.

d. We have repurposed row 54 to capture RA User Fees. Please provide the RA User Fee percentage and pmpm amount in cells C54 and D54.

We entered those values in our submission and updated the cells as noted in our response to Q15.

- 27. Please provide an exhibit that shows, by HIOS Plan ID, summary benefit and cost sharing changes for 2021 relative to the 2020 design for all plans to be offered in 2021. Include Pricing AV columns for 2020 and 2021. Please show the approved 2020 Pricing AVs for all plans in the 2020 column and the proposed 2021 Pricing AVs in the 2021 column. Also provide a supporting worksheet that shows the quantitative development of the proposed factors.**

This is shown on Tab Q27 of the “QCC Small Group Response June 16 Obj” excel worksheet.

- 28. Please provide an exhibit that quantitatively shows a comparison of the actual to projected claim cost pmpms for calendar years 2015 – 2019, as applicable.**

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

QCC Small Group

Metal	BMMO	PLRS	ARF	GCF	IDF	AV	Product w Risk	Product w/o Risk	
Plat	249,768	1.826	1.493		1.002	1.150	0.900	2.105	1.549
Gold	294,936	1.394	1.490		1.002	1.080	0.800	1.509	1.291
Silver	212,748	1.218	1.516		1.002	1.030	0.700	1.258	1.095
Bronze	148,356	1.063	1.589		1.002	1.000	0.600	1.066	0.956
Total	905,808	1.418	1.513		1.002	1.074	0.771	1.542	1.261
Check to AM	TRUE		TRUE						
Est. StateWide Average		1.390	\$ 443.93	1.50	1.00	1.079	0.787	1.499	1.277

15.65

Entity	Segment	2017	2018	2019	2020
Comml QCC - SG 2-50					
	Inpatient	3.7%	3.0%	3.6%	4.8%
	Outpatient	2.5%	2.5%	3.2%	3.9%
	Professional	1.3%	1.7%	1.7%	2.2%
	Total	2.4%	2.3%	2.7%	3.4%

Age	Age Factor	Feb-19 Members	2019 Members	Feb-20 Members	Tobacco Factor	Projected Use
0-14	0.765	11,677	12,139	12,151	0	0.00
15	0.833	1,043	1,036	992	0	0.00
16	0.859	1,010	1,066	1,109	0	0.00
17	0.885	1,068	1,057	1,068	0	0.00
18	0.913	1,096	1,143	1,101	0	0.00
19	0.941	1,129	1,135	1,156	0	0.00
20	0.970	1,186	1,173	1,183	0	0.00
21	1.000	1,093	1,163	1,213	0.125	0.018
22	1.000	1,192	1,200	1,159	0.125	0.018
23	1.000	1,146	1,152	1,210	0.125	0.018
24	1.000	1,126	1,151	1,163	0.125	0.018
25	1.004	1,074	1,115	1,236	0.125	0.018
26	1.024	974	985	1,072	0.125	0.018
27	1.048	1,016	1,067	1,084	0.125	0.018
28	1.087	1,072	1,118	1,146	0.125	0.018
29	1.119	1,035	1,103	1,221	0.125	0.018
30	1.135	1,120	1,152	1,162	0.175	0.018
31	1.159	1,071	1,144	1,290	0.175	0.018
32	1.183	1,094	1,151	1,214	0.175	0.018
33	1.198	1,110	1,138	1,203	0.175	0.018
34	1.214	1,089	1,122	1,248	0.175	0.018
35	1.222	1,071	1,110	1,157	0.175	0.018
36	1.230	1,041	1,076	1,158	0.175	0.018
37	1.238	1,028	1,073	1,109	0.175	0.018
38	1.246	1,068	1,087	1,139	0.175	0.018
39	1.262	1,044	1,058	1,117	0.175	0.018
40	1.278	1,032	1,059	1,124	0.225	0.037
41	1.302	995	1,053	1,136	0.225	0.037
42	1.325	953	983	1,075	0.225	0.037
43	1.357	924	965	1,015	0.225	0.037
44	1.397	1,022	1,023	1,017	0.225	0.037
45	1.444	1,009	1,054	1,088	0.225	0.037
46	1.500	1,012	1,019	1,085	0.225	0.037
47	1.563	1,082	1,084	1,037	0.225	0.037
48	1.635	1,230	1,220	1,164	0.225	0.037
49	1.706	1,208	1,272	1,272	0.225	0.037
50	1.786	1,323	1,330	1,288	0.375	0.037
51	1.865	1,319	1,335	1,408	0.375	0.037
52	1.952	1,355	1,351	1,349	0.375	0.037
53	2.040	1,359	1,382	1,374	0.375	0.037
54	2.135	1,369	1,411	1,414	0.375	0.037
55	2.230	1,472	1,493	1,426	0.375	0.037
56	2.333	1,416	1,439	1,542	0.375	0.037
57	2.437	1,412	1,472	1,486	0.375	0.037
58	2.548	1,589	1,574	1,529	0.375	0.037
59	2.603	1,464	1,481	1,668	0.375	0.037
60	2.714	1,397	1,404	1,492	0.375	0.037
61	2.810	1,382	1,436	1,428	0.375	0.037
62	2.873	1,449	1,439	1,425	0.375	0.037
63	2.952	1,351	1,404	1,464	0.375	0.037
64+	3.000	2,723	2,520	3,114	0.375	0.037
Avg Age		1.512	1.503	1.513		
Tobacco Factor				1.006		

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

	QCC Small Group
Projected Claims PMPM (After Reinsurance)	\$ 517.56
Premium PMPM	\$ 639.68
Quality Improvement Expense PMPM	\$ 5.12
Exchange User Fee PMPM	\$ -
HIF PMPM	\$ -
Federal Income Tax PMPM	\$ 2.69
Premium Tax PMPM	\$ 12.79
Federal MLR	83.7%

HIOS ID	Q1 Rate Change	Q2 Rate Change	Q3 Rate Change	Q4 Rate Change	February 2020 Renewal Membership				Average Rate Change
					1/1/2021	4/1/2021	7/1/2021	10/1/2021	
31609PA0150025	-0.04%	4.38%	5.35%	6.33%	3,071	1,822	913	1,528	3.06%
31609PA0150026	-0.04%	4.38%	5.35%	6.33%	4,814	2,737	2,284	2,579	3.25%
31609PA0150027	0.05%	4.48%	5.45%	6.43%	5,706	2,911	2,419	3,672	3.41%
31609PA0150028	-0.22%	4.20%	5.16%	6.14%	614	661	323	400	3.39%
31609PA0150029	-0.11%	4.30%	5.27%	6.25%	1,170	557	524	502	2.96%
31609PA0150030	0.33%	4.76%	5.74%	6.72%	646	162	178	80	2.38%
31609PA0150031	0.24%	4.67%	5.64%	6.62%	449	221	147	144	3.04%
31609PA0150032	0.33%	4.77%	5.74%	6.72%	663	448	428	444	3.93%
31609PA0150034	0.16%	4.59%	5.56%	6.54%	332	281	159	226	3.71%
31609PA0150035	0.04%	4.46%	5.43%	6.41%	481	289	347	500	3.96%
31609PA0150036	-0.24%	4.18%	5.14%	6.11%	2,628	1,269	1,663	2,515	3.54%
31609PA0150037	-0.06%	4.37%	5.33%	6.31%	1,612	901	663	1,112	3.36%
31609PA0150039	-1.20%	3.17%	4.12%	5.09%	282	218	147	139	2.12%
31609PA0150047	-1.11%	3.26%	4.22%	5.19%	1,381	765	628	1,368	2.58%
31609PA0150048	-0.72%	3.68%	4.64%	5.61%	742	452	324	469	2.65%
31609PA0150049	-0.47%	3.93%	4.90%	5.87%	1,325	612	578	932	2.93%
31609PA0150050	-0.77%	3.62%	4.58%	5.55%	2,349	1,201	1,023	1,309	2.46%
31609PA0170001	0.13%	4.56%	5.52%	6.51%	365	143	189	187	3.35%
Total	-0.18%	4.23%	5.19%	6.14%	28,630	15,650	12,937	18,106	3.18%

Location In Table 10 of AM Exhibit

Column B	Column W	Column K	Column P	Column L		Revised Formula		
HIOS ID	Membership	Pricing AV	CSR Load	Raw Induced Demand Factor	Normalized Induced Demand Factor	Normalized Induced Demand Factor	Difference	
31609PA0150025	7,334	0.939	1.000	1.183	1.103	1.103	0.000	
31609PA0150026	12,414	0.911	1.000	1.159	1.082	1.082	0.000	
31609PA0150027	14,708	0.788	1.000	1.073	1.001	1.001	0.000	
31609PA0150028	1,998	0.776	1.000	1.066	0.995	0.995	0.000	
31609PA0150029	2,753	0.665	1.000	1.017	0.949	0.949	0.000	
31609PA0150030	1,066	0.850	1.000	1.113	1.038	1.038	0.000	
31609PA0150031	961	0.749	1.000	1.052	0.981	0.981	0.000	
31609PA0150032	1,983	0.833	1.000	1.101	1.027	1.027	0.000	
31609PA0150033	161	0.715	1.000	1.036	0.967	0.967	0.000	
31609PA0150034	998	0.662	1.000	1.016	0.948	0.948	0.000	
31609PA0150035	1,617	0.715	1.000	1.036	0.967	0.967	0.000	
31609PA0150036	8,075	0.510	1.000	0.990	0.924	0.924	0.000	
31609PA0150037	4,288	0.549	1.000	0.992	0.926	0.926	0.000	
31609PA0150039	786	0.771	1.000	1.064	0.992	0.992	0.000	
31609PA0150047	4,142	0.770	1.000	1.063	0.992	0.992	0.000	
31609PA0150048	1,987	0.582	1.000	0.997	0.930	0.930	0.000	
31609PA0150049	3,447	0.598	1.000	1.000	0.933	0.933	0.000	
31609PA0150050	5,882	0.714	1.000	1.036	0.966	0.966	0.000	
31609PA0170001	884	0.647	1.000	1.012	0.944	0.944	0.000	
Total	75,484	0.750	1.000	1.072	1.000	1.000		

			2020 Pricing AV	2021 Pricing AV
31609PA0150025	PPO	Personal Choice PPO Platinum Preferred \$10/\$20/\$150 E	0.935	0.939
31609PA0150026	PPO	Personal Choice PPO Platinum Preferred \$20/\$40/\$150 E	0.924	0.911
31609PA0150027	PPO	Personal Choice PPO Gold Preferred \$35/\$70/\$600 E	0.853	0.788
31609PA0150028	PPO	Personal Choice PPO Gold Classic \$1,500/\$15/\$30/80% E	0.774	0.776
31609PA0150029	PPO	Personal Choice PPO Silver Classic \$3,250/\$30/\$60/70% E	0.732	0.665
31609PA0150030	PPO	Personal Choice PPO Platinum HSA-50 \$1,600/100% E	0.906	0.850
31609PA0150031	PPO	Personal Choice PPO Gold HSA-25 \$2,400/90% E	0.819	0.749
31609PA0150032	PPO	Personal Choice PPO Gold HSA-0 \$1,900/100% E	0.822	0.833
31609PA0150034	PPO	Personal Choice PPO Silver HSA-0 \$2,100/70% E	0.761	0.662
31609PA0150035	PPO	Personal Choice PPO Silver HSA-0 \$2,700/90% E	0.755	0.715
31609PA0150036	PPO	Personal Choice PPO Bronze HSA-0 \$5,200/50% E	0.622	0.510
31609PA0150037	PPO	Personal Choice PPO Bronze HSA-0 \$6,750/100% E	0.626	0.549
31609PA0150039	PPO	Personal Choice PPO Gold HRA-25 \$3,200/100% E	0.811	0.771
31609PA0150047	PPO	Personal Choice PPO Gold Classic \$2,500 \$40/\$80/100% E	0.812	0.770
31609PA0150048	PPO	Personal Choice PPO Silver Classic \$4,750/\$50/\$100/90 E	0.742	0.582
31609PA0150049	PPO	Personal Choice PPO Silver Secure \$4,500/\$35/\$70/\$60 E	0.728	0.598
31609PA0150050	PPO	Personal Choice PPO Silver HSA-0 \$3,200/100% E	0.760	0.714
31609PA0170001	EPO	Personal Choice EPO Silver HSA-0 \$3,000/80% E	0.722	0.647

Cover Letter for Responses to July 8 Objection Letter – QCC Small Group INAC-132358831
Response Date July 20, 2020

- 1. The response to Question 1 of the first round of questions indicates that the URRT has been updated to reflect the proposed rate changes for this filing. However, the rate changes are still inconsistent between the cover letter/rate change request summary, the Part III Actuarial Memorandum, the Pennsylvania Actuarial Memorandum, and the URRT. Please explain these discrepancies.**

We have updated these components to be consistent. The average increase shows the value from Cell AC15 of Table 10 in the AM Exhibit. The range of rate changes comes from Column AC of Table 10 where plans are listed as “Existing”. We note that the URRT may calculate the average increase differently than Table 10.

- 2. The ‘Q3’ tab of the file “QCC Small Group Response to June 16 Obj.xlsx” provides a numerical development of the projected 2021 risk adjustment transfer PMPM. Please provide this same exhibit for the calculation of the expected 2019 risk adjustment transfer PMPM. Additionally, please support any significant differences in the components of the risk adjustment calculation between 2019 and 2021 on an issuer and/or statewide basis.**

We have updated 2019 risk adjustment with the amounts published in the “Summary Report on Permanent Risk Adjustment Transfers for the 2019 Benefit Year” released July 17, 2020.

- 3. We have the following additional questions regarding trend.**
 - a. The response to Question 4a of the first round of questions indicates that the proposed one-year trend from 2020 to 2021 is 8.9%, while the annual trend applied to the experience period data to develop the projected period claims is 6.2%. Please identify the 2019 to 2020 trend used in conjunction with the 8.9% trend from 2020 to 2021 to develop the 6.2% overall annual trend from 2019 to 2021.**

Cell G52 of Table 3 of the AM Exhibit shows that the trend from 2019 to 2021 was 12.06%. The 8.9% we used in the URRT Part II and the Rate Change Request Summary is intended to be more moderate over both the QCC and KHPE populations. The 8.9% is between the trend from this filing and our KHPE filing. Our customers can consider plans sold by either entity within our family of companies which is why an overall value is stated.

- b. If the assumed 2020 to 2021 trend is 8.9% but the annual trend from 2019 to 2021 is 6.2%, the assumed 2019 to 2020 trend must be less than 6.2% (e.g., 3.2%). Therefore, please provide support for assuming an 8.9% trend from 2020 to 2021 when the estimated 2019 to 2020 trend is significantly less than 8.9%.**

As noted above, the trend from 2019 to 2021 was 12.06%. Removing the 8.9% from that result leaves a one year trend of 15.3%.

- c. Please confirm that the trends provided in the ‘Q4b’ tab of the file “QCC Small Group Response to June 16 Obj.xlsx” shows actual observed historical trends from 2017 to 2020 YTD.**

We received these trends from our Trend actuary, they represent the unit cost trends for the time periods in question.

Additionally, please provide the following information:

- i. Please include pharmacy trends in this exhibit.**

Cover Letter for Responses to July 8 Objection Letter – QCC Small Group INAC-132358831
Response Date July 20, 2020

We have added the additional information.

ii. Please clarify the source of the data which was used in developing the historical trend information provided in the ‘Q4b’ tab.

We received these trends from our Trend actuary, they represent the unit cost trends for the time periods in question.

iii. Please provide the following detail which underlies the calculated historical trends provided in the ‘Q4b’ tab: total member months, allowed claims, and any normalization adjustments that were applied to the claims experience for each year from 2017 through 2020 YTD for each benefit category.

d. The actual observed historical trends included in the ‘Q4b’ tab of the file “QCC Small Group Response to June 16 Obj.xlsx” are significantly lower than those included in the URRT. Please explain and support the use of trends for pricing that are significantly higher than those experienced historically.

As noted in the response above, we have provided the Unit cost trends as that is what we have available. The pricing trend is made up of unit cost, utilization and pharmacy.

4. The Q5&6’ tab of the file “QCC Small Group Response to June 16 Obj.xlsx” includes #DIV/0! Errors due to the lack of Feb 2019 and Feb 2020 membership data. Please correct this exhibit.

We have corrected the links from the source file used to create this exhibit; it is now found in Tab Q4 in the attachment to this response letter.

5. Please explain how the Projected Use factors included in the ‘Q5&6’ tab of the file “QCC Small Group Response to June 16 Obj.xlsx” are developed.

We continued the assumptions for Tobacco use that were used in prior rate filings.

6. Please provide an exhibit which compares the average 2021 pricing AV’s by metal level (including the CSR adjustment for silver plans; excluding any induced utilization adjustments) to the actual observed 2019 paid-to-allowed ratios by metal level. To the extent the pricing AV’s are significantly different than the actual observed experience for a particular metal level, please explain and justify why the proposed pricing AV’s are appropriate.

The data is shown on tab Q6 of the attached spreadsheet.

The Pricing AVs will differ from the observed paid-to-allowed ratios due to actual induced demand as well as health status. These factors will show up in the actual claims but will not appear in the pricing AVs since we are not allowed to price for them.

For example, if healthier members choose bronze plans, hospital utilization on Bronze will be lower than average, so the impact of this may lead to a higher paid to allowed than the pricing AV. The pricing AV considers the utilization of an average member when determining rates.

7. The response to Question 8b indicates that a 6.5% trend from 2021 to 2020 was used to develop the 1.6% quarterly trend factor. Please explain how this trend was chosen and support it,

particularly given that it is inconsistent with the specified average annual trend rate(s) underlying the URRT (i.e., 6.2% from 2019 to 2021 and 8.9% from 2020 to 2021).

Our response stated it was an estimate for trend going from 2021 to 2022, not from 2020 to 2021. This is intended to be a representative estimate for trend from 2021 to 2022.

- 8. The response to Question 11 of the first round of questions indicates that IBC is working to provide the information in a subsequent response. Please indicate when we can expect to receive this response.**

Revisions we have made to the AM Exhibits have reduced the differences appearing in the earlier version.

- 9. The Risk Adjustment User Fee included in the PA Rate template was updated based on the response to Question 15 of the first round of questions. However, the URRT does not appear to have been updated for the revised taxes and fees. Please update the URRT, and any other documentation as necessary. Please provide a list of all documentation that changes as a result of this adjustment.**

We had not incorporated the change to the Risk Adjustment User Fee into the URRT yet because of its minor impact; we expected to have to make more material changes later on in the review process, such as the COVID impact, and have included it with this response.

- 10. The response to Question 21 of the first round of questions does not seem consistent with the question. Please revise as appropriate.**

There are two significant factors that result in rate increases not being the same across all plans. First, benefit changes were made to ensure that each plan's Metal AV as determined by the AV Calculator comply with CMS requirements. Second, revising the Induced Demand factors per the PID direction affected each plan differently, since the Induced Demand factor is calculated using a function dependent on each plan's Pricing AV. Some of the Induced Demand factors by plan are significantly different than those used in 2020 pricing, resulting in very different impacts on rates.

- 11. Please update the 2019 experience period risk adjustment amount in Table 2 to reflect the department calculated revised risk adjustment transfer amount sent to your company on June 30th 2020, or the final CMS transfer amount published on or before July 16th, if it differs from the Department's calculation.**

We have updated 2019 risk adjustment with the amounts published in the "Summary Report on Permanent Risk Adjustment Transfers for the 2019 Benefit Year" released July 17, 2020.

- 12. If the projected risk adjustment transfer amount in Table 5 will be modified due to either the June 30th revisions or the final CMS transfer amount published on or before July 16th if it differs from the Department's calculation, please provide narrative and detailed supporting data to justify the proposed changes.**
- 13. Response #19 indicates that formulas have been entered in Column L of Table 10; presumably these formulas would consist of a calculation involving the data in Column K adjusted by a constant derived in in Tab Q19. Hard coded numbers are entered in Column L; please revise.**

Cover Letter for Responses to July 8 Objection Letter – QCC Small Group INAC-132358831
Response Date July 20, 2020

We created the file with formulas as you requested; however, when we finalized the exhibit for uploading we inadvertently range valued these cells. We have revised the cells to show the formulas. We need to range value parts of the spreadsheet because they link to other sheets and you would not be able to review them if we kept the links intact.

14. On July 13th the Department will communicate its guidance based upon updated survey information from the issuers on their best estimate of the Covid-19 impact on 2021 rates. Responses to the round two questions are due on July 16th; please be sure that all documents submitted via SERFF on or after that date reflect the impact of Covid-19 and are consistent with Department's July 13th guidance.

15. 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 Rates Template are identical.

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

16. Please submit an amendment to update the Company Rate Information under the Rate/Rule Schedule tab if any information has changed since the initial filing.

The Company Rate Information will be updated via a Post-Submission Update after this response letter and other components have been submitted in SERFF.

17. Please ensure that the 7/16/20 versions of the following items are posted in SERFF with your July 16th response to this data call: The data requested in Item 18 of the Department's June 16 letter was requested of all carriers. Please provide the requested information.

As noted in our previous response, this information is not readily available and not something that we believe that we can share since it does not impact the setting of rates for 2021. We look forward to reviewing the responses from the other carriers if they choose to provide them. We would note that we were the only carrier in Rating area 8 prior to 2019 so none of our direct competitors would be able to produce this exhibit either we believe.

18. The data requested in Item 28 of the Department's June 16 letter was requested of all carriers. Please provide the requested information.

As noted in our previous response, this information is not readily available and not something that we believe that we can share since it does not impact the setting of rates for 2021. We look forward to reviewing the responses from the other carriers if they choose to provide them. We would note that we were the only carrier in Rating area 8 prior to 2019 so none of our direct competitors would be able to produce this exhibit either we believe.

- **Cover letter identifying all changes made and the reason for the change. Also show the revised rate change.**
- **PA Actuarial Memorandum**
- **PA Actuarial Memorandum Exhibits**
- **Departments Plan Design Summary and Rate Template Exhibits (please ensure that the rate template by county is populated with only numeric values – no “NA”)**
- **URRT**
- **Federal rates template**

Cover Letter for Responses to July 8 Objection Letter – QCC Small Group INAC-132358831
Response Date July 20, 2020

- **Part III actuarial memorandum**
- **Updated Rate Change Request Summary (Attachment 1)**
- **Public filing pdf with limited redactions as previously directed in the Guidance (includes all correspondence and supporting exhibits subsequent to the initial submission, in addition to all of the above items).**

Age	Age Factor	Feb-19 Members	2019 Members	Feb-20 Members	Tobacco Factor	Projected Use
0-14	0.765	11,677	12,139	12,151	0	0.00
15	0.833	1,043	1,036	992	0	0.00
16	0.859	1,010	1,066	1,109	0	0.00
17	0.885	1,068	1,057	1,068	0	0.00
18	0.913	1,096	1,143	1,101	0	0.00
19	0.941	1,129	1,135	1,156	0	0.00
20	0.970	1,186	1,173	1,183	0	0.00
21	1.000	1,093	1,163	1,213	0.125	0.018
22	1.000	1,192	1,200	1,159	0.125	0.018
23	1.000	1,146	1,152	1,210	0.125	0.018
24	1.000	1,126	1,151	1,163	0.125	0.018
25	1.004	1,074	1,115	1,236	0.125	0.018
26	1.024	974	985	1,072	0.125	0.018
27	1.048	1,016	1,067	1,084	0.125	0.018
28	1.087	1,072	1,118	1,146	0.125	0.018
29	1.119	1,035	1,103	1,221	0.125	0.018
30	1.135	1,120	1,152	1,162	0.175	0.018
31	1.159	1,071	1,144	1,290	0.175	0.018
32	1.183	1,094	1,151	1,214	0.175	0.018
33	1.198	1,110	1,138	1,203	0.175	0.018
34	1.214	1,089	1,122	1,248	0.175	0.018
35	1.222	1,071	1,110	1,157	0.175	0.018
36	1.230	1,041	1,076	1,158	0.175	0.018
37	1.238	1,028	1,073	1,109	0.175	0.018
38	1.246	1,068	1,087	1,139	0.175	0.018
39	1.262	1,044	1,058	1,117	0.175	0.018
40	1.278	1,032	1,059	1,124	0.225	0.037
41	1.302	995	1,053	1,136	0.225	0.037
42	1.325	953	983	1,075	0.225	0.037
43	1.357	924	965	1,015	0.225	0.037
44	1.397	1,022	1,023	1,017	0.225	0.037
45	1.444	1,009	1,054	1,088	0.225	0.037
46	1.500	1,012	1,019	1,085	0.225	0.037
47	1.563	1,082	1,084	1,037	0.225	0.037
48	1.635	1,230	1,220	1,164	0.225	0.037
49	1.706	1,208	1,272	1,272	0.225	0.037
50	1.786	1,323	1,330	1,288	0.375	0.037
51	1.865	1,319	1,335	1,408	0.375	0.037
52	1.952	1,355	1,351	1,349	0.375	0.037
53	2.040	1,359	1,382	1,374	0.375	0.037
54	2.135	1,369	1,411	1,414	0.375	0.037
55	2.230	1,472	1,493	1,426	0.375	0.037
56	2.333	1,416	1,439	1,542	0.375	0.037
57	2.437	1,412	1,472	1,486	0.375	0.037
58	2.548	1,589	1,574	1,529	0.375	0.037
59	2.603	1,464	1,481	1,668	0.375	0.037
60	2.714	1,397	1,404	1,492	0.375	0.037
61	2.810	1,382	1,436	1,428	0.375	0.037
62	2.873	1,449	1,439	1,425	0.375	0.037
63	2.952	1,351	1,404	1,464	0.375	0.037
64+	3.000	2,723	2,520	3,114	0.375	0.037
Avg Age		1.512	1.503	1.513		
Tobacco Factor				1.006		

Entity	Segment	2017	2018	2019	2020
Comml QCC - SG 2-50					
	Inpatient	3.7%	3.0%	3.6%	4.8%
	Outpatient	2.5%	2.5%	3.2%	3.9%
	Professional	1.3%	1.7%	1.7%	2.2%
	Total Medical	2.4%	2.3%	2.7%	3.4%
	Drug Ingredient Cost	4.4%	5.7%	3.4%	6.8%

HIOS ID	2021 Pricing AV	2021 CSR Factor	Combined	2019 Paid to Allowed
31609PA0150025	0.939	1.000	0.939	0.909
31609PA0150026	0.911	1.000	0.911	0.899
31609PA0150027	0.788	1.000	0.788	0.846
31609PA0150028	0.776	1.000	0.776	0.816
31609PA0150029	0.665	1.000	0.665	0.724
31609PA0150030	0.850	1.000	0.850	0.854
31609PA0150031	0.749	1.000	0.749	0.768
31609PA0150032	0.833	1.000	0.833	0.823
31609PA0150034	0.662	1.000	0.662	0.689
31609PA0150035	0.715	1.000	0.715	0.760
31609PA0150036	0.510	1.000	0.510	0.648
31609PA0150037	0.549	1.000	0.549	0.665
31609PA0150039	0.771	1.000	0.771	0.789
31609PA0150047	0.770	1.000	0.770	0.829
31609PA0150048	0.582	1.000	0.582	0.727
31609PA0150049	0.598	1.000	0.598	0.742
31609PA0150050	0.714	1.000	0.714	0.759
31609PA0170001	0.647	1.000	0.647	0.668

Completeness and Redaction Justification Checklist

Instructions for Completion and Redaction Justification Checklist

This checklist is required for all issuers submitting ACA-Compliant rates for 2020 comprehensive major medical rate filings and should be submitted, as supporting documentation, with each 2020 ACA-Compliant comprehensive major medical rate filing. The checklist is organized by heading, section and subsection as outlined in the Draft 2020 ACA-Compliant Health Insurance Rate Filing Guidance (Guidance) released on March 8, 2019.

"Completed" Column

The first input column is labeled "Completed". In order for the filing to be considered complete and ready for department review, X must appear in each field in the column, except where data tables are marked "if applicable". The X indicates that the actuary has read the Guidance and has provided the requested information and data, as required in the PA Actuarial Memorandum and Rate Exhibits and further, that the data templates are completely and appropriately populated.

"Redaction Justification" Columns

The "Redaction Justification" section contains three columns. If the issuer's filing contains redacted information or data in the named section, "Y" must be populated in the "Redacted" column.

Each issuer must submit a "Public Rate Filing PDF" with the initial filing and with the final version that will be approved. The PDF document must contain all required documents, tables and exhibits. If the issuers chooses to make the limited redactions anticipated by the Department, those redactions should be made only in this document. The "Page # in Public PDF" section should reference the page number of the Public Rate Filing PDF where the redacted information and/or data can be located.

If any information is redacted, a justification must be submitted that specifically justifies why that information should be redacted. Correspondingly, the "Justification" column should be populated with a "Y" in any rows where it is indicated that information is redacted, and with an "NA" if information is not redacted. To reiterate the redaction criteria contained in the Guidance, only information that is trade secret or confidential commercial or financial information as defined in HHS's Freedom of Information Act (FOIA) regulations at 45 CFR§ 5.65 may be redacted.

Consistent with prior, the Department does not anticipate redactions other than the following items:

1. AV screenshots
2. Statements specifying a company's anticipated risk level in relation to the state average risk level (e.g., the underlined portion could be redacted in the following statement: "we expect the risk level of membership to be X% higher/lower than the state average risk level")
3. Opining actuary's name
4. Specific provider contracting information (note: such information was not submitted in prior rate filings and the department does not anticipate receiving such information in plan year 2019 rate filings)
5. Commission schedules

Please remain cognizant that non-redacted information and data must be submitted for review.

You may contact Tracie Gray at tgray@pa.gov if you have any questions regarding this checklist.

Completeness and Redaction Justification Checklist

Issuer Name: QCC Insurance Company, Inc.
 Market: Small Group PPO
 SERFF ID: INAC-132358831

TOC #	Description	Completed (Mark with "X")	Redaction Justification		
			Redacted (Y/N)	Page # in Public PDF	Justification submitted (Y/NA)
Federal Documents Required to Be Filed with PID					
A.2.	RFJ Part I - Unified Rate Review Template	X			
	RFJ Part II – Consumer Friendly Justification	X			
	RFJ Part III – Actuarial Memorandum	X	Y	37-44	Y
	Federal Rates Template	X			
Summary Documents/Confirmation of HIOS & SERFF Submissions					
A.2.B.	HIOS Submission	X			
A.2.C.	SERFF Submission	X			
A.2.D.	SERFF Rate/Rule Schedule Tab	X			
B.	Cover Letter & PA Bulletin Information	X			
C.	Rate Change Request Summary	X			
PA Actuarial Memorandum and Rate Exhibits					
D.1.A.	Company Information	X	Y	7	Y
D.1.B.	Rate History & Proposed Variation in Rate Changes	X	N	8	N/A
D.1.C.	Average Rate Change	X	N	8	N/A
D.1.D.	Membership Count	X	N	8	N/A
	PA Act. Exhibits Table 1	X	N	15	N/A
D.1.E.	Benefit Changes	X	N	8	N/A
D.1.F.	Experience Period Claims & Premium	X	N	8-9	N/A
	PA Act. Exhibits Table 2	X	N	15	N/A
D.1.G.	Credibility of Data	X	N	9-10	N/A
	PA Act. Exhibits Tables 2b, 3b, 4b (if applicable)	X	N	N/A	N/A
D.1.H.	Trend Identification	X	N	10	N/A
	PA Act. Exhibits Table 3	X	N	15	N/A
D.1.I.	Historical Experience	X	N	10	N/A
	PA Act. Exhibits Table 4	X	N	15	N/A
D.2.A.	Development of PAIR, MAIR and Total Allowed Claims	X	N	10-11	N/A
	PA Act. Exhibits Table 5	X	N	16	N/A
D.2.B.	Retention Items	X	N	11-12	N/A
	PA Act. Exhibits Table 6	X	N	16	N/A
D.2.C.	Normalized Market-Adjusted Projected Allowed Total Claims	X	N	12	N/A
	PA Act. Exhibits Table 7	X	N	16	N/A
D.2.D.	Components of Rate Change	X	N	12	N/A
	PA Act. Exhibits Table 8	X	N	16	N/A
	PA Act. Exhibits Table 9	X	N	16	N/A
D.3.	Plan Rate Development	X	N	12	N/A
	PA Act. Exhibits Table 10	X	N	17	N/A
D.4.	Plan Premium Development for 21-Year-Old Non-Tobacco User	X	N	13	N/A
	PA Act. Exhibits Table 11	X	N	18	N/A
D.5.A.	Age and Tobacco Factors	X	N	13	N/A
	PA Act. Exhibits Table 12	X	N	19	N/A
D.5.B.	Geographic Factors	X	N	13	N/A
	PA Act. Exhibits Table 13	X	N	19	N/A
D.5.C.	Network Factors	X	N	13	N/A
	PA Act. Exhibits Table 14	X	N	19	N/A
D.5.D.	Service Area Composition	X	N	13	N/A
D.5.E.	Composite Rating	X	N	13	N/A
D.6.	Actuarial Certifications	X	Y	13-14	Y
Additional Exhibits					
E.	Department Plan Design Summary & Rate Tables	X	N	20-31	N/A
	Service Area Map	X	N	67	N/A
Redaction Justification (must be submitted if any information is redacted)		X			Y