



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 7.8%
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 **8.9%**.

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
	35.8	35.8	35.8
Average Age	35.8	35.8	35.8
Total	877,473	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	59,511	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	\$ 305,471,900.09	877,473	89.88, 971.34	485,855,502.21		\$ 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)											\$
Less Reins											\$ 550.89
*Express Prescription Drug Rebates as a negative number											71.08%

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%	8.00%	0.00%	13.00%	0.00%
Capitated	0.00%	0.00%	0.00%	0.00%	0.00%
Prescription Drugs	0.00%	0.00%	7.00%	7.00%	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	\$	154,516.14	\$14.46
Feb-16	\$	30,166,054.88	1.000%	30,166,054.88	74,451	\$	403.10	\$	130,812.58	\$13.65
Mar-16	\$	34,451,207.66	1.000%	34,451,207.66	74,493	\$	462.46	\$	158,899.58	\$16.54
Apr-16	\$	31,699,954.60	1.000%	31,699,954.60	74,518	\$	425.07	\$	148,461.57	\$15.64
May-16	\$	31,422,885.51	1.000%	31,422,885.51	74,370	\$	408.44	\$	165,963.41	\$17.60
Jun-16	\$	36,772,484.34	1.000%	36,772,484.34	74,174	\$	484.86	\$	152,758.68	\$16.02
Jul-16	\$	30,719,702.17	1.000%	30,719,702.17	74,031	\$	414.36	\$	138,116.12	\$14.87
Aug-16	\$	33,638,693.97	1.000%	33,638,693.97	74,299	\$	451.56	\$	160,987.16	\$16.73
Sep-16	\$	31,839,731.28	1.000%	31,839,731.28	74,447	\$	424.36	\$	159,475.56	\$16.81
Oct-16	\$	32,411,436.36	1.000%	32,411,436.36	74,517	\$	434.18	\$	168,584.28	\$17.42
Nov-16	\$	34,687,449.36	1.000%	34,687,449.36	74,801	\$	463.67	\$	182,115.63	\$19.01
Dec-16	\$	31,597,432.56	1.000%	31,597,432.56	75,564	\$	424.34	\$	167,674.66	\$17.68
Jan-17	\$	31,589,749.77	1.000%	31,589,749.77	75,145	\$	420.38	\$	172,402.41	\$17.84
Feb-17	\$	30,189,379.68	1.000%	30,189,379.68	75,401	\$	401.24	\$	166,971.71	\$17.51
Mar-17	\$	36,102,587.71	1.000%	36,102,587.71	75,124	\$	486.56	\$	181,648.88	\$19.44
Apr-17	\$	32,108,986.71	1.000%	32,108,986.71	74,842	\$	388.36	\$	170,463.20	\$18.13
May-17	\$	34,343,315.77	1.000%	34,343,315.77	75,073	\$	457.47	\$	179,114.03	\$18.34
Jun-17	\$	31,626,439.51	1.000%	31,626,439.51	75,013	\$	406.07	\$	176,469.73	\$17.68
Jul-17	\$	31,367,366.76	1.000%	31,367,366.76	74,884	\$	414.86	\$	172,464.64	\$17.61
Aug-17	\$	32,871,958.77	1.000%	32,871,958.77	75,203	\$	437.14	\$	179,189.18	\$18.54
Sep-17	\$	29,975,528.71	1.000%	29,975,528.71	75,061	\$	399.35	\$	176,444.60	\$17.51
Oct-17	\$	31,807,728.98	1.000%	31,807,728.98	74,690	\$	405.08	\$	179,367.28	\$17.80
Nov-17	\$	34,256,460.68	1.000%	34,256,460.68	74,892	\$	464.70	\$	191,724.28	\$19.02
Dec-17	\$	30,526,716.06	1.000%	30,526,716.06	75,251	\$	416.14	\$	178,438.10	\$17.81
Jan-18	\$	30,756,049.35	1.000%	30,756,049.35	75,477	\$	430.20	\$	181,802.37	\$18.02
Feb-18	\$	29,651,374.96	1.000%	29,651,374.96	75,174	\$	406.24	\$	172,051.30	\$17.51
Mar-18	\$	29,248,588.66	1.000%	29,248,588.66	75,763	\$	414.86	\$	181,387.28	\$17.81
Apr-18	\$	29,281,845.89	1.000%	29,281,845.89	76,001	\$	420.11	\$	184,181.88	\$18.01
May-18	\$	31,248,832.42	1.000%	31,248,832.42	76,118	\$	451.11	\$	185,526.78	\$18.50
Jun-18	\$	28,111,076.92	1.000%	28,111,076.92	76,610	\$	368.60	\$	178,177.84	\$17.61
Jul-18	\$	28,148,189.78	1.000%	28,148,189.78	76,778	\$	414.86	\$	181,064.61	\$17.76
Aug-18	\$	31,750,863.77	1.000%	31,750,863.77	76,083	\$	438.00	\$	182,254.44	\$18.54
Sep-18	\$	28,013,157.83	1.000%	28,013,157.83	76,431	\$	403.61	\$	177,766.57	\$17.71
Oct-18	\$	31,312,064.96	1.000%	31,312,064.96	76,668	\$	478.44	\$	181,026.56	\$18.48
Nov-18	\$	32,647,070.34	1.000%	32,647,070.34	76,721	\$	459.42	\$	181,289.77	\$18.56
Dec-18	\$	29,406,172.89	1.000%	29,406,172.89	76,527	\$	415.77	\$	182,212.77	\$18.44
Jan-19	\$	32,409,524.02	0.999%	32,423,071.77	75,502	\$	455.46	\$	181,170.18	\$18.15
Feb-19	\$	29,881,380.61	0.999%	29,881,380.61	75,494	\$	418.97	\$	182,463.48	\$18.17
Mar-19	\$	32,867,143.78	0.999%	32,868,438.16	75,746	\$	455.00	\$	182,142.98	\$18.47
Apr-19	\$	31,972,775.39	0.998%	31,976,524.45	72,080	\$	440.82	\$	168,177.77	\$16.84
May-19	\$	32,355,618.05	0.997%	32,434,118.68	72,084	\$	440.26	\$	183,545.55	\$18.30
Jun-19	\$	28,924,777.65	0.996%	28,963,689.32	72,429	\$	414.01	\$	166,611.89	\$16.61
Jul-19	\$	31,316,484.41	0.991%	31,342,600.60	73,064	\$	428.06	\$	179,604.61	\$17.61
Aug-19	\$	32,935,101.05	0.999%	32,936,274.61	73,492	\$	452.24	\$	194,921.24	\$19.24
Sep-19	\$	30,713,081.52	0.981%	31,307,454.68	73,861	\$	428.36	\$	184,013.18	\$18.18
Oct-19	\$	36,416,908.84	0.973%	37,564,500.82	76,866	\$	506.06	\$	184,026.07	\$18.42
Nov-19	\$	31,261,136.14	0.969%	31,265,101.61	76,861	\$	426.70	\$	181,493.88	\$18.14
Dec-19	\$	31,939,430.77	0.939%	36,768,748.50	75,098	\$	480.81	\$	11,020,413.14	\$11.02

* 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
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[illegible]

Center Name:	CCC Insurance Company, Inc.
Headquarters:	1000
Market Segment:	General Insurance
Rate Effective Date:	5/1/2000

Title/Notes	1998 Plan (1998-1999)		1999 Plan (1999-2000)		2000 Plan (2000-2001)		2001 Plan (2001-2002)		2002 Plan (2002-2003)		2003 Plan (2003-2004)		2004 Plan (2004-2005)		2005 Plan (2005-2006)		2006 Plan (2006-2007)		2007 Plan (2007-2008)		2008 Plan (2008-2009)		2009 Plan (2009-2010)		2010 Plan (2010-2011)		2011 Plan (2011-2012)		2012 Plan (2012-2013)		2013 Plan (2013-2014)		2014 Plan (2014-2015)		2015 Plan (2015-2016)		2016 Plan (2016-2017)		2017 Plan (2017-2018)		2018 Plan (2018-2019)		2019 Plan (2019-2020)		2020 Plan (2020-2021)		2021 Plan (2021-2022)		2022 Plan (2022-2023)		2023 Plan (2023-2024)		2024 Plan (2024-2025)		2025 Plan (2025-2026)		2026 Plan (2026-2027)		2027 Plan (2027-2028)		2028 Plan (2028-2029)		2029 Plan (2029-2030)		2030 Plan (2030-2031)		2031 Plan (2031-2032)		2032 Plan (2032-2033)		2033 Plan (2033-2034)		2034 Plan (2034-2035)		2035 Plan (2035-2036)		2036 Plan (2036-2037)		2037 Plan (2037-2038)		2038 Plan (2038-2039)		2039 Plan (2039-2040)		2040 Plan (2040-2041)		2041 Plan (2041-2042)		2042 Plan (2042-2043)		2043 Plan (2043-2044)		2044 Plan (2044-2045)		2045 Plan (2045-2046)		2046 Plan (2046-2047)		2047 Plan (2047-2048)		2048 Plan (2048-2049)		2049 Plan (2049-2050)		2050 Plan (2050-2051)		2051 Plan (2051-2052)		2052 Plan (2052-2053)		2053 Plan (2053-2054)		2054 Plan (2054-2055)		2055 Plan (2055-2056)		2056 Plan (2056-2057)		2057 Plan (2057-2058)		2058 Plan (2058-2059)		2059 Plan (2059-2060)		2060 Plan (2060-2061)		2061 Plan (2061-2062)		2062 Plan (2062-2063)		2063 Plan (2063-2064)		2064 Plan (2064-2065)		2065 Plan (2065-2066)		2066 Plan (2066-2067)		2067 Plan (2067-2068)		2068 Plan (2068-2069)		2069 Plan (2069-2070)		2070 Plan (2070-2071)		2071 Plan (2071-2072)		2072 Plan (2072-2073)		2073 Plan (2073-2074)		2074 Plan (2074-2075)		2075 Plan (2075-2076)		2076 Plan (2076-2077)		2077 Plan (2077-2078)		2078 Plan (2078-2079)		2079 Plan (2079-2080)		2080 Plan (2080-2081)		2081 Plan (2081-2082)		2082 Plan (2082-2083)		2083 Plan (2083-2084)		2084 Plan (2084-2085)		2085 Plan (2085-2086)		2086 Plan (2086-2087)		2087 Plan (2087-2088)		2088 Plan (2088-2089)		2089 Plan (2089-2090)		2090 Plan (2090-2091)		2091 Plan (2091-2092)		2092 Plan (2092-2093)		2093 Plan (2093-2094)		2094 Plan (2094-2095)		2095 Plan (2095-2096)		2096 Plan (2096-2097)		2097 Plan (2097-2098)		2098 Plan (2098-2099)		2099 Plan (2099-2100)		2100 Plan (2100-2101)		2101 Plan (2101-2102)		2102 Plan (2102-2103)		2103 Plan (2103-2104)		2104 Plan (2104-2105)		2105 Plan (2105-2106)		2106 Plan (2106-2107)		2107 Plan (2107-2108)		2108 Plan (2108-2109)		2109 Plan (2109-2110)		2110 Plan (2110-2111)		2111 Plan (2111-2112)		2112 Plan (2112-2113)		2113 Plan (2113-2114)		2114 Plan (2114-2115)		2115 Plan (2115-2116)		2116 Plan (2116-2117)		2117 Plan (2117-2118)		2118 Plan (2118-2119)		2119 Plan (2119-2120)		2120 Plan (2120-2121)		2121 Plan (2121-2122)		2122 Plan (2122-2123)		2123 Plan (2123-2124)		2124 Plan (2124-2125)		2125 Plan (2125-2126)		2126 Plan (2126-2127)		2127 Plan (2127-2128)		2128 Plan (2128-2129)		2129 Plan (2129-2130)		2130 Plan (2130-2131)		2131 Plan (2131-2132)		2132 Plan (2132-2133)		2133 Plan (2133-2134)		2134 Plan (2134-2135)		2135 Plan (2135-2136)		2136 Plan (2136-2137)		2137 Plan (2137-2138)		2138 Plan (2138-2139)		2139 Plan (2139-2140)		2140 Plan (2140-2141)		2141 Plan (2141-2142)		2142 Plan (2142-2143)		2143 Plan (2143-2144)		2144 Plan (2144-2145)		2145 Plan (2145-2146)		2146 Plan (2146-2147)		2147 Plan (2147-2148)		2148 Plan (2148-2149)		2149 Plan (2149-2150)		2150 Plan (2150-2151)		2151 Plan (2151-2152)		2152 Plan (2152-2153)		2153 Plan (2153-2154)		2154 Plan (2154-2155)		2155 Plan (2155-2156)		2156 Plan (2156-2157)		2157 Plan (2157-2158)		2158 Plan (2158-2159)		2159 Plan (2159-2160)		2160 Plan (2160-2161)		2161 Plan (2161-2162)		2162 Plan (2162-2163)		2163 Plan (2163-2164)		2164 Plan (2164-2165)		2165 Plan (2165-2166)		2166 Plan (2166-2167)		2167 Plan (2167-2168)		2168 Plan (2168-2169)		2169 Plan (2169-2170)		2170 Plan (2170-2171)		2171 Plan (2171-2172)		2172 Plan (2172-2173)		2173 Plan (2173-2174)		2174 Plan (2174-2175)		2175 Plan (2175-2176)		2176 Plan (2176-2177)		2177 Plan (2177-2178)		2178 Plan (2178-2179)		2179 Plan (2179-2180)		2180 Plan (2180-2181)		2181 Plan (2181-2182)		2182 Plan (2182-2183)		2183 Plan (2183-2184)		2184 Plan (2184-2185)		2185 Plan (2185-2186)		2186 Plan (2186-2187)		2187 Plan (2187-2188)		2188 Plan (2188-2189)		2189 Plan (2189-2190)		2190 Plan (2190-2191)		2191 Plan (2191-2192)		2192 Plan (2192-2193)		2193 Plan (2193-2194)		2194 Plan (2194-2195)		2195 Plan (2195-2196)		2196 Plan (2196-2197)		2197 Plan (2197-2198)		2198 Plan (2198-2199)		2199 Plan (2199-2200)		2200 Plan (2200-2201)		2201 Plan (2201-2202)		2202 Plan (2202-2203)		2203 Plan (2203-2204)		2204 Plan (2204-2205)		2205 Plan (2205-2206)		2206 Plan (2206-2207)		2207 Plan (2207-2208)		2208 Plan (2208-2209)		2209 Plan (2209-2210)		2210 Plan (2210-2211)		2211 Plan (2211-2212)		2212 Plan (2212-2213)		2213 Plan (2213-2214)		2214 Plan (2214-2215)		2215 Plan (2215-2216)		2216 Plan (2216-2217)		2217 Plan (2217-2218)		2218 Plan (2218-2219)		2219 Plan (2219-2220)		2220 Plan (2220-2221)		2221 Plan (2221-2222)		2222 Plan (2222-2223)		2223 Plan (2223-2224)		2224 Plan (2224-2225)		2225 Plan (2225-2226)		2226 Plan (2226-2227)		2227 Plan (2227-2228)		2228 Plan (2228-2229)		2229 Plan (2229-2230)		2230 Plan (2230-2231)		2231 Plan (2231-2232)		2232 Plan (2232-2233)		2233 Plan (2233-2234)		2234 Plan (2234-2235)		2235 Plan (2235-2236)		2236 Plan (2236-2237)		2237 Plan (2237-2238)		2238 Plan (2238-2239)		2239 Plan (2239-2240)		2240 Plan (2240-2241)		2241 Plan (2241-2242)		2242 Plan (2242-2243)		2243 Plan (2243-2244)		2244 Plan (2244-2245)		2245 Plan (2245-2246)		2246 Plan (2246-2247)		2247 Plan (2247-2248)		2248 Plan (2248-2249)		2249 Plan (2249-2250)		2250 Plan (2250-2251)		2251 Plan (2251-2252)		2252 Plan (2252-2253)		2253 Plan (2253-2254)		2254 Plan (2254-2255)		2255 Plan (2255-2256)		2256 Plan (2256-2257)		2257 Plan (2257-2258)		2258 Plan (2258-2259)		2259 Plan (2259-2260)		2260 Plan (2260-2261)		2261 Plan (2261-2262)		2262 Plan (2262-2263)		2263 Plan (2263-2264)		2264 Plan (2264-2265)		2265 Plan (2265-2266)		2266 Plan (2266-2267)		2267 Plan (2267-2268)		2268 Plan (2268-2269)		2269 Plan (2269-2270)		2270 Plan (2270-2271)		2271 Plan (2271-2272)		2272 Plan (2272-2273)		2273 Plan (2273-2274)		2274 Plan (2274-2275)		2275 Plan (2275-2276)		2276 Plan (2276-2277)		2277 Plan (2277-2278)		2278 Plan (2278-2279)		2279 Plan (2279-2280)		2280 Plan (2280-2281)		2281 Plan (2281-2282)		2282 Plan (2282-2283)		2283 Plan (2283-2284)		2284 Plan (2284-2285)		2285 Plan (2285-2286)		2286 Plan (2286-2287)		2287 Plan (2287-2288)		2288 Plan (2288-2289)		2289 Plan (2289-2290)		2290 Plan (2290-2291)		2291 Plan (2291-2292)		2292 Plan (2292-2293)		2293 Plan (2293-2294)		2294 Plan (2294-2295)		2295 Plan (2295-2296)		2296 Plan (2296-2297)		2297 Plan (2297-2298)		2298 Plan (2298-2299)		2299 Plan (2299-2300)		2300 Plan (2300-2301)		2301 Plan (2301-2302)		2302 Plan (2302-2303)		2303 Plan (2303-2304)		2304 Plan (2304-2305)		2305 Plan (2305-2306)		2306 Plan (2306-2307)		2307 Plan (2307-2308)		2308 Plan (2308-2309)		2309 Plan (2309-2310)		2310 Plan (2310-2311)		2311 Plan (2311-2312)		2312 Plan (2312-2313)		2313 Plan (2313-2314)		2314 Plan (2314-2315)		2315 Plan (2315-2316)		2316 Plan (2316-2317)		2317 Plan (2317-2318)		2318 Plan (2318-2319)		2319 Plan (2319-2320)		2320 Plan (2320-2321)		2321 Plan (2321-2322)		2322 Plan (2322-2323)		2323 Plan (2323-2324)		2324 Plan (2324-2325)		2325 Plan (2325-2326)		2326 Plan (2326-2327)		2327 Plan (2327-2328)		2328 Plan (2328-2329)		2329 Plan (2329-2330)		2330 Plan (2330-2331)		2331 Plan (2331-2332)		2332 Plan (2332-2333)		2333 Plan (2333-2334)		2334 Plan (2334-2335)		2335 Plan (2335-2336)		2336 Plan (2336-2337)		2337 Plan (2337-2338)		2338 Plan (2338-2339)		2339 Plan (2339-2340)		2340 Plan (2340-2341)		2341 Plan (2341-2342)		2342 Plan (2342-2343)		2343 Plan (2343-2344)		2344 Plan (2344-2345)		2345 Plan (2345-2346)		2346 Plan (2346-2347)		2347 Plan (2347-2348)		2348 Plan (2348-2349)		2349 Plan (2349-2350)		2350 Plan (2350-2351)		2351 Plan (2351-2352)		2352 Plan (2352-2353)		2353 Plan (2353-2354)		2354 Plan (2354-2355)		2355 Plan (2355-2356)		2356 Plan (2356-2357)		2357 Plan (2357-2358)		2358 Plan (2358-2359)		2359 Plan (2359-2360)		2360 Plan (2360-2361)		2361 Plan (2361-2362)		2362 Plan (2362-2363)		2363 Plan (2363-2364)		2364 Plan (2364-2365)		2365 Plan (2365-2366)		2366 Plan (2366-2367)		2367 Plan (2367-2368)		2368 Plan (2368-2369)		2369 Plan (2369-2370)		2370 Plan (2370-2371)		2371 Plan (2371-2372)		2372 Plan (2372-2373)		2373 Plan (2373-2374)		2374 Plan (2374-2375)		2375 Plan (2375-2376)		2376 Plan (2376-2377)		2377 Plan (2377-2378)		2378 Plan (2378-2379)		2379 Plan (2379-2380)		2380 Plan (2380-2381)		2381 Plan (2381-2382)		2382 Plan (2382-2383)		2383 Plan (2383-2384)		2384 Plan (2384-2385)		2385 Plan (2385-2386)		2386 Plan (2386-2387)		2387 Plan (2387-2388)		2388 Plan (2388-2389)		2389 Plan (2389-2390)		2390 Plan (2390-2391)		2391 Plan (2391-2392)		2392 Plan (2392-2393)		2393 Plan (2393-2394)		2394 Plan (2394-2395)		2395 Plan (2395-2396)		2396 Plan (2396-2397)		2397 Plan (2397-2398)		2398 Plan (2398-2399)		2399 Plan (2399-2400)		2400 Plan (2400-2401)		2401 Plan (2401-2402)		2402 Plan (2402-2403)		2403 Plan (2403-2404)		2404 Plan (2404-2405)		2405 Plan (2405-2406)		2406 Plan (2406-2407)		2407 Plan (2407-2408)		2408 Plan (2408-2409)		2409 Plan (2409-2410)		2410 Plan (2410-2411)		2411 Plan (2411-2412)		2412 Plan (2412-2413)		2413 Plan (2413-2414)		2414 Plan (2414-2415)		2415 Plan (2415-2416)		2416 Plan (2416-2417)		2417 Plan (2417-2418)		2418 Plan (2418-2419)		2419 Plan (2419-2420)		2420 Plan (2420-2421)		2421 Plan (2421-2422)		2422 Plan (2422-2423)		2423 Plan (2423-2424)		2424 Plan (2424-2425)		2425 Plan (2425-2426)		2426 Plan (2426-2427)		2427 Plan (2427-2428)		2428 Plan (2428-2429)		2429 Plan (2429-2430)		2430 Plan (2430-2431)		2431 Plan (2431-2432)		2432 Plan (2432-2433)		2433 Plan (2433-2434)		2434 Plan (2434-2435)		2435 Plan (2435-2436)		2436 Plan (2436-2437)		2437 Plan (2437-2438)		2438 Plan (2438-2439)		2439 Plan (2439-2440)		2440 Plan (2440-2441)		2441 Plan (2441-2442)		2442 Plan (2442-2443)		2443 Plan (2443-2444)		2444 Plan (2444-2445)		2445 Plan (2445-2446)		2446 Plan (2446-2447)		2447 Plan (2447-2448)		2448 Plan (2448-2449)		2449 Plan (2449-2450)		2450 Plan (2450-2451)		2451 Plan (2451-2452)		2452 Plan (2452-2453)		2453 Plan (2453-2454)		2454 Plan (2454-2455)		2455 Plan (2455-2456)		2456 Plan (2456-2457)		2457 Plan (2457-2458)		2458 Plan (2458-2459)		2459 Plan (2459-2460)		2460 Plan (2460-2461)		2461 Plan (2461-2462)		2462 Plan (2462-2463)		2463 Plan (2463-2464)		2464 Plan (2464-2465)		2465 Plan (2465-2466)		2466 Plan (2466-2467)		2467 Plan (2467-2468)		2468 Plan (2468-2469)		2469 Plan (2469-2470)		2470 Plan (2470-2471)		2471 Plan (2471-2472)		2472 Plan (2472-2473)		2473 Plan (2473-2474)		2474 Plan (2474-2475)		2475 Plan (2475-2476)		2476 Plan (2476-2477)		2477 Plan (2477-2478)		2478 Plan (2478-2479)		2479 Plan (2479-2480)		2480 Plan (2480-2481)		2481 Plan (2481-2482)		2482 Plan (2482-2483)		2483 Plan (2483-2484)		2484 Plan (2484-2485)		2485 Plan (2485-2486)		2486 Plan (2486-2487)		2487 Plan (2487-2488)		2488 Plan (2488-2489)		2489 Plan (2489-2490)		2490 Plan (2490-2491)		2491 Plan (2491-2492)		2492 Plan (2492-2493)		2493 Plan (2493-2494)		2494 Plan (2494-2495)		2495 Plan (2495-2496)		2496 Plan (2496-2497)		2497 Plan (2497-2498)		2498 Plan (2498-2499)		2499 Plan (2499-2500)		2500 Plan (2500-2501)		2501 Plan (2501-2502)		2502 Plan (2502-2503)		2503 Plan (2503-2504)		2504 Plan (2504-2505)		2505 Plan (2505-2506)		2506 Plan (2506-2507)		2507 Plan (2507-2508)		2508 Plan (2508-2509)		2509 Plan (2509-2510)		2510 Plan (2510-2511)		2511 Plan (2511-2512)		2512 Plan (2512-2513)		2513 Plan (2513-2514)		2514 Plan (2514-2515)		2515 Plan (2515-2516)		2516 Plan (2516-2517)		2517 Plan (2517-2518)		2518 Plan (2518-2519)		2519 Plan (2519-2520)		2520 Plan (2520-2521)		2521 Plan (2521-2522)		2522 Plan (2522-2523)		2523 Plan (2523-2524)		2524 Plan (2524-2525)		2525 Plan (2525-2526)		2526 Plan (2526-2527)		2527 Plan (2527-2528)		2528 Plan (2528-2529)		2529 Plan (2529-2530)		2530 Plan (2530-2531)		2531 Plan (2531-2532)		2532 Plan (2532-2533)		2533 Plan (2533-2534)		2534 Plan (2534-2535)		2535 Plan (2535-25	
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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]

Company Name: QFC Insurance Company		Market: Small Group	
Product: POS		Effective Date of Rates: January 1, 2021	
Endline date of Rates: March 1, 2021			
HMO Plan ID (On Exchange)	1510000000000	1510000000000	1510000000000
HMO Plan ID (Off Exchange)	1510000000000	1510000000000	1510000000000
Plan Name/Network	1510000000000	1510000000000	1510000000000
Form #	1510000000000	1510000000000	1510000000000
Rating Area	1510000000000	1510000000000	1510000000000
Network	1510000000000	1510000000000	1510000000000
Personal Choice Network	1510000000000	1510000000000	1510000000000
Platform	1510000000000	1510000000000	1510000000000
Default/Rate	1510000000000	1510000000000	1510000000000
Contribution	1510000000000	1510000000000	1510000000000
Capex	1510000000000	1510000000000	1510000000000
OP Maximum	1510000000000	1510000000000	1510000000000
Pediatric Dental (Yes/No)	1510000000000	1510000000000	1510000000000
Age Band	1510000000000	1510000000000	1510000000000
0-14	1510000000000	1510000000000	1510000000000
15	1510000000000	1510000000000	1510000000000
16	1510000000000	1510000000000	1510000000000
17	1510000000000	1510000000000	1510000000000
18	1510000000000	1510000000000	1510000000000
19	1510000000000	1510000000000	1510000000000
20	1510000000000	1510000000000	1510000000000
21	1510000000000	1510000000000	1510000000000
22	1510000000000	1510000000000	1510000000000
23	1510000000000	1510000000000	1510000000000
24	1510000000000	1510000000000	1510000000000
25	1510000000000	1510000000000	1510000000000
26	1510000000000	1510000000000	1510000000000
27	1510000000000	1510000000000	1510000000000
28	1510000000000	1510000000000	1510000000000
29	1510000000000	1510000000000	1510000000000
30	1510000000000	1510000000000	1510000000000
31	1510000000000	1510000000000	1510000000000
32	1510000000000	1510000000000	1510000000000
33	1510000000000	1510000000000	1510000000000
34	1510000000000	1510000000000	1510000000000
35	1510000000000	1510000000000	1510000000000
36	1510000000000	1510000000000	1510000000000
37	1510000000000	1510000000000	1510000000000
38	1510000000000	1510000000000	1510000000000
39	1510000000000	1510000000000	1510000000000
40	1510000000000	1510000000000	1510000000000
41	1510000000000	1510000000000	1510000000000
42	1510000000000	1510000000000	1510000000000
43	1510000000000	1510000000000	1510000000000
44	1510000000000	1510000000000	1510000000000
45	1510000000000	1510000000000	1510000000000
46	1510000000000	1510000000000	1510000000000
47	1510000000000	1510000000000	1510000000000
48	1510000000000	1510000000000	1510000000000
49	1510000000000	1510000000000	1510000000000
50	1510000000000	1510000000000	1510000000000
51	1510000000000	1510000000000	1510000000000
52	1510000000000	1510000000000	1510000000000
53	1510000000000	1510000000000	1510000000000
54	1510000000000	1510000000000	1510000000000
55	1510000000000	1510000000000	1510000000000
56	1510000000000	1510000000000	1510000000000
57	1510000000000	1510000000000	1510000000000
58	1510000000000	1510000000000	1510000000000
59	1510000000000	1510000000000	1510000000000
60	1510000000000	1510000000000	1510000000000
61	1510000000000	1510000000000	1510000000000
62	1510000000000	1510000000000	1510000000000
63	1510000000000	1510000000000	1510000000000
64	1510000000000	1510000000000	1510000000000

**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

**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:

[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

12/24/2014

**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: ABC Corporation
Address: 123 Main Street, Suite 456, New York, NY 10001
Phone: (212) 555-1234

Section A: General Information										Section B: Financial Data										Section C: Operational Metrics										Section D: Compliance & Legal										Section E: Human Resources																																							
Sub-Section A.1: Company Overview										Sub-Section B.1: Income Statement										Sub-Section C.1: Production Volume										Sub-Section D.1: Regulatory Filings										Sub-Section E.1: Employee Data																																							
Item Description										Revenue										Units Produced										Filing Date										Employee Count																																							
Total Revenue										1,234,567										12,345										2023-12-31										150																																							
Cost of Goods Sold										789,012										8,765										2023-12-31										100																																							
Gross Profit										445,555										3,580										2023-12-31										50																																							
Operating Expenses										234,567										2,345										2023-12-31										30																																							
Net Operating Income										210,988										1,235										2023-12-31										20																																							
Interest Expense										12,345										1,234										2023-12-31										10																																							
Income Before Taxes										198,643										1,111										2023-12-31										10																																							
Income Tax Expense										45,678										456										2023-12-31										5																																							
Net Income										152,965										655										2023-12-31										5																																							
Earnings Per Share										1.53										65.5										2023-12-31										0.5																																							
Dividends Per Share										0.50										20.0										2023-12-31										0.5																																							
Total Dividends										7,670										800										2023-12-31										50																																							
Retained Earnings										145,295										575										2023-12-31										45																																							
Total Assets										1,500,000										15,000										2023-12-31										1,500																																							
Total Liabilities										800,000										8,000										2023-12-31										800																																							
Total Equity										700,000										7,000										2023-12-31										700																																							
Current Assets										600,000										6,000										2023-12-31										600																																							
Current Liabilities										300,000										3,000										2023-12-31										300																																							
Long-Term Assets										900,000										9,000										2023-12-31										1,000																																							
Long-Term Liabilities										500,000										5,000										2023-12-31										500																																							
Shareholders' Equity										200,000										2,000										2023-12-31										200																																							
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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									
4	HIOS Issuer ID: 31609																			Market: Small Group									
5	Effective Date of Rate Change(s): 1/1/2021																			To validate, select the Validate button or Ctrl + Shift + I.									
6																				To finalize, select the Finalize button or Ctrl + Shift + F.									
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																													
14	Allowed Claims																			\$483,398,548.96 PMPM \$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									
24																				Year 1 Trend									
25																				Cost									
26																				Utilization									
27																				Year 2 Trend									
28																				Cost									
29																				Utilization									
30																				Trended EHB Allowed Claims PMPM									
31																													
32	Inpatient Hospital																			\$90.71 1.041 1.100 1.041 1.100 \$118.94									
33	Outpatient Hospital																			\$129.47 1.042 1.100 1.042 1.100 \$170.09									
34	Professional																			\$180.20 1.028 1.100 1.028 1.100 \$230.42									
35	Other Medical																			\$0.00 1.028 1.100 1.028 1.100 \$0.00									
36	Capitation																			\$10.31 0.976 1.000 0.976 1.000 \$9.82									
37	Prescription Drug																			\$140.21 0.979 1.100 0.979 1.100 \$162.60									
38	Total																			\$550.90 \$691.89									
39																													
40	Morbidity Adjustment																			1.010									
41	Demographic Shift																			1.007									
42	Plan Design Changes																			1.000									
43	Other																			1.000									
44	Adjusted Trended EHB Allowed Claims PMPM for 1/1/2021																			\$703.70									
45																													
46	Manual EHB Allowed Claims PMPM																			\$0.00									
47	Applied Credibility %																			100.00%									
48																													
49																													
50																													
51																													

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

Product-Plan Data Collection

Company Legal Name: QCC Insurance Company, Inc.
HIO5 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

1.1 Product Name	Personal Choice PPO Small Group																At Choice EPO Small Group
1.2 Product ID	31609PA015																31609PA017
1.3 Plan Name	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice	Personal Choice
1.4 Plan ID (Standard Component ID)	31609PA0150025	31609PA0150026	31609PA0150027	31609PA0150028	31609PA0150029	31609PA0150030	31609PA0150031	31609PA0150032	31609PA0150033	31609PA0150034	31609PA0150035	31609PA0150036	31609PA0150037	31609PA0150038	31609PA0150039	31609PA0150040	31609PA0150041
1.5 Metal	Platinum	Platinum	Gold	Gold	Silver	Platinum	Gold	Gold	Silver	Silver	Bronze	Bronze	Gold	Gold	Silver	Silver	Silver
1.6 AV Metal Value	0.897	0.878	0.812	0.807	0.719	0.908	0.810	0.813	0.785	0.715	0.718	0.650	0.646	0.819	0.804	0.709	0.718
1.7 Plan Category	Renewable	Renewable	Renewable	Renewable	Renewable	Renewable	Renewable	Renewable	Terminated	Renewable	Renewable	Renewable	Renewable	Renewable	Renewable	Renewable	Renewable
1.8 Plan Type	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO	PPO
1.9 Exchange Plan?	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No
1.10 Effective Date of Proposed Rates	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021	1/1/2021
1.11 Cumulative Rate Change % (lower 12 mos prior)	4.10%	4.20%	4.45%	4.43%	4.00%	3.41%	4.08%	4.98%	0.00%	4.76%	5.03%	3.59%	4.40%	3.15%	3.62%	3.69%	3.96%
1.12 Product Rate Increase %																	
1.13 Submission Level Rate Increase %																	4.39%

Worksheet 1 Totals

Section II: Experience Period and Current Plan Level Information

	2.1 Plan ID (Standard Component ID)	Total	31609PA0150025	31609PA0150026	31609PA0150027	31609PA0150028	31609PA0150029	31609PA0150030	31609PA0150031	31609PA0150032	31609PA0150033	31609PA0150034	31609PA0150035	31609PA0150036	31609PA0150037	31609PA0150038	31609PA0150039	31609PA0150040	31609PA0150041	
5483,398,549	2.2 Allowed Claims	\$483,398.549	\$60,654.157	\$97,416.838	\$85,945.116	\$14,108.330	\$13,287.814	\$8,755.594	\$7,818.731	\$16,255.783	\$499,109	\$4,857,962	\$12,929,081	\$40,218,708	\$24,213,985	\$6,773,971	\$24,288,352	\$7,143,069	\$14,744,425	\$40,289,642
	2.3 Reinsurance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
	2.4 Member Cost Sharing	\$89,981,971	\$5,495,190	\$9,831,191	\$13,248,196	\$2,597,567	\$3,671,701	\$1,274,459	\$1,816,944	\$2,871,714	\$181,397	\$1,509,778	\$3,105,231	\$14,169,734	\$8,118,148	\$1,427,600	\$4,143,931	\$1,953,310	\$3,804,654	\$9,698,795
	2.5 Cost Sharing Reduction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
5393,416,578	2.6 Incurred Claims	\$393,416,578	\$55,159,007	\$87,485,448	\$72,086,970	\$11,510,742	\$9,614,113	\$7,481,111	\$6,001,787	\$13,384,069	\$117,211	\$1,348,314	\$9,673,652	\$35,048,974	\$16,095,637	\$5,346,171	\$20,144,420	\$5,189,760	\$10,939,721	\$30,950,448
511,406,409	2.7 Risk Adjustment Transfer Amount	\$11,406,409	\$10,516,609	\$13,389,292	\$15,115,108	\$906,079	\$9,360,364	\$1,203,805	\$993,028	\$1,981,802	\$9,228	\$1,646,313	\$1,256,109	\$1,468,117	\$2,093,122	\$249,961	\$1,953,911	\$1,093,127	\$4,794,346	\$998,321
518,934,029	2.8 Premium	\$518,934,029	\$72,238,861	\$110,948,601	\$102,968,193	\$13,594,664	\$14,788,762	\$8,561,123	\$8,057,964	\$15,867,120	\$200,181	\$6,077,899	\$12,344,161	\$34,574,651	\$20,490,465	\$5,536,982	\$27,698,176	\$8,175,228	\$15,105,066	\$37,893,421
877,471	2.9 Exchange Period Member Months	877,471	90,267	148,825	169,916	22,902	30,710	12,631	14,025	23,176	1,318	12,101	21,147	92,247	49,205	8,944	46,459	19,169	14,893	70,667
	2.10 Current Enrollment	76,484	7,334	12,414	14,708	1,998	2,733	966	961	1,583	146	1,437	6,075	4,288	964	1,442	1,087	3,447	5,882	8,444
	2.11 Current Premium PMPM	\$579.13	\$800.46	\$735.69	\$595.92	\$568.67	\$474.70	\$665.91	\$570.20	\$640.09	\$545.17	\$487.93	\$569.52	\$373.28	\$410.94	\$598.71	\$582.34	\$420.35	\$424.01	\$532.31
	2.12 Loss Ratio	74.18%	66.65%	70.45%	70.51%	79.93%	77.37%	76.63%	66.31%	77.15%	45.98%	75.56%	82.78%	81.49%	87.59%	92.39%	70.06%	106.09%	78.66%	93.27%
	Per Member Per Month																			
	2.13 Allowed Claims	\$550.90	\$671.94	\$654.57	\$505.81	\$616.03	\$432.69	\$693.07	\$557.49	\$695.40	\$378.69	\$398.49	\$611.39	\$435.99	\$492.10	\$757.38	\$522.79	\$372.64	\$422.56	\$570.13
	2.14 Reinsurance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	2.15 Member Cost Sharing	\$102.55	\$60.88	\$66.06	\$77.97	\$113.42	\$119.63	\$100.88	\$129.55	\$122.85	\$137.63	\$123.84	\$146.84	\$153.61	\$164.99	\$159.62	\$89.20	\$101.90	\$109.04	\$137.25
	2.16 Cost Sharing Reduction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	2.17 Incurred Claims	\$446.35	\$611.07	\$588.51	\$427.84	\$500.61	\$313.06	\$593.19	\$457.93	\$571.56	\$241.86	\$274.65	\$464.55	\$282.38	\$327.12	\$597.76	\$433.60	\$270.74	\$313.52	\$432.89
	2.18 Risk Adjustment Transfer Amount	\$13.00	\$116.51	\$89.83	\$0.80	\$35.20	\$76.96	\$95.14	\$79.80	\$84.78	\$7.00	\$135.06	\$81.04	\$28.27	\$42.96	\$27.95	\$22.73	\$161.20	\$137.40	\$14.13
	2.19 Premium	\$591.40	\$800.28	\$745.50	\$605.99	\$591.60	\$481.56	\$677.68	\$574.54	\$657.39	\$531.25	\$498.55	\$583.73	\$374.81	\$416.43	\$619.07	\$596.19	\$426.48	\$432.91	\$536.23

Section III: Plan Adjustment Factors

3.1 Plan ID (Standard Component ID)	31609PA0150025	31609PA0150026	31609PA0150027	31609PA0150028	31609PA0150029	31609PA0150030	31609PA0150031	31609PA0150032	31609PA0150033	31609PA0150034	31609PA0150035	31609PA0150036	31609PA0150037	31609PA0150038	31609PA0150039	31609PA0150040	31609PA0150041
3.2 Market Adjusted Index Rate										\$67.84							
3.3 AV and Cost Sharing Design of Plan	1.0356	0.9858	0.7881	0.7717	0.6332	0.8824	0.7351	0.8559	0.0000	0.6282	0.6907	0.4714	0.5085	0.7653	0.7640	0.5409	0.6308
3.4 Provider Network Adjustment	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	0.0000	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006	1.0006
3.5 Benefits In Addition to EHB	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	0.0000	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096	1.0096
3.6 Administrative Expense	14.61%	14.61%	14.61%	14.61%	14.61%	14.61%	14.61%	14.61%	0.00%	14.61%	14.61%	14.61%	14.61%	14.61%	14.61%	14.61%	14.61%
3.7 Taxes and Fees	2.49%	2.49%	2.49%	2.49%	2.49%	2.49%	2.49%	2.49%	0.00%	2.49%	2.49%	2.49%	2.49%	2.49%	2.49%	2.49%	2.49%
3.8 Profit & Risk Load	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	0.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%
3.9 Catastrophe Adjustment	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	0.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
3.10 Plan Adjusted Index Rate	\$883.02	\$840.56	\$671.99	\$658.00	\$538.20	\$752.39	\$636.80	\$729.80	\$0.00	\$535.65	\$588.94	\$491.95	\$433.58	\$652.53	\$651.44	\$461.21	\$475.36
3.11 Age Calibration Factor	0.9699									0.9699							
3.12 Geographic Calibration Factor	1.0000									1.0000							
3.13 Tobacco Calibration Factor	0.9937									0.9937							
3.14 Calibrated Plan Adjusted Index Rate	\$579.91	\$552.03	\$441.32	\$432.14	\$353.46	\$494.12	\$411.64	\$479.29	\$0.00	\$351.78	\$386.78	\$261.97	\$284.75	\$428.55	\$427.82	\$302.89	\$312.19

Section IV: Projected Plan Level Information

4.1 Plan ID (Standard Component ID)	Total	31609PA0150025	31609PA0150026	31609PA0150027	31609PA0150028	31609PA0150029	31609PA0150030	31609PA0150031	31609PA0150032	31609PA0150033	31609PA0150034	31609PA0150035	31609PA0150036	31609PA0150037	31609PA0150038	31609PA0150039	31609PA0150040	31609PA0150041
4.2 Allowed Claims	\$645,473.535	\$66,972,900	\$111,136,513	\$121,835,198	\$16,449,178	\$21,626,495	\$9,159,036	\$7,807,149	\$16,860,810	\$0	\$7,833,440	\$14,225,548	\$81,741,779	\$37,867,775	\$6,455,725	\$34,064,472	\$15,293,524	\$26,087,609
4.3 Reinsurance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4.4 Member Cost Sharing	\$150,830.923	\$4,101,734	\$9,841,847	\$25,887,981	\$3,686,832	\$7,243,626	\$1,872,589	\$3,959,681	\$2,812,071	\$0	\$2,643,791	\$4,059,936	\$30,234,610	\$14,815,380	\$1,476,777	\$7,808,896	\$6,396,974	\$10,701,846
4.5 Cost Sharing Reduction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4.6 Incurred Claims	\$473,644,612	\$62,872,167	\$101,294,556	\$95,947,717	\$12,762,546	\$14,382,870	\$7,786,447	\$5,847,459	\$14,048,739	\$0	\$5,189,649	\$10,165,612	\$31,507,161	\$18,047,395	\$4,973,499	\$26,195,576	\$8,894,551	\$15,905,663
4.7 Risk Adjustment Transfer Amount	\$14,179,470	\$13,777,673	\$2,331,937	\$2,767,859	\$375,319	\$517,144	\$200,245	\$180,521	\$372,501	\$0	\$197,427	\$333,993	\$1,515,867	\$805,489	\$147,648	\$778,064	\$373,253	\$647,510
4.8 Premium	\$585,463,436	\$77,709,854	\$125,211,350	\$118,598,199	\$15,775,645	\$17,779,369	\$9,624,227	\$7,227,914	\$17,365,564	\$0	\$6,414,630	\$12,565,054	\$38,947,111	\$22,309,451	\$6,154,566	\$32,377,745	\$10,996,589	\$19,662,073
4.9 Projected Member Months	905,808	88,008	148,968	176,496	23,976	30,086	12,792	14,532	23,796	0	11,976	21,336	96,900	51,456	9,432	49,704	23,844	41,364
4.10 Loss Ratio	78.99%	79.50%	79.42%	79.06%	79.02%	78.61%	79.39%	78.93%	79.20%	RDV/01	78.61%	78.93%	77.86%	78.08%	79.00%	79.01%	78.52%	78.80%
4.11 Allowed Claims	\$689.41	\$760.99	\$746.04	\$690.30	\$686.08	\$654.63	\$716.00	\$677.00	\$709.56	RDV/01	\$604.09	\$666.74	\$637.17	\$638.66	\$684.45	\$684.14	\$641.40	\$643.26
4.12 Reinsurance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	RDV/01	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
4.13 Member Cost Sharing	\$166.52	\$46.61	\$66.07	\$146.68	\$153.77	\$219.26	\$107.30	\$190.93	\$130.17	RDV/01	\$320.76	\$320.22	\$287.92	\$156.57	\$157.11	\$268.28	\$139.73	\$190.86
4.14 Cost Sharing Reduction	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	RDV/01	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
4.15 Incurred Claims	\$522.80	\$714.38	\$679.98	\$544.62	\$532.31	\$435.37	\$608.70	\$510.65	\$590.38	RDV/01	\$411.34	\$476.45	\$325.15	\$336.73	\$527.88	\$527.03	\$373.15	\$475.61
4.16 Risk Adjustment Transfer Amount	\$15.65	\$15.65	\$15.65	\$15.65	\$15.65	\$15.65	\$15.65	\$15.65	\$15.65	RDV/01	\$15.65	\$15.65	\$15.65	\$15.65	\$15.65	\$15.65	\$15.65	\$15.65
4.17 Premium	\$892.99	\$671.98	\$671.98	\$671.98	\$671.98	\$671.98	\$671.98	\$671.98	\$671.98	RDV/01	\$671.98	\$671.98	\$671.98	\$671.98	\$671.98	\$671.98	\$671.98	\$671.98

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

Project Information		Financial Summary		Operational Data	
Project Name	Project ID	Budget	Actual	Units Produced	Quality Score
Project Alpha	Alpha-001	1000000	980000	10000	95
	Alpha-002	1200000	1150000	12000	92
	Alpha-003	800000	780000	8000	98
	Alpha-004	1500000	1450000	15000	90
	Alpha-005	900000	880000	9000	96
	Alpha-006	1100000	1080000	11000	93
	Alpha-007	1300000	1250000	13000	91
	Alpha-008	700000	680000	7000	97
	Alpha-009	1400000	1350000	14000	89
	Alpha-010	1600000	1550000	16000	88
Project Beta	Beta-001	1100000	1050000	11000	94
	Beta-002	1300000	1250000	13000	91
	Beta-003	900000	880000	9000	96
	Beta-004	1500000	1450000	15000	90
	Beta-005	800000	780000	8000	98
	Beta-006	1200000	1150000	12000	92
	Beta-007	1400000	1350000	14000	89
	Beta-008	700000	680000	7000	97
	Beta-009	1600000	1550000	16000	88
	Beta-010	1800000	1750000	18000	85
Project Gamma	Gamma-001	1200000	1150000	12000	92
	Gamma-002	1400000	1350000	14000	89
	Gamma-003	1000000	980000	10000	95
	Gamma-004	1600000	1550000	16000	88
	Gamma-005	900000	880000	9000	96
	Gamma-006	1300000	1250000	13000	91
	Gamma-007	1500000	1450000	15000	90
	Gamma-008	800000	780000	8000	98
	Gamma-009	1700000	1650000	17000	87
	Gamma-010	1900000	1850000	19000	84
Project Delta	Delta-001	1300000	1250000	13000	91
	Delta-002	1500000	1450000	15000	90
	Delta-003	1100000	1080000	11000	93
	Delta-004	1700000	1650000	17000	87
	Delta-005	900000	880000	9000	96
	Delta-006	1400000	1350000	14000	89
	Delta-007	1600000	1550000	16000	88
	Delta-008	800000	780000	8000	98
	Delta-009	1800000	1750000	18000	85
	Delta-010	2000000	1950000	20000	83
Project Epsilon	Epsilon-001	1400000	1350000	14000	89
	Epsilon-002	1600000	1550000	16000	88
	Epsilon-003	1200000	1150000	12000	92
	Epsilon-004	1800000	1750000	18000	85
	Epsilon-005	1000000	980000	10000	95
	Epsilon-006	1500000	1450000	15000	90
	Epsilon-007	1700000	1650000	17000	87
	Epsilon-008	900000	880000	9000	96
	Epsilon-009	1900000	1850000	19000	84
	Epsilon-010	2100000	2050000	21000	82
Project Zeta	Zeta-001	1500000	1450000	15000	90
	Zeta-002	1700000	1650000	17000	87
	Zeta-003	1300000	1250000	13000	91
	Zeta-004	1900000	1850000	19000	84
	Zeta-005	1100000	1080000	11000	93
	Zeta-006	1600000	1550000	16000	88
	Zeta-007	1800000	1750000	18000	85
	Zeta-008	1000000	980000	10000	95
	Zeta-009	2000000	1950000	20000	83
	Zeta-010	2200000	2150000	22000	81
Project Eta	Eta-001	1600000	1550000	16000	88
	Eta-002	1800000	1750000	18000	85
	Eta-003	1400000	1350000	14000	89
	Eta-004	2000000	1950000	20000	83
	Eta-005	1200000	1150000	12000	92
	Eta-006	1700000	1650000	17000	87
	Eta-007	1900000	1850000	19000	84
	Eta-008	1100000	1080000	11000	93
	Eta-009	2100000	2050000	21000	82
	Eta-010	2300000	2250000	23000	80
Project Theta	Theta-001	1700000	1650000	17000	87
	Theta-002	1900000	1850000	19000	84
	Theta-003	1500000	1450000	15000	90
	Theta-004	2100000	2050000	21000	82
	Theta-005	1300000	1250000	13000	91
	Theta-006	1800000	1750000	18000	85
	Theta-007	2000000	1950000	20000	83
	Theta-008	1100000	1080000	11000	93
	Theta-009	2200000	2150000	22000	81
	Theta-010	2400000	2350000	24000	79
Project Iota	Iota-001	1800000	1750000	18000	85
	Iota-002	2000000	1950000	20000	83
	Iota-003	1600000	1550000	16000	88
	Iota-004	2200000	2150000	22000	81
	Iota-005	1400000	1350000	14000	89
	Iota-006	1900000	1850000	19000	84
	Iota-007	2100000	2050000	21000	82
	Iota-008	1200000	1150000	12000	92
	Iota-009	2300000	2250000	23000	80
	Iota-010	2500000	2450000	25000	78
Project Kappa	Kappa-001	1900000	1850000	19000	84
	Kappa-002	2100000	2050000	21000	82
	Kappa-003	1700000	1650000	17000	87
	Kappa-004	2300000	2250000	23000	80
	Kappa-005	1500000	1450000	15000	90
	Kappa-006	2000000	1950000	20000	83
	Kappa-007	2200000	2150000	22000	81
	Kappa-008	1300000	1250000	13000	91
	Kappa-009	2400000	2350000	24000	79
	Kappa-010	2600000	2550000	26000	77
Project Lambda	Lambda-001	2000000	1950000	20000	83
	Lambda-002	2200000	2150000	22000	81
	Lambda-003	1800000	1750000	18000	85
	Lambda-004	2400000	2350000	24000	79
	Lambda-005	1600000	1550000	16000	88
	Lambda-006	2100000	2050000	21000	82
	Lambda-007	2300000	2250000	23000	80
	Lambda-008	1400000	1350000	14000	89
	Lambda-009	2500000	2450000	25000	78
	Lambda-010	2700000	2650000	27000	76
Project Mu	Mu-001	2100000	2050000	21000	82
	Mu-002	2300000	2250000	23000	80
	Mu-003	1900000	1850000	19000	84
	Mu-004	2500000	2450000	25000	78
	Mu-005	1700000	1650000	17000	87
	Mu-006	2200000	2150000	22000	81
	Mu-007	2400000	2350000	24000	79
	Mu-008	1500000	1450000	15000	90
	Mu-009	2600000	2550000	26000	77
	Mu-010	2800000	2750000	28000	75
Project Nu	Nu-001	2200000	2150000	22000	81
	Nu-002	2400000	2350000	24000	79
	Nu-003	2000000	1950000	20000	83
	Nu-004	2600000	2550000	26000	77
	Nu-005	1800000	1750000	18000	85
	Nu-006	2300000	2250000	23000	80
	Nu-007	2500000	2450000	25000	78
	Nu-008	1600000	1550000	16000	88
	Nu-009	2700000	2650000	27000	76
	Nu-010	2900000	2850000	29000	74
Project Xi	Xi-001	2300000	2250000	23000	80
	Xi-002	2500000	2450000	25000	78
	Xi-003	2100000	2050000	21000	82
	Xi-004	2700000	2650000	27000	76
	Xi-005	1900000	1850000	19000	84
	Xi-006	2400000	2350000	24000	79
	Xi-007	2600000	2550000	26000	77
	Xi-008	1700000	1650000	17000	87
	Xi-009	2800000	2750000	28000	75
	Xi-010	3000000	2950000	30000	73
Project Omicron	Omicron-001	2400000	2350000	24000	79
	Omicron-002	2600000	2550000	26000	77
	Omicron-003	2200000	2150000	22000	81
	Omicron-004	2800000	2750000	28000	75
	Omicron-005	2000000	1950000	20000	83
	Omicron-006	2500000	2450000	25000	78
	Omicron-007	2700000	2650000	27000	76
	Omicron-008	1800000	1750000	18000	85
	Omicron-009	2900000	2850000	29000	74
	Omicron-010	3100000	3050000	31000	72
Project Pi	Pi-001	2500000	2450000	25000	78
	Pi-002	2700000	2650000	27000	76
	Pi-003	2300000	2250000	23000	80
	Pi-004	2900000	2850000	29000	74
	Pi-005	2100000	2050000	21000	82
	Pi-006	2600000	2550000	26000	77
	Pi-007	2800000	2750000	28000	75
	Pi-008	1900000	1850000	19000	84
	Pi-009	3000000	2950000	30000	73
	Pi-010	3200000	3150000	32000	71
Project Rho	Rho-001	2600000	2550000	26000	77
	Rho-002	2800000	2750000	28000	75
	Rho-003	2400000	2350000	24000	79
	Rho-004	3000000	2950000	30000	73
	Rho-005	2200000	2150000	22000	81
	Rho-006	2700000	2650000	27000	76
	Rho-007	2900000	2850000	29000	74
	Rho-008	2000000	1950000	20000	83
	Rho-009	3100000	3050000	31000	72
	Rho-010	3300000	3250000	33000	70
Project Sigma	Sigma-001	2700000	2650000	27000	76
	Sigma-002	2900000	2850000	29000	74
	Sigma-003	2500000	2450000	25000	78
	Sigma-004	3100000	3050000	31000	72
	Sigma-005	2300000	2250000	23000	80
	Sigma-006	2800000	2750000	28000	75
	Sigma-007	3000000	2950000	30000	73
	Sigma-008	2100000	2050000	21000	82
	Sigma-009	3200000	3150000	32000	71
	Sigma-010	3400000	3350000	34000	69
Project Tau	Tau-001	2800000	2750000	28000	75
	Tau-002	3000000	2950000	30000	73
	Tau-003	2600000	2550000	26000	77
	Tau-004	3200000	3150000	32000	71
	Tau-005	2400000	2350000	24000	79
	Tau-006	2900000	2850000	29000	74
	Tau-007	3100000	3050000	31000	72
	Tau-008	2200000	2150000	22000	81
	Tau-009	3300000	3250000	33000	70
	Tau-010	3500000	3450000	35000	68
Project Upsilon	Upsilon-001	2900000	2850000	29000	74
	Upsilon-002	3100000	3050000	31000	72

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
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1994	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				
1995	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					
1996	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						
1997	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							
1998	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								
1999	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									
2000	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										
2001	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	209																	

Project Information		Financial Summary		Operational Data	
Project ID	Project Name	Budget (USD)	Actual (USD)	Progress (%)	Status
001	Project A	1000000	950000	95%	Completed
002	Project B	2000000	1800000	90%	In Progress
003	Project C	1500000	1200000	80%	In Progress
004	Project D	800000	750000	93%	In Progress
005	Project E	1200000	1100000	92%	In Progress
006	Project F	900000	850000	94%	In Progress
007	Project G	1100000	1050000	95%	In Progress
008	Project H	1300000	1250000	96%	In Progress
009	Project I	1400000	1350000	97%	In Progress
010	Project J	1600000	1550000	97%	In Progress
011	Project K	1700000	1650000	97%	In Progress
012	Project L	1800000	1750000	97%	In Progress
013	Project M	1900000	1850000	97%	In Progress
014	Project N	2000000	1950000	97%	In Progress
015	Project O	2100000	2050000	97%	In Progress
016	Project P	2200000	2150000	97%	In Progress
017	Project Q	2300000	2250000	97%	In Progress
018	Project R	2400000	2350000	97%	In Progress
019	Project S	2500000	2450000	97%	In Progress
020	Project T	2600000	2550000	97%	In Progress
021	Project U	2700000	2650000	97%	In Progress
022	Project V	2800000	2750000	97%	In Progress
023	Project W	2900000	2850000	97%	In Progress
024	Project X	3000000	2950000	97%	In Progress
025	Project Y	3100000	3050000	97%	In Progress
026	Project Z	3200000	3150000	97%	In Progress
027	Project AA	3300000	3250000	97%	In Progress
028	Project AB	3400000	3350000	97%	In Progress
029	Project AC	3500000	3450000	97%	In Progress
030	Project AD	3600000	3550000	97%	In Progress
031	Project AE	3700000	3650000	97%	In Progress
032	Project AF	3800000	3750000	97%	In Progress
033	Project AG	3900000	3850000	97%	In Progress
034	Project AH	4000000	3950000	97%	In Progress
035	Project AI	4100000	4050000	97%	In Progress
036	Project AJ	4200000	4150000	97%	In Progress
037	Project AK	4300000	4250000	97%	In Progress
038	Project AL	4400000	4350000	97%	In Progress
039	Project AM	4500000	4450000	97%	In Progress
040	Project AN	4600000	4550000	97%	In Progress
041	Project AO	4700000	4650000	97%	In Progress
042	Project AP	4800000	4750000	97%	In Progress
043	Project AQ	4900000	4850000	97%	In Progress
044	Project AR	5000000	4950000	97%	In Progress
045	Project AS	5100000	5050000	97%	In Progress
046	Project AT	5200000	5150000	97%	In Progress
047	Project AU	5300000	5250000	97%	In Progress
048	Project AV	5400000	5350000	97%	In Progress
049	Project AW	5500000	5450000	97%	In Progress
050	Project AX	5600000	5550000	97%	In Progress
051	Project AY	5700000	5650000	97%	In Progress
052	Project AZ	5800000	5750000	97%	In Progress
053	Project BA	5900000	5850000	97%	In Progress
054	Project BB	6000000	5950000	97%	In Progress
055	Project BC	6100000	6050000	97%	In Progress
056	Project BD	6200000	6150000	97%	In Progress
057	Project BE	6300000	6250000	97%	In Progress
058	Project BF	6400000	6350000	97%	In Progress
059	Project BG	6500000	6450000	97%	In Progress
060	Project BH	6600000	6550000	97%	In Progress
061	Project BI	6700000	6650000	97%	In Progress
062	Project BJ	6800000	6750000	97%	In Progress
063	Project BK	6900000	6850000	97%	In Progress
064	Project BL	7000000	6950000	97%	In Progress
065	Project BM	7100000	7050000	97%	In Progress
066	Project BN	7200000	7150000	97%	In Progress
067	Project BO	7300000	7250000	97%	In Progress
068	Project BP	7400000	7350000	97%	In Progress
069	Project BQ	7500000	7450000	97%	In Progress
070	Project BR	7600000	7550000	97%	In Progress
071	Project BS	7700000	7650000	97%	In Progress
072	Project BT	7800000	7750000	97%	In Progress
073	Project BU	7900000	7850000	97%	In Progress
074	Project BV	8000000	7950000	97%	In Progress
075	Project BW	8100000	8050000	97%	In Progress
076	Project BX	8200000	8150000	97%	In Progress
077	Project BY	8300000	8250000	97%	In Progress
078	Project BZ	8400000	8350000	97%	In Progress
079	Project CA	8500000	8450000	97%	In Progress
080	Project CB	8600000	8550000	97%	In Progress
081	Project CC	8700000	8650000	97%	In Progress
082	Project CD	8800000	8750000	97%	In Progress
083	Project CE	8900000	8850000	97%	In Progress
084	Project CF	9000000	8950000	97%	In Progress
085	Project CG	9100000	9050000	97%	In Progress
086	Project CH	9200000	9150000	97%	In Progress
087	Project CI	9300000	9250000	97%	In Progress
088	Project CJ	9400000	9350000	97%	In Progress
089	Project CK	9500000	9450000	97%	In Progress
090	Project CL	9600000	9550000	97%	In Progress
091	Project CM	9700000	9650000	97%	In Progress
092	Project CN	9800000	9750000	97%	In Progress
093	Project CO	9900000	9850000	97%	In Progress
094	Project CP	10000000	9950000	97%	In Progress
095	Project CQ	10100000	10050000	97%	In Progress
096	Project CR	10200000	10150000	97%	In Progress
097	Project CS	10300000	10250000	97%	In Progress
098	Project CT	10400000	10350000	97%	In Progress
099	Project CU	10500000	10450000	97%	In Progress
100	Project CV	10600000	10550000	97%	In Progress
101	Project CW	10700000	10650000	97%	In Progress
102	Project CX	10800000	10750000	97%	In Progress
103	Project CY	10900000	10850000	97%	In Progress
104	Project CZ	11000000	10950000	97%	In Progress
105	Project DA	11100000	11050000	97%	In Progress
106	Project DB	11200000	11150000	97%	In Progress
107	Project DC	11300000	11250000	97%	In Progress
108	Project DD	11400000	11350000	97%	In Progress
109	Project DE	11500000	11450000	97%	In Progress
110	Project DF	11600000	11550000	97%	In Progress
111	Project DG	11700000	11650000	97%	In Progress
112	Project DH	11800000	11750000	97%	In Progress
113	Project DI	11900000	11850000	97%	In Progress
114	Project DJ	12000000	11950000	97%	In Progress
115	Project DK	12100000	12050000	97%	In Progress
116	Project DL	12200000	12150000	97%	In Progress
117	Project DM	12300000	12250000	97%	In Progress
118	Project DN	12400000	12350000	97%	In Progress
119	Project DO	12500000	12450000	97%	In Progress
120	Project DP	12600000	12550000	97%	In Progress
121	Project DQ	12700000	12650000	97%	In Progress
122	Project DR	12800000	12750000	97%	In Progress
123	Project DS	12900000	12850000	97%	In Progress
124	Project DT	13000000	12950000	97%	In Progress
125	Project DU	13100000	13050000	97%	In Progress
126	Project DV	13200000	13150000	97%	In Progress
127	Project DW	13300000	13250000	97%	In Progress
128	Project DX	13400000	13350000	97%	In Progress
129	Project DY	13500000	13450000	97%	In Progress
130	Project DZ	13600000	13550000	97%	In Progress
131	Project EA	13700000	13650000	97%	In Progress
132	Project EB	13800000	13750000	97%	In Progress
133	Project EC	13900000	13850000	97%	In Progress
134	Project ED	14000000	13950000	97%	In Progress
135	Project EE	14100000	14050000	97%	In Progress
136	Project EF	14200000	14150000	97%	In Progress
137	Project EG	14300000	14250000	97%	In Progress
138	Project EH	14400000	14350000	97%	In Progress
139	Project EI	14500000	14450000	97%	In Progress
140	Project EJ	14600000	14550000	97%	In Progress
141	Project EK	14700000	14650000	97%	In Progress
142	Project EL	14800000	14750000	97%	In Progress
143	Project EM	14900000	14850000	97%	In Progress
144	Project EN	15000000	14950000	97%	In Progress
145	Project EO	15100000	15050000	97%	In Progress
146	Project EP	15200000	15150000	97%	In Progress
147	Project EQ	15300000	15250000	97%	In Progress
148	Project ER	15400000	15350000	97%	In Progress
149	Project ES	15500000	15450000	97%	In Progress
150	Project ET	15600000	15550000	97%	In Progress
151	Project EU	15700000	15650000	97%	In Progress
152	Project EV	15800000	15750000	97%	In Progress
153	Project EW	15900000	15850000	97%	In Progress
154	Project EX	16000000	15950000	97%	In Progress
155	Project EY	16100000	16050000	97%	In Progress
156	Project EZ	16200000	16150000	97%	In Progress
157	Project FA	16300000	16250000	97%	In Progress
158	Project FB	16400000	16350000	97%	In Progress
159	Project FC	16500000	16450000	97%	In Progress
160	Project FD	16600000	16550000	97%	In Progress
161	Project FE	16700000	16650000	97%	In Progress
162	Project FF	16800000	16750000	97%	In Progress
163	Project FG	16900000	16850000	97%	In Progress
164	Project FH	17000000	16950000	97%	In Progress
165	Project FI	17100000	17050000	97%	In Progress
166	Project FJ	17200000	17150000	97%	In Progress
167	Project FK	17300000	17250000	97%	In Progress
168	Project FL	17400000	17350000	97%	In Progress
169	Project FM	17500000	17450000	97%	In Progress
170	Project FN	17600000	17550000	97%	In Progress
171	Project FO	17700000	17650000	97%	In Progress
172	Project FP	17800000	17750000	97%	In Progress
173	Project FQ	17900000	17850000	97%	In Progress
174	Project FR	18000000	17950000	97%	In Progress
175	Project FS	18100000	18050000	97%	In Progress
176	Project FT	18200000	18150000	97%	In Progress
177	Project FU	18300000	18250000	97%	In Progress
178	Project FV	18400000	18350000	97%	In Progress
179	Project FW	18500000	18450000	97%	In Progress
180	Project FX	18600000	18550000	97%	In Progress
181	Project FY	18700000	18650000	97%	In Progress
182	Project FZ	18800000	18750000	97%	In Progress
183	Project GA	18900000	18850000	97%	In Progress
184	Project GB	19000000	18950000	97%	In Progress
185	Project GC	19100000	19050000	97%	In Progress
186	Project GD	19200000	19150000	97%	In Progress
187	Project GE	19300000	19250000	97%	In Progress
188	Project GF	19400000	19350000	97%	In Progress
189	Project GG	19500000	19450000	97%	In Progress
190	Project GH	19600000	19550000	97%	In Progress
191	Project GI	19700000	19650000	97%	In Progress
192	Project GJ	19800000	19750000	97%	In Progress
193	Project GK	19900000	19850000	97%	In Progress
194	Project GL	20000000	19950000	97%	In Progress
195	Project GM	20100000	20050000	97%	In Progress
196	Project GN	20200000	20150000	97%	In Progress
197	Project GO	20300000	20250000	97%	In Progress
198	Project GP	20400000	20350000	97%	In Progress
199	Project GQ	20500000	20450000	97%	In Progress
200	Project GR	20600000	20550000	97%	In Progress
201	Project GS	20700000	20650000	97%	In Progress
202	Project GT	20800000	20750000	97%	In Progress
203	Project GU	20900000	20850000	97%	In Progress
204	Project GV	21000000	20950000	97%	In Progress
205	Project GW	21100000	21050000	97%	In Progress
206	Project GX	21200000	21150000	97%	In Progress
207	Project GY	21300000	21250000	97%	In Progress
208	Project GZ	21400000	21350000	97%	In Progress
209	Project HA	21500000	21450000	97%	In Progress
210	Project HB	21600000	21550000	97%	In Progress
211	Project HC	21700000	21650000	97%	In Progress
212	Project HD	21800000	21750000	97%	In Progress
213	Project HE	21900000	21850000	97%	In Progress
214	Project HF	22000000	21950000	97%	In Progress

[illegible]

Project Information		Financial Summary		Operational Data	
Project ID	Project Name	Budget (USD)	Actual (USD)	Progress (%)	Status
001	Project A	1000000	950000	95%	Completed
002	Project B	2000000	1800000	90%	In Progress
003	Project C	1500000	1200000	80%	In Progress
004	Project D	800000	750000	93%	In Progress
005	Project E	1200000	1100000	91%	In Progress
006	Project F	900000	850000	94%	In Progress
007	Project G	1100000	1050000	95%	In Progress
008	Project H	1300000	1250000	96%	In Progress
009	Project I	1400000	1350000	96%	In Progress
010	Project J	1600000	1550000	96%	In Progress
011	Project K	1700000	1650000	97%	In Progress
012	Project L	1800000	1750000	97%	In Progress
013	Project M	1900000	1850000	97%	In Progress
014	Project N	2100000	2050000	97%	In Progress
015	Project O	2200000	2150000	97%	In Progress
016	Project P	2300000	2250000	97%	In Progress
017	Project Q	2400000	2350000	97%	In Progress
018	Project R	2500000	2450000	97%	In Progress
019	Project S	2600000	2550000	97%	In Progress
020	Project T	2700000	2650000	97%	In Progress
021	Project U	2800000	2750000	97%	In Progress
022	Project V	2900000	2850000	97%	In Progress
023	Project W	3000000	2950000	97%	In Progress
024	Project X	3100000	3050000	97%	In Progress
025	Project Y	3200000	3150000	97%	In Progress
026	Project Z	3300000	3250000	97%	In Progress
027	Project AA	3400000	3350000	97%	In Progress
028	Project AB	3500000	3450000	97%	In Progress
029	Project AC	3600000	3550000	97%	In Progress
030	Project AD	3700000	3650000	97%	In Progress
031	Project AE	3800000	3750000	97%	In Progress
032	Project AF	3900000	3850000	97%	In Progress
033	Project AG	4000000	3950000	97%	In Progress
034	Project AH	4100000	4050000	97%	In Progress
035	Project AI	4200000	4150000	97%	In Progress
036	Project AJ	4300000	4250000	97%	In Progress
037	Project AK	4400000	4350000	97%	In Progress
038	Project AL	4500000	4450000	97%	In Progress
039	Project AM	4600000	4550000	97%	In Progress
040	Project AN	4700000	4650000	97%	In Progress
041	Project AO	4800000	4750000	97%	In Progress
042	Project AP	4900000	4850000	97%	In Progress
043	Project AQ	5000000	4950000	97%	In Progress
044	Project AR	5100000	5050000	97%	In Progress
045	Project AS	5200000	5150000	97%	In Progress
046	Project AT	5300000	5250000	97%	In Progress
047	Project AU	5400000	5350000	97%	In Progress
048	Project AV	5500000	5450000	97%	In Progress
049	Project AW	5600000	5550000	97%	In Progress
050	Project AX	5700000	5650000	97%	In Progress
051	Project AY	5800000	5750000	97%	In Progress
052	Project AZ	5900000	5850000	97%	In Progress
053	Project BA	6000000	5950000	97%	In Progress
054	Project BB	6100000	6050000	97%	In Progress
055	Project BC	6200000	6150000	97%	In Progress
056	Project BD	6300000	6250000	97%	In Progress
057	Project BE	6400000	6350000	97%	In Progress
058	Project BF	6500000	6450000	97%	In Progress
059	Project BG	6600000	6550000	97%	In Progress
060	Project BH	6700000	6650000	97%	In Progress
061	Project BI	6800000	6750000	97%	In Progress
062	Project BJ	6900000	6850000	97%	In Progress
063	Project BK	7000000	6950000	97%	In Progress
064	Project BL	7100000	7050000	97%	In Progress
065	Project BM	7200000	7150000	97%	In Progress
066	Project BN	7300000	7250000	97%	In Progress
067	Project BO	7400000	7350000	97%	In Progress
068	Project BP	7500000	7450000	97%	In Progress
069	Project BQ	7600000	7550000	97%	In Progress
070	Project BR	7700000	7650000	97%	In Progress
071	Project BS	7800000	7750000	97%	In Progress
072	Project BT	7900000	7850000	97%	In Progress
073	Project BU	8000000	7950000	97%	In Progress
074	Project BV	8100000	8050000	97%	In Progress
075	Project BW	8200000	8150000	97%	In Progress
076	Project BX	8300000	8250000	97%	In Progress
077	Project BY	8400000	8350000	97%	In Progress
078	Project BZ	8500000	8450000	97%	In Progress
079	Project CA	8600000	8550000	97%	In Progress
080	Project CB	8700000	8650000	97%	In Progress
081	Project CC	8800000	8750000	97%	In Progress
082	Project CD	8900000	8850000	97%	In Progress
083	Project CE	9000000	8950000	97%	In Progress
084	Project CF	9100000	9050000	97%	In Progress
085	Project CG	9200000	9150000	97%	In Progress
086	Project CH	9300000	9250000	97%	In Progress
087	Project CI	9400000	9350000	97%	In Progress
088	Project CJ	9500000	9450000	97%	In Progress
089	Project CK	9600000	9550000	97%	In Progress
090	Project CL	9700000	9650000	97%	In Progress
091	Project CM	9800000	9750000	97%	In Progress
092	Project CN	9900000	9850000	97%	In Progress
093	Project CO	10000000	9950000	97%	In Progress
094	Project CP	10100000	10050000	97%	In Progress
095	Project CQ	10200000	10150000	97%	In Progress
096	Project CR	10300000	10250000	97%	In Progress
097	Project CS	10400000	10350000	97%	In Progress
098	Project CT	10500000	10450000	97%	In Progress
099	Project CU	10600000	10550000	97%	In Progress
100	Project CV	10700000	10650000	97%	In Progress
101	Project CW	10800000	10750000	97%	In Progress
102	Project CX	10900000	10850000	97%	In Progress
103	Project CY	11000000	10950000	97%	In Progress
104	Project CZ	11100000	11050000	97%	In Progress
105	Project DA	11200000	11150000	97%	In Progress
106	Project DB	11300000	11250000	97%	In Progress
107	Project DC	11400000	11350000	97%	In Progress
108	Project DD	11500000	11450000	97%	In Progress
109	Project DE	11600000	11550000	97%	In Progress
110	Project DF	11700000	11650000	97%	In Progress
111	Project DG	11800000	11750000	97%	In Progress
112	Project DH	11900000	11850000	97%	In Progress
113	Project DI	12000000	11950000	97%	In Progress
114	Project DJ	12100000	12050000	97%	In Progress
115	Project DK	12200000	12150000	97%	In Progress
116	Project DL	12300000	12250000	97%	In Progress
117	Project DM	12400000	12350000	97%	In Progress
118	Project DN	12500000	12450000	97%	In Progress
119	Project DO	12600000	12550000	97%	In Progress
120	Project DP	12700000	12650000	97%	In Progress
121	Project DQ	12800000	12750000	97%	In Progress
122	Project DR	12900000	12850000	97%	In Progress
123	Project DS	13000000	12950000	97%	In Progress
124	Project DT	13100000	13050000	97%	In Progress
125	Project DU	13200000	13150000	97%	In Progress
126	Project DV	13300000	13250000	97%	In Progress
127	Project DW	13400000	13350000	97%	In Progress
128	Project DX	13500000	13450000	97%	In Progress
129	Project DY	13600000	13550000	97%	In Progress
130	Project DZ	13700000	13650000	97%	In Progress
131	Project EA	13800000	13750000	97%	In Progress
132	Project EB	13900000	13850000	97%	In Progress
133	Project EC	14000000	13950000	97%	In Progress
134	Project ED	14100000	14050000	97%	In Progress
135	Project EE	14200000	14150000	97%	In Progress
136	Project EF	14300000	14250000	97%	In Progress
137	Project EG	14400000	14350000	97%	In Progress
138	Project EH	14500000	14450000	97%	In Progress
139	Project EI	14600000	14550000	97%	In Progress
140	Project EJ	14700000	14650000	97%	In Progress
141	Project EK	14800000	14750000	97%	In Progress
142	Project EL	14900000	14850000	97%	In Progress
143	Project EM	15000000	14950000	97%	In Progress
144	Project EN	15100000	15050000	97%	In Progress
145	Project EO	15200000	15150000	97%	In Progress
146	Project EP	15300000	15250000	97%	In Progress
147	Project EQ	15400000	15350000	97%	In Progress
148	Project ER	15500000	15450000	97%	In Progress
149	Project ES	15600000	15550000	97%	In Progress
150	Project ET	15700000	15650000	97%	In Progress
151	Project EU	15800000	15750000	97%	In Progress
152	Project EV	15900000	15850000	97%	In Progress
153	Project EW	16000000	15950000	97%	In Progress
154	Project EX	16100000	16050000	97%	In Progress
155	Project EY	16200000	16150000	97%	In Progress
156	Project EZ	16300000	16250000	97%	In Progress
157	Project FA	16400000	16350000	97%	In Progress
158	Project FB	16500000	16450000	97%	In Progress
159	Project FC	16600000	16550000	97%	In Progress
160	Project FD	16700000	16650000	97%	In Progress
161	Project FE	16800000	16750000	97%	In Progress
162	Project FF	16900000	16850000	97%	In Progress
163	Project FG	17000000	16950000	97%	In Progress
164	Project FH	17100000	17050000	97%	In Progress
165	Project FI	17200000	17150000	97%	In Progress
166	Project FJ	17300000	17250000	97%	In Progress
167	Project FK	17400000	17350000	97%	In Progress
168	Project FL	17500000	17450000	97%	In Progress
169	Project FM	17600000	17550000	97%	In Progress
170	Project FN	17700000	17650000	97%	In Progress
171	Project FO	17800000	17750000	97%	In Progress
172	Project FP	17900000	17850000	97%	In Progress
173	Project FQ	18000000	17950000	97%	In Progress
174	Project FR	18100000	18050000	97%	In Progress
175	Project FS	18200000	18150000	97%	In Progress
176	Project FT	18300000	18250000	97%	In Progress
177	Project FU	18400000	18350000	97%	In Progress
178	Project FV	18500000	18450000	97%	In Progress
179	Project FW	18600000	18550000	97%	In Progress
180	Project FX	18700000	18650000	97%	In Progress
181	Project FY	18800000	18750000	97%	In Progress
182	Project FZ	18900000	18850000	97%	In Progress
183	Project GA	19000000	18950000	97%	In Progress
184	Project GB	19100000	19050000	97%	In Progress
185	Project GC	19200000	19150000	97%	In Progress
186	Project GD	19300000	19250000	97%	In Progress
187	Project GE	19400000	19350000	97%	In Progress
188	Project GF	19500000	19450000	97%	In Progress
189	Project GG	19600000	19550000	97%	In Progress
190	Project GH	19700000	19650000	97%	In Progress
191	Project GI	19800000	19750000	97%	In Progress
192	Project GJ	19900000	19850000	97%	In Progress
193	Project GK	20000000	19950000	97%	In Progress
194	Project GL	20100000	20050000	97%	In Progress
195	Project GM	20200000	20150000	97%	In Progress
196	Project GN	20300000	20250000	97%	In Progress
197	Project GO	20400000	20350000	97%	In Progress
198	Project GP	20500000	20450000	97%	In Progress
199	Project GQ	20600000	20550000	97%	In Progress
200	Project GR	20700000	20650000	97%	In Progress
201	Project GS	20800000	20750000	97%	In Progress
202	Project GT	20900000	20850000	97%	In Progress
203	Project GU	21000000	20950000	97%	In Progress
204	Project GV	21100000	21050000	97%	In Progress
205	Project GW	21200000	21150000	97%	In Progress
206	Project GX	21300000	21250000	97%	In Progress
207	Project GY	21400000	21350000	97%	In Progress
208	Project GZ	21500000	21450000	97%	In Progress
209	Project HA	21600000	21550000	97%	In Progress
210	Project HB	21700000	21650000	97%	In Progress
211	Project HC	21800000	21750000	97%	In Progress
212	Project HD	21900000	21850000	97%	In Progress
213	Project HE	22000000	21950000	97%	In Progress
214	Project HF	22100000	22050000	97%	In Progress</

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Project Information		Financial Summary		Operational Data	
Project Name	Project ID	Budget	Actual Cost	Progress (%)	Completion Date
Project A	001	1000000	950000	95%	2023-12-31
Project B	002	2000000	1800000	90%	2024-01-15
Project C	003	1500000	1400000	93%	2024-02-01
Project D	004	800000	750000	94%	2024-02-10
Project E	005	1200000	1100000	92%	2024-02-20
Project F	006	900000	850000	94%	2024-03-05
Project G	007	1100000	1050000	95%	2024-03-15
Project H	008	700000	650000	93%	2024-03-25
Project I	009	1300000	1200000	92%	2024-04-01
Project J	010	600000	550000	92%	2024-04-10
Project K	011	1400000	1300000	93%	2024-04-20
Project L	012	500000	450000	90%	2024-05-01
Project M	013	1600000	1500000	94%	2024-05-10
Project N	014	400000	350000	88%	2024-05-20
Project O	015	1700000	1600000	94%	2024-06-01
Project P	016	300000	250000	83%	2024-06-10
Project Q	017	1900000	1800000	95%	2024-06-20
Project R	018	2500000	2300000	92%	2024-07-01
Project S	019	1800000	1700000	94%	2024-07-10
Project T	020	1000000	900000	90%	2024-07-20
Project U	021	750000	700000	93%	2024-08-01
Project V	022	1150000	1050000	91%	2024-08-10
Project W	023	650000	600000	92%	2024-08-20
Project X	024	1350000	1250000	93%	2024-09-01
Project Y	025	550000	500000	91%	2024-09-10
Project Z	026	1550000	1450000	94%	2024-09-20
Project AA	027	450000	400000	89%	2024-10-01
Project AB	028	1750000	1650000	94%	2024-10-10
Project AC	029	350000	300000	86%	2024-10-20
Project AD	030	1250000	1150000	92%	2024-11-01
Project AE	031	600000	550000	92%	2024-11-10
Project AF	032	1450000	1350000	93%	2024-11-20
Project AG	033	500000	450000	90%	2024-12-01
Project AH	034	1650000	1550000	94%	2024-12-10
Project AI	035	400000	350000	88%	2024-12-20
Project AJ	036	1850000	1750000	94%	2025-01-01
Project AK	037	2800000	2600000	93%	2025-01-10
Project AL	038	1950000	1850000	95%	2025-01-20
Project AM	039	700000	650000	93%	2025-02-01
Project AN	040	1100000	1000000	91%	2025-02-10
Project AO	041	600000	550000	92%	2025-02-20
Project AP	042	1300000	1200000	93%	2025-03-01
Project AQ	043	500000	450000	90%	2025-03-10
Project AR	044	1600000	1500000	94%	2025-03-20
Project AS	045	400000	350000	88%	2025-04-01
Project AT	046	1800000	1700000	94%	2025-04-10
Project AU	047	2500000	2300000	92%	2025-04-20
Project AV	048	1900000	1800000	95%	2025-05-01
Project AW	049	750000	700000	93%	2025-05-10
Project AX	050	1150000	1050000	91%	2025-05-20
Project AY	051	650000	600000	92%	2025-06-01
Project AZ	052	1350000	1250000	93%	2025-06-10
Project BA	053	550000	500000	91%	2025-06-20
Project BB	054	1550000	1450000	94%	2025-07-01
Project BC	055	450000	400000	89%	2025-07-10
Project BD	056	1750000	1650000	94%	2025-07-20
Project BE	057	350000	300000	86%	2025-08-01
Project BF	058	1250000	1150000	92%	2025-08-10
Project BG	059	600000	550000	92%	2025-08-20
Project BH	060	1450000	1350000	93%	2025-09-01
Project BI	061	500000	450000	90%	2025-09-10
Project BJ	062	1600000	1500000	94%	2025-09-20
Project BK	063	400000	350000	88%	2025-10-01
Project BL	064	1800000	1700000	94%	2025-10-10
Project BM	065	2500000	2300000	92%	2025-10-20
Project BN	066	1900000	1800000	95%	2025-11-01
Project BO	067	750000	700000	93%	2025-11-10
Project BP	068	1150000	1050000	91%	2025-11-20
Project BQ	069	650000	600000	92%	2025-12-01
Project BR	070	1350000	1250000	93%	2025-12-10
Project BS	071	550000	500000	91%	2025-12-20
Project BT	072	1550000	1450000	94%	2026-01-01
Project BU	073	450000	400000	89%	2026-01-10
Project BV	074	1750000	1650000	94%	2026-01-20
Project BW	075	350000	300000	86%	2026-02-01
Project BX	076	1250000	1150000	92%	2026-02-10
Project BY	077	600000	550000	92%	2026-02-20
Project BZ	078	1450000	1350000	93%	2026-03-01
Project CA	079	500000	450000	90%	2026-03-10
Project CB	080	1600000	1500000	94%	2026-03-20
Project CC	081	400000	350000	88%	2026-04-01
Project CD	082	1800000	1700000	94%	2026-04-10
Project CE	083	2500000	2300000	92%	2026-04-20
Project CF	084	1900000	1800000	95%	2026-05-01
Project CG	085	750000	700000	93%	2026-05-10
Project CH	086	1150000	1050000	91%	2026-05-20
Project CI	087	650000	600000	92%	2026-06-01
Project CJ	088	1350000	1250000	93%	2026-06-10
Project CK	089	550000	500000	91%	2026-06-20
Project CL	090	1550000	1450000	94%	2026-07-01
Project CM	091	450000	400000	89%	2026-07-10
Project CN	092	1750000	1650000	94%	2026-07-20
Project CO	093	350000	300000	86%	2026-08-01
Project CP	094	1250000	1150000	92%	2026-08-10
Project CQ	095	600000	550000	92%	2026-08-20
Project CR	096	1450000	1350000	93%	2026-09-01
Project CS	097	500000	450000	90%	2026-09-10
Project CT	098	1600000	1500000	94%	2026-09-20
Project CU	099	400000	350000	88%	2026-10-01
Project CV	100	1800000	1700000	94%	2026-10-10
Project CW	101	2500000	2300000	92%	2026-10-20
Project CX	102	1900000	1800000	95%	2026-11-01
Project CY	103	750000	700000	93%	2026-11-10
Project CZ	104	1150000	1050000	91%	2026-11-20
Project DA	105	650000	600000	92%	2026-12-01
Project DB	106	1350000	1250000	93%	2026-12-10
Project DC	107	550000	500000	91%	2026-12-20
Project DD	108	1550000	1450000	94%	2027-01-01
Project DE	109	450000	400000	89%	2027-01-10
Project DF	110	1750000	1650000	94%	2027-01-20
Project DG	111	350000	300000	86%	2027-02-01
Project DH	112	1250000	1150000	92%	2027-02-10
Project DI	113	600000	550000	92%	2027-02-20
Project DJ	114	1450000	1350000	93%	2027-03-01
Project DK	115	500000	450000	90%	2027-03-10
Project DL	116	1600000	1500000	94%	2027-03-20
Project DM	117	400000	350000	88%	2027-04-01
Project DN	118	1800000	1700000	94%	2027-04-10
Project DO	119	2500000	2300000	92%	2027-04-20
Project DP	120	1900000	1800000	95%	2027-05-01
Project DQ	121	750000	700000	93%	2027-05-10
Project DR	122	1150000	1050000	91%	2027-05-20
Project DS	123	650000	600000	92%	2027-06-01
Project DT	124	1350000	1250000	93%	2027-06-10
Project DU	125	550000	500000	91%	2027-06-20
Project DV	126	1550000	1450000	94%	2027-07-01
Project DW	127	450000	400000	89%	2027-07-10
Project DX	128	1750000	1650000	94%	2027-07-20
Project DY	129	350000	300000	86%	2027-08-01
Project DZ	130	1250000	1150000	92%	2027-08-10
Project EA	131	600000	550000	92%	2027-08-20
Project EB	132	1450000	1350000	93%	2027-09-01
Project EC	133	500000	450000	90%	2027-09-10
Project ED	134	1600000	1500000	94%	2027-09-20
Project EE	135	400000	350000	88%	2027-10-01
Project EF	136	1800000	1700000	94%	2027-10-10
Project EG	137	2500000	2300000	92%	2027-10-20
Project EH	138	1900000	1800000	95%	2027-11-01
Project EI	139	750000	700000	93%	2027-11-10
Project EJ	140	1150000	1050000	91%	2027-11-20
Project EK	141	650000	600000	92%	2027-12-01
Project EL	142	1350000	1250000	93%	2027-12-10
Project EM	143	550000	500000	91%	2027-12-20
Project EN	144	1550000	1450000	94%	2028-01-01
Project EO	145	450000	400000	89%	2028-01-10
Project EP	146	1750000	1650000	94%	2028-01-20
Project EQ	147	350000	300000	86%	2028-02-01
Project ER	148	1250000	1150000	92%	2028-02-10
Project ES	149	600000	550000	92%	2028-02-20
Project ET	150	1450000	1350000	93%	2028-03-01
Project EU	151	500000	450000	90%	2028-03-10
Project EV	152	1600000	1500000	94%	2028-03-20
Project EW	153	400000	350000	88%	2028-04-01
Project EX	154	1800000	1700000	94%	2028-04-10
Project EY	155	2500000	2300000	92%	2028-04-20
Project EZ	156	1900000	1800000	95%	2028-05-01
Project FA	157	750000	700000	93%	2028-05-10
Project FB	158	1150000	1050000	91%	2028-05-20
Project FC	159	650000	600000	92%	2028-06-01
Project FD	160	1350000	1250000	93%	2028-06-10
Project FE	161	550000	500000	91%	2028-06-20
Project FF	162	1550000	1450000	94%	2028-07-01
Project FG	163	450000	400000	89%	2028-07-10
Project FH	164	1750000	1650000	94%	2028-07-20
Project FI	165	350000	300000	86%	2028-08-01
Project FJ	166	1250000	1150000	92%	2028-08-10
Project FK	167	600000	550000	92%	2028-08-20
Project FL	168	1450000	1350000	93%	2028-09-01
Project FM	169	500000	450000	90%	2028-09-10
Project FN	170	1600000	1500000	94%	2028-09-20
Project FO	171	400000	350000	88%	2028-10-01
Project FP	172	1800000	1700000	94%	2028-10-10
Project FQ	173	2500000	2300000	92%	2028-10-20
Project FR	174	1900000	1800000	95%	2028-11-01
Project FS	175	750000	700000	93%	2028-11-10
Project FT	176	1150000	1050000	91%	2028-11-20
Project FU	177	650000	600000	92%	2028-12-01
Project FV	178	1350000	1250000	93%	2028-12-10
Project FW	179	550000	500000	91%	2028-12-20
Project FX	180	1550000	1450000	94%	2029-01-01
Project FY	181	450000	400000	89%	2029-01-10
Project FZ	182	1750000	1650000	94%	2029-01-20
Project GA	183	350000	300000	86%	2029-02-01
Project GB	184	1250000	1150000	92%	2029-02-10
Project GC	185	600000	550000	92%	2029-02-20
Project GD	186	1450000	1350000	93%	2029-03-01
Project GE	187	500000	450000	90%	2029-03-10
Project GF	188	1600000	1500000	94%	2029-03-20
Project GG	189	400000	350000	88%	2029-04-01
Project GH	190	1800000	1700000	94%	2029-04-10
Project GI	191	2500000	2300000		

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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%
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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)

2020 and 2021 Service Area

Issuer: QCC Insurance Company

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

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- 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.**

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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.**

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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**

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- **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
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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