



May 19, 2020

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

SUBMITTED VIA SERFF

**RE: Keystone Health Plan East
Small Group HMO Rate Filing effective 1/1/2021
INAC-132358832**

Dear Ms. Gray:

Attached is the 2021 annual rate filing for HMO plans of Keystone Health Plan East (KHPE), and Direct Point-of-Service (DPOS) plans, of which a large majority of benefit expenses is attributed to KHPE and the remainder to QCC Insurance Company (QCC), and offered to small employer groups in the Commonwealth of Pennsylvania. Rates for new and renewing plans are being filed and satisfy market reform requirements of the Affordable Care Act (ACA).

This rate filing includes rates for these plans and specifies compliance with rating requirements of the ACA. The enclosed is for rating periods effective from January 1, 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:	Keystone Health Plan East; 95056
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	-3.1% to 8.5%
7.	Total Annual Revenue Generated from the Proposed Rate Change	\$6,460,555
8.	Products	HMO
9.	Rating Areas and Change from 2020	Rating Area 8; No Change
10.	Metal Levels and Catastrophic Plans	Platinum, Gold, Silver, Bronze



- | | | |
|-----|--|--|
| 11. | Current covered lives and policyholders as of February 1, 2020 | 110,253 lives |
| 12. | Number of plans offered in 2021 and change from 2020 | 21 plans in 2021; 21 plans in 2020 |
| 13. | Corresponding contract form number, SERFF, and binder numbers | SERFF # INBC-132357845
See appendix for form numbers. |
| 14. | HIOS Issuer ID # and submission tracking Number | HIOS Issuer ID # 33871; Filing # 33871-1751467485967847431 |

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

Sincerely,

[REDACTED]

cc:

[REDACTED]



APPENDIX

Form Numbers

KE 670 WPR GMC Rev. 1.21
KE 670 SG EXC-OFF Rev. 1.21
KE 670 SG EXC-OFF.Direct Rev. 1.21
KE 670 SG EXC-OFF.Tier Rev. 1.21
PREV/SCH-II Rev. 1.21

Attachment I

Rate Change Summary

Keystone Health Plan East – Small Group Plans

Rate request filing ID # INAC-132358777 - 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:	-3.1% to 8.5%
Effective date:	January 1, 2021
Mapped Members:	110,253
Available in:	Area 8

Key information

Jan. 2019-Dec. 2019 financial experience

Premiums	\$647,879,911
Claims	\$534,599,580
Administrative expenses	\$76,666,000
Taxes & fees	\$16,221,464
Company made (after taxes)	\$20,392,867

How it plans to spend your premium

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

Claims:	82.9%
Administrative:	14.6%
Taxes & fees:	0.5%
Profit:	2.0%

The company expects its annual medical costs to increase **8.9%**.

Explanation of requested rate change

Keystone Health Plan East ("KHPE") is revising premium rates for the Pennsylvania Small Group ACA compliant products, effective from January 1, 2021.

About 110,000 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:

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

Changes in Benefits:

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

Administrative Costs:

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

PENNSYLVANIA ACTUARIAL MEMORANDUM

PURPOSES

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

1. BASIC INFORMATION AND DATA

A. COMPANY INFORMATION

Company Legal Name:	Keystone Health Plan East ("KHPE")
State:	Pennsylvania
NAIC #:	95056
Market:	Small Group
Marketplace:	Off Exchange
Effective Date(s):	1/1/2021-3/31/2021, 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:	-3.1% to 8.5%
Products:	HMO
Rating Areas:	Rating Area 8
Metal Levels:	Platinum, Gold, Silver, Bronze
Current Members:	110,253
Number of 2021 Plans:	21
HIOS Issuer ID (5-digit):	33871

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

COMPANY CONTACT INFORMATION

Primary Contact Name:	[REDACTED]
Primary Contact Telephone Number:	[REDACTED]

Primary Contact Email Address:



B. RATE HISTORY AND PROPOSED VARIATIONS IN RATE CHANGES

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

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 0.9%. 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 -0.85%.

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 KHPE in the Commonwealth of Pennsylvania, including out-of-network claims written by KHPE but paid by QCC for POS plans. No private reinsurance was applicable.

Projected Risk Adjustment PMPM

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

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

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

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

No plans are being terminated in 2021.

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		15.73%
General and Claims	9.57%	
Agent/Broker Fees and Commissions	5.36%	
Quality Improvement Initiatives	0.80%	
Taxes and Fees		0.49%
Risk Adjustment User Fee	0.03%	
PCORI Fee	0.04%	
PA Premium Tax	0.00%	
Federal Income Tax	0.42%	
Health Insurance Providers Fee	0.00%	
Profit/Contingency		2.00%
Total Retention		18.22%

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

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

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

- The projected index rate is:
 - In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.08(d)(1) and 147.106);
 - Developed in compliance with applicable Actuarial Standards of Practice;
 - Reasonable in relation to the benefits provided and the population anticipated to be covered; and
 - Neither excessive nor deficient.
- The index rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan level rates.

- The percent of total premium that represents essential health benefits included in Worksheet 2, Sections III and IV were calculated in accordance with actuarial standards of practice.
- The AV Calculator was used to determine the AV Metal Values illustrated in Worksheet 2 of the Part I Unified Rate Review Template for all plans, unless an alternate methodology was required. If an alternate methodology was used to calculate the AV Metal Value for at least one plan offered, a copy of the actuarial certification required by 45 CFR Part 156, §156.135 will be included.
- All factor, benefit, and other changes from the prior approved filing have been disclosed in the actuarial memorandum.
- New plans cannot be considered modifications of existing plans under the uniform modification standards in 45 CFR 147.106.
- The information presented in the PA Actuarial Memorandum and PA Actuarial Memorandum Rate Exhibits is consistent with the information presented in the 2021 Rate Filing Justification.

May 19, 2020

PA Rate Template Part I
Data Relevant to the Rate Filing

Table 0. Identifying Information

Carrier Name:	KeyStone Health Plan East		
Product(s):	HMO		
Market Segment:	Small Group		
Rate Effective Date:	1/1/2021	to	12/31/2021
Rate Period Start Date:	1/1/2019	to	12/31/2019
Date of Most Recent Membership:	7/1/2020		

Table 1. Number of Members

	Member-months Experience Period	Members Current Period (as of 02-01-2020)	Member-months Projected Rating Period
	36.4	35.5	35.5
Average Age			
Total	1,310,000	110,253	5,123,036
<18	124,477	10,853	229,786
18-24	118,633	9,786	117,432
25-29	147,159	11,100	144,004
30-34	158,716	11,177	154,124
35-39	145,231	10,145	121,740
40-44	153,550	9,900	109,400
45-49	109,729	8,133	100,506
50-54	121,600	10,317	111,809
55-59	110,655	10,970	111,232
60-69	52,119	7,496	64,132
70+	16,264	2,400	11,420

Table 2. Experience Period Claims and Premiums

Earned Premium	Paid Claims	Ultimate Incurred Claims	Member Months	Estimated Cost Sharing (Member % HMO)	Allowed Claims (Non-Capitated)	Non-ERB portion of Allowed Claims	Total Prescription Drug Rebates*	Total ERB Capitalization	Total Non-ERB Capitalization	Estimated Risk Adjustment	Estimated Reinsurance Recoveries
\$ 625,445,240.11	\$ 441,290,538.45	\$ 349,743,049.48	1,310,000	44.76% (36.11)	\$ 140,364,550.73		\$ 110,400,871.40	\$ 112,825,864.10	\$ 4,973,687.19	\$ 198,004,148.43	\$
Experience Period Total Allowed ERB Claims + ERB Capitalization (PMPM) (net of prescription drug rebates)											\$ 455.95
Exp Ratio											\$1,250

*Express Prescription Drug Rebatess as a negative number

Table 3. Trend Components

Service Category	Cost*	Utilization*	Induced Demand*	Composite Trend*	Weight*
Emergency Hospital	1.83%	5.89%	0.00%	9.53%	17.33%
Emergency Hospital	1.54%	5.89%	0.00%	9.68%	17.71%
Professional	7.61%	5.89%	0.00%	9.65%	71.42%
Other Medical	2.81%	5.89%	0.00%	8.65%	0.00%
Capitation				0.46%	14.71%
Prescription Drugs	2.08%	5.89%	0.00%	1.68%	22.83%
Total Annual Trend				6.22%	100.00%
Months of Trend				24	
Total Applied Trend Projection Factor				1.146	

*Express Cost, Utilization, Induced Utilization and Weight as percentages
** Should equal UBR Trend

Table 4. Historical Experience

Month-Year	Total Annual Premium	Incurred Claims	Completion Factors*	Ultimate Incurred Claims	Members	Ultimate Incurred PMPM	Estimated Annual Cost Sharing (Member % HMO)	Prescription Drug Rebatess**	Allowed Claims (Net of Prescription Drug Rebatess)	Allowed PMPM
Jan-16	\$	\$5,118,239.45	1.0000	\$5,118,239.45	124,486	\$	316.41	\$	45,271,095.39	\$66.87
Feb-16	\$	\$5,851,324.45	1.0000	\$5,851,324.45	125,157	\$	305.51	\$	45,705,131.71	\$66.87
Mar-16	\$	\$6,420,172.87	1.0000	\$6,420,172.87	124,143	\$	350.16	\$	45,147,864.24	\$65.84
Apr-16	\$	\$6,241,539.02	1.0000	\$6,241,539.02	123,187	\$	349.75	\$	44,678,701.74	\$65.43
May-16	\$	\$6,853,829.48	1.0000	\$6,853,829.48	123,084	\$	314.13	\$	44,815,053.80	\$65.31
Jun-16	\$	\$6,407,200.78	1.0000	\$6,407,200.78	122,766	\$	344.07	\$	44,730,424.54	\$66.97
Jul-16	\$	\$7,400,000.40	1.0000	\$7,400,000.40	122,406	\$	360.86	\$	44,445,107.11	\$68.36
Aug-16	\$	\$7,704,938.06	1.0000	\$7,704,938.06	122,117	\$	350.21	\$	43,665,787.22	\$65.82
Sep-16	\$	\$8,554,775.05	1.0000	\$8,554,775.05	121,121	\$	336.57	\$	44,411,214.57	\$66.75
Oct-16	\$	\$8,484,477.24	1.0000	\$8,484,477.24	120,086	\$	316.20	\$	44,145,764.28	\$67.58
Nov-16	\$	\$7,280,326.54	1.0000	\$7,280,326.54	120,289	\$	309.80	\$	43,807,788.65	\$66.55
Dec-16	\$	\$5,089,732.76	1.0000	\$5,089,732.76	120,359	\$	300.08	\$	43,838,751.80	\$66.53
Jan-17	\$	\$5,473,527.18	1.0000	\$5,473,527.18	120,404	\$	310.34	\$	45,814,588.20	\$68.23
Feb-17	\$	\$5,751,636.94	1.0000	\$5,751,636.94	120,524	\$	280.37	\$	45,448,907.51	\$67.55
Mar-17	\$	\$6,756,332.17	1.0000	\$6,756,332.17	119,980	\$	331.44	\$	44,783,886.01	\$67.30
Apr-17	\$	\$6,364,653.33	1.0000	\$6,364,653.33	119,391	\$	295.34	\$	44,869,364.94	\$67.30
May-17	\$	\$6,117,706.57	1.0000	\$6,117,706.57	119,064	\$	318.81	\$	44,742,427.44	\$66.90
Jun-17	\$	\$7,113,188.24	1.0000	\$7,113,188.24	119,178	\$	312.05	\$	44,445,121.16	\$68.39
Jul-17	\$	\$6,701,185.24	1.0000	\$6,701,185.24	118,501	\$	295.88	\$	43,127,114.41	\$65.81
Aug-17	\$	\$6,343,032.69	1.0000	\$6,343,032.69	118,334	\$	332.47	\$	43,654,808.54	\$67.89
Sep-17	\$	\$6,768,184.26	1.0000	\$6,768,184.26	118,108	\$	310.88	\$	43,407,146.81	\$67.21
Oct-17	\$	\$7,438,382.04	1.0000	\$7,438,382.04	118,074	\$	335.70	\$	43,118,527.80	\$67.03
Nov-17	\$	\$7,310,163.70	1.0000	\$7,310,163.70	117,301	\$	316.40	\$	42,800,098.56	\$66.89
Dec-17	\$	\$4,998,622.16	1.0000	\$4,998,622.16	116,568	\$	300.28	\$	43,434,544.45	\$66.63
Jan-18	\$	\$7,351,538.09	1.0000	\$7,351,538.09	115,724	\$	324.37	\$	43,643,883.47	\$67.74
Feb-18	\$	\$6,851,228.87	1.0000	\$6,851,228.87	114,786	\$	303.09	\$	43,100,833.34	\$66.65
Mar-18	\$	\$5,592,985.65	1.0000	\$5,592,985.65	113,438	\$	313.77	\$	43,232,750.47	\$63.48
Apr-18	\$	\$7,030,391.47	1.0000	\$7,030,391.47	112,773	\$	298.81	\$	43,361,739.34	\$65.49
May-18	\$	\$7,038,810.99	1.0000	\$7,038,810.99	111,764	\$	330.45	\$	43,874,324.35	\$69.21
Jun-18	\$	\$5,895,400.02	1.0000	\$5,895,400.02	110,511	\$	322.54	\$	43,284,457.15	\$67.33
Jul-18	\$	\$5,784,670.16	1.0000	\$5,784,670.16	109,688	\$	305.71	\$	43,144,782.61	\$67.50
Aug-18	\$	\$6,491,733.81	1.0000	\$6,491,733.81	109,391	\$	324.45	\$	42,711,441.87	\$67.24
Sep-18	\$	\$6,492,094.78	1.0000	\$6,492,094.78	109,161	\$	317.80	\$	42,807,170.86	\$67.68
Oct-18	\$	\$6,936,773.18	1.0000	\$6,936,773.18	108,963	\$	339.92	\$	42,558,611.49	\$69.48
Nov-18	\$	\$6,820,761.00	1.0000	\$6,820,761.00	108,803	\$	314.97	\$	42,179,456.03	\$68.09
Dec-18	\$	\$4,343,829.11	1.0000	\$4,343,829.11	107,277	\$	314.10	\$	42,022,921.41	\$66.74
Jan-19	\$	\$6,093,122.31	0.9999	\$6,093,122.31	106,877	\$	328.10	\$	41,637,088.72	\$66.30
Feb-19	\$	\$5,818,722.81	0.9999	\$5,818,722.81	105,861	\$	298.18	\$	41,148,256.74	\$64.83
Mar-19	\$	\$6,032,950.08	0.9999	\$6,032,950.08	105,448	\$	326.54	\$	42,127,117.17	\$64.93
Apr-19	\$	\$7,420,579.03	0.9998	\$7,420,579.03	105,201	\$	339.36	\$	42,129,368.16	\$65.63
May-19	\$	\$7,484,726.87	0.9978	\$7,484,726.87	104,224	\$	343.01	\$	41,684,336.13	\$69.67
Jun-19	\$	\$3,205,701.84	0.9991	\$3,205,701.84	103,719	\$	305.06	\$	41,461,558.81	\$64.78
Jul-19	\$	\$5,418,171.30	0.9991	\$5,418,171.30	103,467	\$	331.35	\$	41,705,309.21	\$65.13
Aug-19	\$	\$6,311,632.06	0.9911	\$6,311,632.06	103,751	\$	333.20	\$	41,822,224.24	\$66.56
Sep-19	\$	\$6,466,092.03	0.9813	\$6,466,092.03	103,666	\$	325.16	\$	41,635,371.80	\$67.05
Oct-19	\$	\$6,361,230.41	0.9730	\$6,361,230.41	103,708	\$	340.43	\$	41,132,738.88	\$66.45
Nov-19	\$	\$5,743,733.77	0.9648	\$5,743,733.77	103,730	\$	318.47	\$	40,805,242.01	\$65.90
Dec-19	\$	\$3,611,126.64	0.9184	\$3,611,126.64	103,811	\$	322.72	\$	41,436,860.61	\$64.80

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

PA Rate Template Part II
Rate Development and Change

Carrier Name: Keystone Health Plan East
 Product(s): HMO
 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	\$ 465.95	\$ -	< Actual Experience PMPM should be consistent with the Index Rate for Experience Period on URRT
Two year trend projection factor	1.128	1.000	
Unadjusted Projected Allowed EHB Claims PMPM	\$ 525.71	\$ -	
Single Risk Pool Adjustment Factors			
Change in Morbidity - Impact of Reinsurance Program	1.000	1.000	
Change in Morbidity - All Other	1.010		< See URRT Instructions
Total Non-Morbidity Changes	1.011	0.000	
Change in Demographics	1.008		< See URRT Instructions
Change in Network	1.003		< See URRT Instructions
Change in Benefits	1.000		< See URRT Instructions
Change in Other	1.000		< See URRT Instructions
Total Adjusted Projected Allowed EHB Claims PMPM	\$ 536.72	\$ -	
Credibility Factors	100%	0%	< See Instructions
Blended Projected EHB Claims PMPM		\$ 536.72	< Projected Index Rate
Development of the Market-Adjusted Index Rate and Total Allowed Claims			
Adjusted Projected Allowed EHB Claims PMPM	\$ 536.72		< Index Rate for Projection Period on URRT
Projected Paid to Allowed Ratio	0.780		
Projected Incurred EHB Claims PMPM	\$ 418.78		
Market-wide Adjustments			
Projected Incurred Risk Adjustment PMPM	-526.56		
Projected Incurred Exchange User Fees PMPM	50.00		
Projected Incurred Reinsurance Recoveries PMPM	50.00		
Market-Adjusted Projected Incurred EHB Claims PMPM	\$ 445.34		
Market-Adjusted Projected Allowed EHB Claims PMPM	\$ 570.76		< Market-Adjusted Index Rate
Projected Allowed Non-EHB Claims PMPM	\$ 5.43		
Market-Adjusted Projected Incurred Total Claims PMPM	\$ 449.58		
Market-Adjusted Projected Allowed Total Claims PMPM	\$ 576.20		

Table 6. Retention

Retention Items - Express in percentages	Percentages	PMPM Amounts
Administrative Expenses	15.73%	\$86.50
General and Claims	5.57%	\$32.62
Agent/Broker Fees and Commissions	5.36%	\$29.48
Quality Improvement Initiatives	0.80%	\$4.40
Taxes and Fees	0.50%	\$2.75
Risk Adjustment User Fee	0.05%	\$0.25
PCORI Fee	0.04%	\$0.20
PA Premium & Other Taxes (if applicable)	0.00%	\$0.00
Federal Income Tax	0.42%	\$2.31
Health Insurance Providers Fee (Priorated for Small Groups only)	0.00%	\$0.00
Profit/Contingency (after tax)	2.00%	\$11.00
Total Retention	18.23%	\$100.25
Projected Required Revenue PMPM		\$ 549.81

Table 8. Components of Rate Change

Rate Components	2020	2021	Difference	Percent Change
A. Calibrated Plan Adjusted Index Rate (PMPM)	\$ 364.85	\$ 368.08	\$ 3.23	0.9%
B. Base period allowed claims before normalization	\$ 454.35	\$ 465.95	\$ 11.59	2.2%
C. Normalization factor component of change	\$ (154.75)	\$ (158.00)	\$ (3.25)	-0.9%
D. Change in Normalized Allowed Claims Adjustment Components				
D1. Base period allowed claims after normalization	\$ 299.60	\$ 307.95	\$ 8.34	2.3%
D2. URRT Trend	\$ 22.99	\$ 39.50	\$ 16.51	4.5%
D3. URRT Morbidity	\$ -	\$ 3.47	\$ 3.47	1.0%
D4. URRT Other	\$ 7.47	\$ 3.80	\$ (3.67)	-1.0%
D5. Normalized URRT Risk Adjustment on an allowed basis	\$ 11.32	\$ 22.50	\$ 11.18	3.1%
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)	\$ 341.38	\$ 377.22	\$ 35.84	9.8%
E. Change in Allowable Plan Adjusted Level Components				
E1. Network	\$ -	\$ -	\$ -	0.0%
E2. Pricing AV	\$ (58.51)	\$ (82.89)	\$ (24.38)	-6.7%
E3. Benefit Richness	\$ (0.02)	\$ 0.00	\$ 0.02	0.0%
E4. Catastrophic Eligibility	\$ -	\$ -	\$ -	0.0%
E5. Subtotal - Sum(E1-E4)	\$ (58.53)	\$ (82.89)	\$ (24.36)	-6.7%
F. Change in Retention Components				
F1. Administrative Expenses	\$ 57.54	\$ 57.91	\$ 0.37	0.1%
F2. Taxes and Fees	\$ 14.12	\$ 1.84	\$ (12.28)	-3.4%
F3. Profit and/or Contingency	\$ 7.30	\$ 7.36	\$ 0.06	0.0%
F4. Subtotal - Sum(F1-F3)	\$ 78.96	\$ 67.11	\$ (11.84)	-3.2%
G. Change in Miscellaneous Items	\$ -	\$ -	\$ -	0.0%
H. Sum of Components of Rate Change (should approximate the change shown in line A)	\$ 361.80	\$ 361.44	\$ (0.36)	-0.1%

For Informational Purposes only - No input required.

Blended Base Period Unadjusted Claims before Normalization	\$ 465.95	< Index Rate of Experience Period on URRT
Blended Earned Premium	\$ 676,249,629.13	
Blended Loss Ratio	82.52%	

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	\$ 475,521.00	\$ 273,441.00	\$ 221,948.00	\$ 339,150.00	1,310,060
Adjusted Projected Allowed EHB Claims PMPM	\$ 536.72	\$ 536.72	\$ 536.72	\$ 536.72	\$ 536.72
Months of Trend	-	3	6	9	
Annual Trend	6.22%	6.22%	6.22%	6.22%	
Single Risk Pool Projected Allowed Claims	\$ 536.72	\$ 644.88	\$ 653.16	\$ 661.57	\$ 474.64
Quarterly Trend Factor	1.000	1.015	1.031	1.046	1.020

Table 7. Normalized Market-Adjusted Projected Allowed Total Claims

Normalization Factors	2020	2021
Average Age Factor	\$ 1.50	\$ 1.50
Average Geographic Factor	\$ 1.00	\$ 1.00
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	\$ 529.66	\$ 576.20
Normalized Market-Adjusted Projected Allowed Total Claims PMPM	\$ 349.26	\$ 380.81

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

	2020	2021	
Paid-to-Allowed	0.829	0.780	
URRT Trend (Total Allowed Trend Factor)	1.077	1.128	< URRT W1, S2
URRT Morbidity	1.000	1.010	< URRT W1, S2
URRT "Other"	1.028	1.011	< URRT W1, S2
Risk Adjustment	\$ 14.22	\$ 26.56	< URRT W1, S3
Exchange User Fee	\$ -	\$ -	< URRT W1, S3
Reinsurance Recoveries	\$ -	\$ -	< URRT W1, S3
Capitation	\$ -	\$ -	< URRT W1, S2
Network	1.000	1.000	
Pricing AV	0.829	0.780	< For 2020 in cell J81, please include a factor equal to the product of the average Pricing AV and the Non-Funding of CSR Adjustment
Benefit Richness	1.000	1.000	
Catastrophic Eligibility	1.000	1.000	
Administrative Expenses	15.73%	15.73%	
Taxes and Fees	2.87%	0.50%	
Profit and/or Contingency	2.00%	2.00%	

Carrier Name:	Keystone Health Plan East
Product(s):	HMO
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:	\$ 570.76

Total Covered Lives @ 02-01-2020	110,253
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02-01-2020 Number of Covered Lives by Rating Area										
										2021 Continued/ Discontinued Plans Indicator
1	2	3	4	5	6	7	8	9	Total	

PA Rate Template Part IV B - Small Group Annual
Table 11. Plan Premium Development for 21-Year-Old Non-Tobacco User

Carrier Name:	Ernst+Young Health Plan Ltd
Product(s):	EMD
Market Segment:	Small Business
Wife Effective Date:	1/1/2010

Date/Day	WGS Plant ID/Location	CC/Location	WGS Plant ID/Location	CC/Location	WGS Plant ID/Location	CC/Location	WGS Plant ID/Location	CC/Location	WGS Plant ID/Location	CC/Location	WGS Plant ID/Location	CC/Location	WGS Plant ID/Location	CC/Location	WGS Plant ID/Location	CC/Location	WGS Plant ID/Location	CC/Location	WGS Plant ID/Location	CC/Location	Step 1: 2000 - 2005 (WGS Plant ID/Location)												Step 2: 2006 - 2010 (WGS Plant ID/Location)												Step 3: 2011 - 2015 (WGS Plant ID/Location)												Step 4: 2016 - 2020 (WGS Plant ID/Location)												Step 5: 2021 - 2025 (WGS Plant ID/Location)												Step 6: 2026 - 2030 (WGS Plant ID/Location)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
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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	2100	2101	2102	2103	2104	2105	2106	2107	2108	2109	2110	2111	2112	2113	2114	2115	2116	2117	2118	2119	2120	2121	2122	2123	2124	2125	2126	2127	2128	2129	2130	2131	2132	2133	2134	2135	2136	2137	2138	2139	2140	2141	2142	2143	2144	2145	2146	2147	2148	2149	2150	2151	2152	2153	2154	2155	2156	2157	2158	2159	2160	2161	2162	2163	2164	2165	2166	2167	2168	2169	2170	2171	2172	2173	2174	2175	2176	2177	2178	2179	2180	2181	2182	2183	2184	2185	2186	2187	2188	2189	2190	2191	2192	2193	2194	2195	2196	2197	2198	2199	2200	2201	2202	2203	2204	2205	2206	2207	2208	2209	2210	2211	2212	2213	2214	2215	2216	2217	2218	2219	2220	2221	2222	2223	2224	2225	2226	2227	2228	2229	2230	2231	2232	2233	2234	2235	2236	2237	2238	2239	2240	2241	2242	2243	2244	2245	2246	2247	2248	2249	2250	2251	2252	2253	2254	2255	2256	2257	2258	2259	2260	2261	2262	2263	2264	2265	2266	2267	2268	2269	2270	2271	2272	2273	2274	2275	2276	2277	2278	2279	2280	2281	2282	2283	2284	2285	2286	2287	2288	2289	2290	2291	2292	2293	2294	2295	2296	2297	2298	2299	2300	2301	2302	2303	2304	2305	2306	2307	2308	2309	2310	2311	2312	2313	2314	2315	2316	2317	2318	2319	2320	2321	2322	2323	2324	2325	2326	2327	2328	2329	2330	2331	2332	2333	2334	2335	2336	2337	2338	2339	2340	2341	2342	2343	2344	2345	2346	2347	2348	2349	2350	2351	2352	2353	2354	2355	2356	2357	2358	2359	2360	2361	2362	2363	2364	2365	2366	2367	2368	2369	2370	2371	2372	2373	2374	2375	2376	2377	2378	2379	2380	2381	2382	2383	2384	2385	2386	2387	2388	2389	2390	2391	2392	2393	2394	2395	2396	2397	2398	2399	2400	2401	2402	2403	2404	2405	2406	2407	2408	2409	2410	2411	2412	2413	2414	2415	2416	2417	2418	2419	2420	2421	2422	2423	2424	2425	2426	2427	2428	2429	2430	2431	2432	2433	2434	2435	2436	2437	2438	2439	2440	2441	2442	2443	2444	2445	2446	2447	2448	2449	2450	2451	2452	2453	2454	2455	2456	2457	2458	2459	2460	2461	2462	2463	2464	2465	2466	2467	2468	2469	2470	2471	2472	2473	2474	2475	2476	2477	2478	2479	2480	2481	2482	2483	2484	2485	2486	2487	2488	2489	2490	2491	2492	2493	2494	2495	2496	2497	2498	2499	2500	2501	2502	2503	2504	2505	2506	2507	2508	2509	2510	2511	2512	2513	2514	2515	2516	2517	2518	2519	2520	2521	2522	2523	2524	2525	2526	2527	2528	2529	2530	2531	2532	2533	2534	2535	2536	2537	2538	2539	2540	2541	2542	2543	2544	2545	2546	2547	2548	2549	2550	2551	2552	2553	2554	2555	2556	2557	2558	2559	2560	2561	2562	2563	2564	2565	2566	2567	2568	2569	2570	2571	2572	2573	2574	2575	2576	2577	2578	2579	2580	2581	2582	2583	2584	2585	2586	2587	2588	2589	2590	2591	2592	2593	2594	2595	2596	2597	2598	2599	2600	2601	2602	2603	2604	2605	2606	2607	2608	2609	2610	2611	2612	2613	2614	2615	2616	2617	2618	2619	2620	2621	2622	2623	2624	2625	2626	2627	2628	2629	2630	2631	2632	2633	2634	2635	2636	2637	2638	2639	2640	2641	2642	2643	2644	2645	2646	2647	2648	2649	2650	2651	2652	2653	2654	2655	2656	2657	2658	2659	2660	2661	2662	2663	2664	2665	2666	2667	2668	2669	2670	2671	2672	2673	2674	2675	2676	2677	2678	2679	2680	2681	2682	2683	2684	2685	2686	2687	2688	2689	2690	2691	2692	2693	2694	2695	2696	2697	2698	2699	2700	2701	2702	2703	2704	2705	2706	2707	2708	2709	2710	2711	2712	2713	2714	2715	2716	2717	2718	2719	2720	2721	2722	2723	2724	2725	2726	2727	2728	2729	2730	2731	2732	2733	2734	2735	2736	2737	2738	2739	2740	2741	2742	2743	2744	2745	2746	2747	2748	2749	2750	2751	2752	2753	2754	2755	2756	2757	2758	2759	2760	2761	2762	2763	2764	2765	2766	2767	2768	2769	2770	2771	2772	2773	2774	2775	2776	2777	2778	2779	2780	2781	2782	2783	2784	2785	2786	2787	2788	2789	2790	2791	2792	2793	2794	2795	2796	2797	2798	2799	2800	2801	2802	2803	2804	2805	2806	2807	2808	2809	2810	2811	2812	2813	2814	2815	2816	2817	2818	2819	2820	2821	2822	2823	2824	2825	2826	2827	2828	2829	2830	2831	2832	2833	2834	2835	2836	2837	2838	2839	2840	2841	2842	2843	2844	2845	2846	2847	2848	2849	2850	2851	2852	2853	2854	2855	2856	2857	2858	2859	2860	2861	2862	2863	2864	2865	2866	2867	2868	2869	2870	2871	2872	2873	2874	2875	2876	2877	2878	2879	2880	2881	2882	2883	2884	2885	2886	2887	2888	2889	2890	2891	2892	2893	2894	2895	2896	2897	2898	2899	2900	2901	2902	2903	2904	2905	2906	2907	2908	2909	2910	2911	2912	2913	2914	2915	2

PA Rate Quarterly Template Part V Consumer Factors

Carrier Name:	Keystone Health Plan East
Product(s):	HMO
Market Segment:	Small Group
Rate Effective Date:	1/1/2021

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]

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

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

Company Name	Keystone Health Plan East
Market	Small Group

[illegible]

Company Name: Pharmaceutical Plan 01		Market: PHARM		Product: PHARM	
Effective Date of Rates: 01/01/2025		Ending date of Rates: 01/01/2025		01/01/2025	
HHS Plan 01 (01/01/2025)		3877PA010001	3877PA010002	3877PA010003	3877PA010004
HHS Plan 02 (01/01/2025)		3877PA010005	3877PA010006	3877PA010007	3877PA010008
HHS Plan 03 (01/01/2025)		3877PA010009	3877PA010010	3877PA010011	3877PA010012
HHS Plan 04 (01/01/2025)		3877PA010013	3877PA010014	3877PA010015	3877PA010016
HHS Plan 05 (01/01/2025)		3877PA010017	3877PA010018	3877PA010019	3877PA010020
HHS Plan 06 (01/01/2025)		3877PA010021	3877PA010022	3877PA010023	3877PA010024
HHS Plan 07 (01/01/2025)		3877PA010025	3877PA010026	3877PA010027	3877PA010028
HHS Plan 08 (01/01/2025)		3877PA010029	3877PA010030	3877PA010031	3877PA010032
HHS Plan 09 (01/01/2025)		3877PA010033	3877PA010034	3877PA010035	3877PA010036
HHS Plan 10 (01/01/2025)		3877PA010037	3877PA010038	3877PA010039	3877PA010040
HHS Plan 11 (01/01/2025)		3877PA010041	3877PA010042	3877PA010043	3877PA010044
HHS Plan 12 (01/01/2025)		3877PA010045	3877PA010046	3877PA010047	3877PA010048
HHS Plan 13 (01/01/2025)		3877PA010049	3877PA010050	3877PA010051	3877PA010052
HHS Plan 14 (01/01/2025)		3877PA010053	3877PA010054	3877PA010055	3877PA010056
HHS Plan 15 (01/01/2025)		3877PA010057	3877PA010058	3877PA010059	3877PA010060
HHS Plan 16 (01/01/2025)		3877PA010061	3877PA010062	3877PA010063	3877PA010064
HHS Plan 17 (01/01/2025)		3877PA010065	3877PA010066	3877PA010067	3877PA010068
HHS Plan 18 (01/01/2025)		3877PA010069	3877PA010070	3877PA010071	3877PA010072
HHS Plan 19 (01/01/2025)		3877PA010073	3877PA010074	3877PA010075	3877PA010076
HHS Plan 20 (01/01/2025)		3877PA010077	3877PA010078	3877PA010079	3877PA010080
HHS Plan 21 (01/01/2025)		3877PA010081	3877PA010082	3877PA010083	3877PA010084
HHS Plan 22 (01/01/2025)		3877PA010085	3877PA010086	3877PA010087	3877PA010088
HHS Plan 23 (01/01/2025)		3877PA010089	3877PA010090	3877PA010091	3877PA010092
HHS Plan 24 (01/01/2025)		3877PA010093	3877PA010094	3877PA010095	3877PA010096
HHS Plan 25 (01/01/2025)		3877PA010097	3877PA010098	3877PA010099	3877PA010100
HHS Plan 26 (01/01/2025)		3877PA010101	3877PA010102	3877PA010103	3877PA010104
HHS Plan 27 (01/01/2025)		3877PA010105	3877PA010106	3877PA010107	3877PA010108
HHS Plan 28 (01/01/2025)		3877PA010109	3877PA010110	3877PA010111	3877PA010112
HHS Plan 29 (01/01/2025)		3877PA010113	3877PA010114	3877PA010115	3877PA010116
HHS Plan 30 (01/01/2025)		3877PA010117	3877PA010118	3877PA010119	3877PA010120
HHS Plan 31 (01/01/2025)		3877PA010121	3877PA010122	3877PA010123	3877PA010124
HHS Plan 32 (01/01/2025)		3877PA010125	3877PA010126	3877PA010127	3877PA010128
HHS Plan 33 (01/01/2025)		3877PA010129	3877PA010130	3877PA010131	3877PA010132
HHS Plan 34 (01/01/2025)		3877PA010133	3877PA010134	3877PA010135	3877PA010136
HHS Plan 35 (01/01/2025)		3877PA010137	3877PA010138	3877PA010139	3877PA010140
HHS Plan 36 (01/01/2025)		3877PA010141	3877PA010142	3877PA010143	3877PA010144
HHS Plan 37 (01/01/2025)		3877PA010145	3877PA010146	3877PA010147	3877PA010148
HHS Plan 38 (01/01/2025)		3877PA010149	3877PA010150	3877PA010151	3877PA010152
HHS Plan 39 (01/01/2025)		3877PA010153	3877PA010154	3877PA010155	3877PA010156
HHS Plan 40 (01/01/2025)		3877PA010157	3877PA010158	3877PA010159	3877PA010160
HHS Plan 41 (01/01/2025)		3877PA010161	3877PA010162	3877PA010163	3877PA010164
HHS Plan 42 (01/01/2025)		3877PA010165	3877PA010166	3877PA010167	3877PA010168
HHS Plan 43 (01/01/2025)		3877PA010169	3877PA010170	3877PA010171	3877PA010172
HHS Plan 44 (01/01/2025)		3877PA010173	3877PA010174	3877PA010175	3877PA010176
HHS Plan 45 (01/01/2025)		3877PA010177	3877PA010178	3877PA010179	3877PA010180
HHS Plan 46 (01/01/2025)		3877PA010181	3877PA010182	3877PA010183	3877PA010184
HHS Plan 47 (01/01/2025)		3877PA010185	3877PA010186	3877PA010187	3877PA010188
HHS Plan 48 (01/01/2025)		3877PA010189	3877PA010190	3877PA010191	3877PA010192
HHS Plan 49 (01/01/2025)		3877PA010193	3877PA010194	3877PA010195	3877PA010196
HHS Plan 50 (01/01/2025)		3877PA010197	3877PA010198	3877PA010199	3877PA010200
HHS Plan 51 (01/01/2025)		3877PA010201	3877PA010202	3877PA010203	3877PA010204
HHS Plan 52 (01/01/2025)		3877PA010205	3877PA010206	3877PA010207	3877PA010208
HHS Plan 53 (01/01/2025)		3877PA010209	3877PA010210	3877PA010211	3877PA010212
HHS Plan 54 (01/01/2025)		3877PA010213	3877PA010214	3877PA010215	3877PA010216
HHS Plan 55 (01/01/2025)		3877PA010217	3877PA010218	3877PA010219	3877PA010220
HHS Plan 56 (01/01/2025)		3877PA010221	3877PA010222	3877PA010223	3877PA010224
HHS Plan 57 (01/01/2025)		3877PA010225	3877PA010226	3877PA010227	3877PA010228
HHS Plan 58 (01/01/2025)		3877PA010229	3877PA010230	3877PA010231	3877PA010232
HHS Plan 59 (01/01/2025)		3877PA010233	3877PA010234	3877PA010235	3877PA010236
HHS Plan 60 (01/01/2025)		3877PA010237	3877PA010238	3877PA010239	3877PA010240
HHS Plan 61 (01/01/2025)		3877PA010241	3877PA010242	3877PA010243	3877PA010244
HHS Plan 62 (01/01/2025)		3877PA010245	3877PA010246	3877PA010247	3877PA010248
HHS Plan 63 (01/01/2025)		3877PA010249	3877PA010250	3877PA010251	3877PA010252
HHS Plan 64 (01/01/2025)		3877PA010253	3877PA010254	3877PA010255	3877PA010256
HHS Plan 65 (01/01/2025)		3877PA010257	3877PA010258	3877PA010259	3877PA010260
HHS Plan 66 (01/01/2025)		3877PA010261	3877PA010262	3877PA010263	3877PA010264
HHS Plan 67 (01/01/2025)		3877PA010265	3877PA010266	3877PA010267	3877PA010268
HHS Plan 68 (01/01/2025)		3877PA010269	3877PA010270	3877PA010271	3877PA010272
HHS Plan 69 (01/01/2025)		3877PA010273	3877PA010274	3877PA010275	3877PA010276
HHS Plan 70 (01/01/2025)		3877PA010277	3877PA010278	3877PA010279	3877PA010280
HHS Plan 71 (01/01/2025)		3877PA010281	3877PA010282	3877PA010283	3877PA010284
HHS Plan 72 (01/01/2025)		3877PA010285	3877PA010286	3877PA010287	3877PA010288
HHS Plan 73 (01/01/2025)		3877PA010289	3877PA010290	3877PA010291	3877PA010292
HHS Plan 74 (01/01/2025)		3877PA010293	3877PA010294	3877PA010295	3877PA010296
HHS Plan 75 (01/01/2025)		3877PA010297	3877PA010298	3877PA010299	3877PA010300
HHS Plan 76 (01/01/2025)		3877PA010301	3877PA010302	3877PA010303	3877PA010304
HHS Plan 77 (01/01/2025)		3877PA010305	3877PA010306	3877PA010307	3877PA010308
HHS Plan 78 (01/01/2025)		3877PA010309	3877PA010310	3877PA010311	3877PA010312
HHS Plan 79 (01/01/2025)		3877PA010313	3877PA010314	3877PA010315	3877PA010316
HHS Plan 80 (01/01/2025)		3877PA010317	3877PA010318	3877PA010319	3877PA010320
HHS Plan 81 (01/01/2025)		3877PA010321	3877PA010322	3877PA010323	3877PA010324
HHS Plan 82 (01/01/2025)		3877PA010325	3877PA010326	3877PA010327	3877PA010328
HHS Plan 83 (01/01/2025)		3877PA010329	3877PA010330	3877PA010331	3877PA010332
HHS Plan 84 (01/01/2025)		3877PA010333	3877PA010334	3877PA010335	3877PA010336
HHS Plan 85 (01/01/2025)		3877PA010337	3877PA010338	3877PA010339	3877PA010340
HHS Plan 86 (01/01/2025)		3877PA010341	3877PA010342	3877PA010343	3877PA010344
HHS Plan 87 (01/01/2025)		3877PA010345	3877PA010346	3877PA010347	3877PA010348
HHS Plan 88 (01/01/2025)		3877PA010349	3877PA010350	3877PA010351	3877PA010352
HHS Plan 89 (01/01/2025)		3877PA010353	3877PA010354	3877PA010355	3877PA010356
HHS Plan 90 (01/01/2025)		3877PA010357	3877PA010358	3877PA010359	3877PA010360
HHS Plan 91 (01/01/2025)		3877PA010361	3877PA010362	3877PA010363	3877PA010364
HHS Plan 92 (01/01/2025)		3877PA010365	3877PA010366	3877PA010367	3877PA010368
HHS Plan 93 (01/01/2025)		3877PA010369	3877PA010370	3877PA010371	3877PA010372
HHS Plan 94 (01/01/2025)		3877PA010373	3877PA010374	3877PA010375	3877PA010376
HHS Plan 95 (01/01/2025)		3877PA010377	3877PA010378	3877PA010379	3877PA010380
HHS Plan 96 (01/01/2025)		3877PA010381	3877PA010382	3877PA010383	3877PA010384
HHS Plan 97 (01/01/2025)		3877PA010385	3877PA010386	3877PA010387	3877PA010388
HHS Plan 98 (01/01/2025)		3877PA010389	3877PA010390	3877PA010391	3877PA010392
HHS Plan 99 (01/01/2025)		3877PA010393	3877PA010394	3877PA010395	3877PA010396
HHS Plan 100 (01/01/2025)		3877PA010397	3877PA010398	3877PA010399	3877PA010400
HHS Plan 101 (01/01/2025)		3877PA010401	3877PA010402	3877PA010403	3877PA010404
HHS Plan 102 (01/01/2025)		3877PA010405	3877PA010406	3877PA010407	3877PA010408
HHS Plan 103 (01/01/2025)		3877PA010409	3877PA010410	3877PA010411	3877PA010412
HHS Plan 104 (01/01/2025)		3877PA010413	3877PA010414	3877PA010415	3877PA010416
HHS Plan 105 (01/01/2025)		3877PA010417	3877PA010418	3877PA010419	3877PA010420
HHS Plan 106 (01/01/2025)		3877PA010421	3877PA010422	3877PA010423	3877PA010424
HHS Plan 107 (01/01/2025)		3877PA010425	3877PA010426	3877PA010427	3877PA010428
HHS Plan 108 (01/01/2025)		3877PA010429	3877PA010430	3877PA010431	3877PA010432
HHS Plan 109 (01/01/2025)		3877PA010433	3877PA010434	3877PA010435	3877PA010436
HHS Plan 110 (01/01					

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

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

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

[illegible]

12/24/2014

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

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

Company Name	Keystone Health Plan East
Market	Small Group

Q1-Q2 2020 Number of Complaints by Spelling Category			ACTUAL #1 (A)										ACTUAL #2 (B)										ACTUAL #3 (C)										ACTUAL #4 (D)										ACTUAL #5 (E)										ACTUAL #6 (F)										ACTUAL #7 (G)										ACTUAL #8 (H)										ACTUAL #9 (I)										ACTUAL #10 (J)										ACTUAL #11 (K)										ACTUAL #12 (L)										ACTUAL #13 (M)										ACTUAL #14 (N)										ACTUAL #15 (O)										ACTUAL #16 (P)										ACTUAL #17 (Q)										ACTUAL #18 (R)										ACTUAL #19 (S)										ACTUAL #20 (T)										ACTUAL #21 (U)										ACTUAL #22 (V)										ACTUAL #23 (W)										ACTUAL #24 (X)										ACTUAL #25 (Y)										ACTUAL #26 (Z)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
Spelling	Category	Count	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	A16	A17	A18	A19	A20	A21	A22	A23	A24	A25	A26	A27	A28	A29	A30	A31	A32	A33	A34	A35	A36	A37	A38	A39	A40	A41	A42	A43	A44	A45	A46	A47	A48	A49	A50	A51	A52	A53	A54	A55	A56	A57	A58	A59	A60	A61	A62	A63	A64	A65	A66	A67	A68	A69	A70	A71	A72	A73	A74	A75	A76	A77	A78	A79	A80	A81	A82	A83	A84	A85	A86	A87	A88	A89	A90	A91	A92	A93	A94	A95	A96	A97	A98	A99	A100	A101	A102	A103	A104	A105	A106	A107	A108	A109	A110	A111	A112	A113	A114	A115	A116	A117	A118	A119	A120	A121	A122	A123	A124	A125	A126	A127	A128	A129	A130	A131	A132	A133	A134	A135	A136	A137	A138	A139	A140	A141	A142	A143	A144	A145	A146	A147	A148	A149	A150	A151	A152	A153	A154	A155	A156	A157	A158	A159	A160	A161	A162	A163	A164	A165	A166	A167	A168	A169	A170	A171	A172	A173	A174	A175	A176	A177	A178	A179	A180	A181	A182	A183	A184	A185	A186	A187	A188	A189	A190	A191	A192	A193	A194	A195	A196	A197	A198	A199	A200	A201	A202	A203	A204	A205	A206	A207	A208	A209	A210	A211	A212	A213	A214	A215	A216	A217	A218	A219	A220	A221	A222	A223	A224	A225	A226	A227	A228	A229	A230	A231	A232	A233	A234	A235	A236	A237	A238	A239	A240	A241	A242	A243	A244	A245	A246	A247	A248	A249	A250	A251	A252	A253	A254	A255	A256	A257	A258	A259	A260	A261	A262	A263	A264	A265	A266	A267	A268	A269	A270	A271	A272	A273	A274	A275	A276	A277	A278	A279	A280	A281	A282	A283	A284	A285	A286	A287	A288	A289	A290	A291	A292	A293	A294	A295	A296	A297	A298	A299	A300	A301	A302	A303	A304	A305	A306	A307	A308	A309	A310	A311	A312	A313	A314	A315	A316	A317	A318	A319	A320	A321	A322	A323	A324	A325	A326	A327	A328	A329	A330	A331	A332	A333	A334	A335	A336	A337	A338	A339	A340	A341	A342	A343	A344	A345	A346	A347	A348	A349	A350	A351	A352	A353	A354	A355	A356	A357	A358	A359	A360	A361	A362	A363	A364	A365	A366	A367	A368	A369	A370	A371	A372	A373	A374	A375	A376	A377	A378	A379	A380	A381	A382	A383	A384	A385	A386	A387	A388	A389	A390	A391	A392	A393	A394	A395	A396	A397	A398	A399	A400	A401	A402	A403	A404	A405	A406	A407	A408	A409	A410	A411	A412	A413	A414	A415	A416	A417	A418	A419	A420	A421	A422	A423	A424	A425	A426	A427	A428	A429	A430	A431	A432	A433	A434	A435	A436	A437	A438	A439	A440	A441	A442	A443	A444	A445	A446	A447	A448	A449	A450	A451	A452	A453	A454	A455	A456	A457	A458	A459	A460	A461	A462	A463	A464	A465	A466	A467	A468	A469	A470	A471	A472	A473	A474	A475	A476	A477	A478	A479	A480	A481	A482	A483	A484	A485	A486	A487	A488	A489	A490	A491	A492	A493	A494	A495	A496	A497	A498	A499	A500	A501	A502	A503	A504	A505	A506	A507	A508	A509	A510	A511	A512	A513	A514	A515	A516	A517	A518	A519	A520	A521	A522	A523	A524	A525	A526	A527	A528	A529	A530	A531	A532	A533	A534	A535	A536	A537	A538	A539	A540	A541	A542	A543	A544	A545	A546	A547	A548	A549	A550	A551	A552	A553	A554	A555	A556	A557	A558	A559	A560	A561	A562	A563	A564	A565	A566	A567	A568	A569	A570	A571	A572	A573	A574	A575	A576	A577	A578	A579	A580	A581	A582	A583	A584	A585	A586	A587	A588	A589	A590	A591	A592	A593	A594	A595	A596	A597	A598	A599	A600	A601	A602	A603	A604	A605	A606	A607	A608	A609	A610	A611	A612	A613	A614	A615	A616	A617	A618	A619	A620	A621	A622	A623	A624	A625	A626	A627	A628	A629	A630	A631	A632	A633	A634	A635	A636	A637	A638	A639	A640	A641	A642	A643	A644	A645	A646	A647	A648	A649	A650	A651	A652	A653	A654	A655	A656	A657	A658	A659	A660	A661	A662	A663	A664	A665	A666	A667	A668	A669	A670	A671	A672	A673	A674	A675	A676	A677	A678	A679	A680	A681	A682	A683	A684	A685	A686	A687	A688	A689	A690	A691	A692	A693	A694	A695	A696	A697	A698	A699	A700	A701	A702	A703	A704	A705	A706	A707	A708	A709	A710	A711	A712	A713	A714	A715	A716	A717	A718	A719	A720	A721	A722	A723	A724	A725	A726	A727	A728	A729	A730	A731	A732	A733	A734	A735	A736	A737	A738	A739	A740	A741	A742	A743	A744	A745	A746	A747	A748	A749	A750	A751	A752	A753	A754	A755	A756	A757	A758	A759	A760	A761	A762	A763	A764	A765	A766	A767	A768	A769	A770	A771	A772	A773	A774	A775	A776	A777	A778	A779	A780	A781	A782	A783	A784	A785	A786	A787	A788	A789	A790	A791	A792	A793	A794	A795	A796	A797	A798	A799	A800	A801	A802	A803	A804	A805	A806	A807	A808	A809	A810	A811	A812	A813	A814	A815	A816	A817	A818	A819	A820	A821	A822	A823	A824	A825	A826	A827	A828	A829	A830	A831	A832	A833	A834	A835	A836	A837	A838	A839	A840	A841	A842	A843	A844	A845	A846	A847	A848	A849	A850	A851	A852	A853	A854	A855	A856	A857	A858	A859	A860	A861	A862	A863	A864	A865	A866	A867	A868	A869	A870	A871	A872	A873	A874	A875	A876	A877	A878	A879	A880	A881	A882	A883	A884	A885	A886	A887	A888	A889	A890	A891	A892	A893	A894	A895	A896	A897	A898	A899	A900	A901	A902	A903	A904	A905	A906	A907	A908	A909	A910	A911	A912	A913	A914	A915	A916	A917	A918	A919	A920	A921	A922	A923	A924	A925	A926	A927	A928	A929	A930	A931	A932	A933	A934	A935	A936	A937	A938	A939	A940	A941	A942	A943	A944	A945	A946	A947	A948	A949	A950	A951	A952	A953	A954	A955	A956	A957	A958	A959	A960	A961	A962	A963	A964	A965	A966	A967	A968	A969	A970	A971	A972	A973	A974	A975	A976	A977	A978	A979	A980	A981	A982	A983	A984	A985	A986	A987	A988	A989	A990	A991	A992	A993	A994	A995	A996	A997	A998	A999	A1000

Page Number:

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

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

	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: Keystone Health Plan East																			State: PA	
4	HIOS Issuer ID: 33871																			Market: Small Group	To validate, select the Validate button or Ctrl + Shift + I.
5	Effective Date of Rate Change(s): 1/1/2021																			To finalize, select the Finalize button or Ctrl + Shift + F.	
6																					
7																					
8	Market Level Calculations (Same for all Plans)																				
9																					
10																					
11	Section I: Experience Period Data																				
12	Experience Period: 1/1/2019 to 12/31/2019																				
13																					
14	Allowed Claims \$610,416,618.51 PMPM \$465.95																				
15	Reinsurance \$0.00 \$0.00																				
16	Incurred Claims in Experience Period \$528,625,682.34 \$403.51																				
17	Risk Adjustment -\$28,369,718.43 -\$21.66																				
18	Experience Period Premium \$676,249,629.13 \$516.20																				
19	Experience Period Member Months 1,310,060																				
20																					
21	Section II: Projections																				
22																					
23	Benefit Category Experience Period Index Rate PMPM Year 1 Trend Cost Utilization Year 2 Trend Cost Utilization Trended EHB Allowed Claims PMPM																				
24	Inpatient Hospital \$80.75 1.034 1.059 1.034 1.059 \$96.82																				
25	Outpatient Hospital \$82.53 1.036 1.059 1.036 1.059 \$99.34																				
26	Professional \$109.14 1.026 1.059 1.026 1.059 \$128.85																				
27	Other Medical \$0.00 1.026 1.059 1.026 1.059 \$0.00																				
28	Capitation \$87.19 1.000 0.995 1.000 0.995 \$86.32																				
29	Prescription Drug \$106.33 0.979 1.059 0.979 1.059 \$114.29																				
30	Total \$465.94 \$525.62																				
31																					
32	Morbidity Adjustment 1.010																				
33	Demographic Shift 1.008																				
34	Plan Design Changes 1.000																				
35	Other 1.003																				
36	Adjusted Trended EHB Allowed Claims PMPM for 1/1/2021 \$536.73																				
37																					
38	Manual EHB Allowed Claims PMPM \$0.00																				
39	Applied Credibility % 100.00%																				
40																					
41																					
42	Projected Index Rate for 1/1/2021 \$536.73 \$710,113,112.28																				
43	Reinsurance \$0.00 \$0.00																				
44	Risk Adjustment Payment/Charge -\$34.04 -\$45,036,145.44																				
45	Exchange User Fees 0.00% \$0.00																				
46	Market Adjusted Index Rate \$570.77 \$755,149,257.72																				
47																					
48	Projected Member Months 1,323,036																				
49																					
50	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.																				
51																					

Product-Plan Data Collection

Company Legal Name: Keystone Health Plan East
HMO's Issued ID: 38871
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 + V.
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		Keystone HMO Small Group															Keystone OPOS Small Group														
1.1	Product Name																														
1.2	Product ID	3871PA0010																													
1.3	Plan Name	Keystone HMO															Keystone OPOS														
1.4	Plan ID (Standard Component ID)	3871PA0010001															3871PA0010001														
1.5	Plan Type	HMO															HMO														
1.6	AV Metal Value	0.919															0.919														
1.7	Plan Category	HMO															HMO														
1.8	Plan Type	HMO															HMO														
1.9	Exchange Plan?	No															No														
1.10	Effective Date of Proposed Rates	1/1/2021															1/1/2021														
1.11	Cumulative Rate Change % (over 12 mos. prior)	4.38%															4.38%														
1.12	Product Rate Increase %	4.48%															4.48%														
1.13	Submission Level Rate Increase %	4.48%															4.48%														
Worksheet 1 Totals		Section II: Experience Period and Current Plan Level Information																													
2.1 Plan ID (Standard Component ID)		3871PA0010001																													
2.2 Allowed Claims		5610.416.619																													
2.3 Reinsurance		50																													
2.4 Member Cost Sharing		581.780.916																													
2.5 Cost Sharing Reduction		50																													
2.6 Incurred Claims		5228.625.682																													
2.7 Risk Adjustment Transfer Amount		528.169.718																													
2.8 Premium		5676.249.679																													
2.9 Projected Member Months		1.110.040																													
2.10 Current Enrollment		1.110.040																													
2.11 Current Premium PHM		1500.91																													
2.12 Loss Ratio		81.09%																													
Per Member Per Month		Section III: Plan Adjustment Factors																													
2.13 Administrative Expense		5460.95																													
2.14 Reinsurance		50.00																													
2.15 Member Cost Sharing		581.780.916																													
2.16 Cost Sharing Reduction		50.00																													
2.17 Incurred Claims		5460.91																													
2.18 Risk Adjustment Transfer Amount		521.66																													
2.19 Premium		5516.20																													
Section III: Plan Adjustment Factors		Section III: Plan Adjustment Factors																													
3.1 Plan ID (Standard Component ID)		3871PA0010001																													
3.2 Market Adjusted Index Rate		1.0721																													
3.3 AV and Cost Sharing Design of Plan		1.0452																													
3.4 Provider Network Adjustment		1.0006																													
3.5 Benefits in Addition to H&H		1.0006																													
Administrative Costs		1.0006																													
3.6 Administrative Expense		1.0006																													
3.7 Taxes and Fees		1.0006																													
3.8 Profit & Risk Load		1.0006																													
3.9 Catastrophic Adjustment		1.0006																													
3.10 Plan Adjusted Index Rate		1.0006																													
3.11 Age Calibration Factor		0.6651																													
3.12 Geographic Calibration Factor		1.0000																													
3.13 Tobacco Calibration Factor		0.9987																													
3.14 Calibrated Plan Adjusted Index Rate		0.9987																													
Section IV: Projected Plan Level Information		Section IV: Projected Plan Level Information																													
4.1 Plan ID (Standard Component ID)		3871PA0010001																													
4.2 Allowed Claims		5610.416.619																													
4.3 Reinsurance		50																													
4.4 Member Cost Sharing		581.780.916																													
4.5 Cost Sharing Reduction		50																													
4.6 Incurred Claims		5228.625.682																													
4.7 Risk Adjustment Transfer Amount		528.169.718																													
4.8 Premium		5676.249.679																													
4.9 Projected Member Months		1.110.040																													
4.10 Loss Ratio		81.09%																													
Per Member Per Month		Section III: Plan Adjustment Factors																													
4.11 Administrative Expense		5460.95																													
4.12 Reinsurance		50.00																													
4.13 Member Cost Sharing		581.780.916																													
4.14 Cost Sharing Reduction		50.00																													
4.15 Incurred Claims		5460.91																													
4.16 Risk Adjustment Transfer Amount		521.66																													
4.17 Premium		5516.20																													

Rating Area Data Collection

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

Rating Area	Rating Factor
Rating Area 8	1.0000

URRT Part II – Consumer Friendly Justification

Scope and Range of the Rate Increase:

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

About 110,000 members will be affected.

Financial Experience of the Product:

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

Changes in Taxes and Fees:

The Federal government ended the Health Insurance Providers Fee beginning with premiums due in 2021. 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. More than 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
33871PA0100020	Keystone HMO Platinum Preferred \$10/\$20/\$200	1.3%	5.7%	7.0%	8.3%
33871PA0100021	Keystone HMO Platinum Preferred \$20/\$40/\$250	1.5%	5.9%	7.2%	8.4%
33871PA0100022	Keystone HMO Gold Preferred \$40/\$80/\$650	1.3%	5.7%	7.0%	8.2%
33871PA0100023	Keystone HMO Gold Classic \$1,500/\$30/\$60/90%	1.2%	5.6%	6.9%	8.1%
33871PA0100024	Keystone HMO Silver Classic \$4,750/\$30/\$60/70%	0.8%	5.3%	6.5%	7.8%
33871PA0100025	Keystone HMO Silver Classic \$3,750/\$30/\$60/50%	-0.2%	4.2%	5.5%	6.7%
33871PA0100026	Keystone HMO Bronze Essential \$7,500/\$70/\$140/\$700	-3.1%	1.2%	2.4%	3.6%
33871PA0110011	Keystone DPOS Platinum Preferred \$10/\$20/\$200	1.3%	5.7%	7.0%	8.2%
33871PA0110012	Keystone DPOS Platinum Preferred \$20/\$40/\$250	1.5%	5.9%	7.2%	8.4%
33871PA0110013	Keystone DPOS Gold Preferred \$40/\$80/\$650	1.3%	5.7%	7.0%	8.2%
33871PA0110014	Keystone DPOS Gold Classic \$1,500/\$30/\$60/90%	1.2%	5.6%	6.9%	8.1%
33871PA0110019	Keystone DPOS Silver Classic \$3,750/\$30/\$60/50%	-0.2%	4.2%	5.5%	6.7%
33871PA0110020	Keystone DPOS Bronze Essential \$7,500/\$70/\$140/\$700	-3.1%	1.2%	2.3%	3.5%
33871PA0100044	Keystone HMO Gold Proactive	1.5%	5.9%	7.2%	8.4%
33871PA0100045	Keystone HMO Silver Proactive	0.1%	4.5%	5.7%	7.0%
33871PA0100047	Keystone HMO Gold Classic \$2,500/\$40/\$80/100%	0.5%	5.0%	6.2%	7.5%
33871PA0100048	Keystone HMO Silver Classic \$4,500/\$50/\$100/100%	1.1%	5.6%	6.8%	8.1%
33871PA0100049	Keystone HMO Silver Secure \$5,000/\$50/\$100/\$600	1.1%	5.6%	6.8%	8.1%
33871PA0100050	Keystone HMO Platinum Preferred \$30/\$60/\$400	1.5%	6.0%	7.3%	8.5%
33871PA0100051	Keystone HMO Gold Secure \$1000/\$40/\$80/\$650	1.3%	5.7%	7.0%	8.2%
33871PA0100052	Keystone HMO Silver Proactive Value	0.1%	4.5%	5.7%	7.0%

GENERAL OVERVIEW

PURPOSES

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

GENERAL INFORMATION

COMPANY IDENTIFYING INFORMATION

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

State: Pennsylvania

HIOS Issuer ID (5-digit): 33871

Market: Small Group

Effective Date(s): 1/1/2021-3/31/2021, 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 KHPE. Worksheet 2 contains experience period data and projections by product for the single risk pool for the same entities.

COMPANY CONTACT INFORMATION

Primary Contact Name:

Primary Contact Telephone Number:

Primary Contact Email Address:

PROPOSED RATE INCREASE

The changes to the single risk pool gross premium average rate per member per month (PMPM) from calendar year 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. More than half of the change in health care service costs is driven by changes to health care provider fees.

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

The weighted average increase across KHPE plans based on projected membership, inclusive of the impact of benefit and cost sharing changes, is 0.9%. The minimum increase is -3.1% and the maximum increase is 8.5%.

WORKSHEET 1: MARKET EXPERIENCE

SECTION I: EXPERIENCE PERIOD DATA

SINGLE RISK POOL

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

PAID THROUGH DATE

Experience period premium, claims, and member months are obtained from the company's internal data warehouse. The claims data is collected for incurred dates from January through December 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 KHPE in the Commonwealth of Pennsylvania.

PREMIUMS IN EXPERIENCE PERIOD

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

ALLOWED AND INCURRED CLAIMS INCURRED DURING THE EXPERIENCE PERIOD

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

Insurer fee-for-service claims expenses and member liabilities for dates of service in January 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 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 KHPE 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

No plans are being terminated during 2021.

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

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

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

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

[REDACTED]
May 19, 2020

Financial Statement									
Period		Revenue		Expenses		Profit		Balance	
Start	End	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget
2023-01-01	2023-01-31	100000	100000	50000	50000	50000	50000	50000	50000
2023-02-01	2023-02-28	120000	120000	60000	60000	60000	60000	110000	110000
2023-03-01	2023-03-31	150000	150000	75000	75000	75000	75000	185000	185000
2023-04-01	2023-04-30	180000	180000	90000	90000	90000	90000	275000	275000
2023-05-01	2023-05-31	200000	200000	100000	100000	100000	100000	375000	375000
2023-06-01	2023-06-30	220000	220000	110000	110000	110000	110000	485000	485000
2023-07-01	2023-07-31	250000	250000	125000	125000	125000	125000	610000	610000
2023-08-01	2023-08-31	280000	280000	140000	140000	140000	140000	750000	750000
2023-09-01	2023-09-30	300000	300000	150000	150000	150000	150000	900000	900000
2023-10-01	2023-10-31	320000	320000	160000	160000	160000	160000	1060000	1060000
2023-11-01	2023-11-30	350000	350000	175000	175000	175000	175000	1235000	1235000
2023-12-01	2023-12-31	380000	380000	190000	190000	190000	190000	1425000	1425000
2024-01-01	2024-01-31	400000	400000	200000	200000	200000	200000	1625000	1625000
2024-02-01	2024-02-28	420000	420000	210000	210000	210000	210000	1835000	1835000
2024-03-01	2024-03-31	450000	450000	225000	225000	225000	225000	2060000	2060000
2024-04-01	2024-04-30	480000	480000	240000	240000	240000	240000	2300000	2300000
2024-05-01	2024-05-31	500000	500000	250000	250000	250000	250000	2550000	2550000
2024-06-01	2024-06-30	520000	520000	260000	260000	260000	260000	2810000	2810000
2024-07-01	2024-07-31	550000	550000	275000	275000	275000	275000	3085000	3085000
2024-08-01	2024-08-31	580000	580000	290000	290000	290000	290000	3375000	3375000
2024-09-01	2024-09-30	600000	600000	300000	300000	300000	300000	3675000	3675000
2024-10-01	2024-10-31	620000	620000	310000	310000	310000	310000	3985000	3985000
2024-11-01	2024-11-30	650000	650000	325000	325000	325000	325000	4310000	4310000
2024-12-01	2024-12-31	680000	680000	340000	340000	340000	340000	4650000	4650000
2025-01-01	2025-01-31	700000	700000	350000	350000	350000	350000	5000000	5000000
2025-02-01	2025-02-28	720000	720000	360000	360000	360000	360000	5360000	5360000
2025-03-01	2025-03-31	750000	750000	375000	375000	375000	375000	5735000	5735000
2025-04-01	2025-04-30	780000	780000	390000	390000	390000	390000	6125000	6125000
2025-05-01	2025-05-31	800000	800000	400000	400000	400000	400000	6525000	6525000
2025-06-01	2025-06-30	820000	820000	410000	410000	410000	410000	6935000	6935000
2025-07-01	2025-07-31	850000	850000	425000	425000	425000	425000	7360000	7360000
2025-08-01	2025-08-31	880000	880000	440000	440000	440000	440000	7800000	7800000
2025-09-01	2025-09-30	900000	900000	450000	450000	450000	450000	8250000	8250000
2025-10-01	2025-10-31	920000	920000	460000	460000	460000	460000	8710000	8710000
2025-11-01	2025-11-30	950000	950000	475000	475000	475000	475000	9185000	9185000
2025-12-01	2025-12-31	980000	980000	490000	490000	490000	490000	9675000	9675000
2026-01-01	2026-01-31	1000000	1000000	500000	500000	500000	500000	10175000	10175000
2026-02-01	2026-02-28	1020000	1020000	510000	510000	510000	510000	10685000	10685000
2026-03-01	2026-03-31	1050000	1050000	525000	525000	525000	525000	11210000	11210000
2026-04-01	2026-04-30	1080000	1080000	540000	540000	540000	540000	11750000	11750000
2026-05-01	2026-05-31	1100000	1100000	550000	550000	550000	550000	12300000	12300000
2026-06-01	2026-06-30	1120000	1120000	560000	560000	560000	560000	12860000	12860000
2026-07-01	2026-07-31	1150000	1150000	575000	575000	575000	575000	13435000	13435000
2026-08-01	2026-08-31	1180000	1180000	590000	590000	590000	590000	14025000	14025000
2026-09-01	2026-09-30	1200000	1200000	600000	600000	600000	600000	14625000	14625000
2026-10-01	2026-10-31	1220000	1220000	610000	610000	610000	610000	15235000	15235000
2026-11-01	2026-11-30	1250000	1250000	625000	625000	625000	625000	15860000	15860000
2026-12-01	2026-12-31	1280000	1280000	640000	640000	640000	640000	16500000	16500000
2027-01-01	2027-01-31	1300000	1300000	650000	650000	650000	650000	17150000	17150000
2027-02-01	2027-02-28	1320000	1320000	660000	660000	660000	660000	17810000	17810000
2027-03-01	2027-03-31	1350000	1350000	675000	675000	675000	675000	18485000	18485000
2027-04-01	2027-04-30	1380000	1380000	690000	690000	690000	690000	19175000	19175000
2027-05-01	2027-05-31	1400000	1400000	700000	700000	700000	700000	19875000	19875000
2027-06-01	2027-06-30	1420000	1420000	710000	710000	710000	710000	20585000	20585000
2027-07-01	2027-07-31	1450000	1450000	725000	725000	725000	725000	21310000	21310000
2027-08-01	2027-08-31	1480000	1480000	740000	740000	740000	740000	22050000	22050000
2027-09-01	2027-09-30	1500000	1500000	750000	750000	750000	750000	22800000	22800000
2027-10-01	2027-10-31	1520000	1520000	760000	760000	760000	760000	23560000	23560000
2027-11-01	2027-11-30	1550000	1550000	775000	775000	775000	775000	24335000	24335000
2027-12-01	2027-12-31	1580000	1580000	790000	790000	790000	790000	25125000	25125000
2028-01-01	2028-01-31	1600000	1600000	800000	800000	800000	800000	25925000	25925000
2028-02-01	2028-02-28	1620000	1620000	810000	810000	810000	810000	26735000	26735000
2028-03-01	2028-03-31	1650000	1650000	825000	825000	825000	825000	27560000	27560000
2028-04-01	2028-04-30	1680000	1680000	840000	840000	840000	840000	28400000	28400000
2028-05-01	2028-05-31	1700000	1700000	850000	850000	850000	850000	29250000	29250000
2028-06-01	2028-06-30	1720000	1720000	860000	860000	860000	860000	30110000	30110000
2028-07-01	2028-07-31	1750000	1750000	875000	875000	875000	875000	30985000	30985000
2028-08-01	2028-08-31	1780000	1780000	890000	890000	890000	890000	31875000	31875000
2028-09-01	2028-09-30	1800000	1800000	900000	900000	900000	900000	32775000	32775000
2028-10-01	2028-10-31	1820000	1820000	910000	910000	910000	910000	33685000	33685000
2028-11-01	2028-11-30	1850000	1850000	925000	925000	925000	925000	34610000	34610000
2028-12-01	2028-12-31	1880000	1880000	940000	940000	940000	940000	35550000	35550000
2029-01-01	2029-01-31	1900000	1900000	950000	950000	950000	950000	36500000	36500000
2029-02-01	2029-02-28	1920000	1920000	960000	960000	960000	960000	37460000	37460000
2029-03-01	2029-03-31	1950000	1950000	975000	975000	975000	975000	38435000	38435000
2029-04-01	2029-04-30	1980000	1980000	990000	990000	990000	990000	39425000	39425000
2029-05-01	2029-05-31	2000000	2000000	1000000	1000000	1000000	1000000	40425000	40425000
2029-06-01	2029-06-30	2020000	2020000	1010000	1010000	1010000	1010000	41435000	41435000
2029-07-01	2029-07-31	2050000	2050000	1025000	1025000	1025000	1025000	42460000	42460000
2029-08-01	2029-08-31	2080000	2080000	1040000	1040000	1040000	1040000	43500000	43500000
2029-09-01	2029-09-30	2100000	2100000	1050000	1050000	1050000	1050000	44550000	44550000
2029-10-01	2029-10-31	2120000	2120000	1060000	1060000	1060000	1060000	45610000	45610000
2029-11-01	2029-11-30	2150000	2150000	1075000	1075000	1075000	1075000	46685000	46685000
2029-12-01	2029-12-31	2180000	2180000	1090000	1090000	1090000	1090000	47775000	47775000
2030-01-01	2030-01-31	2200000	2200000	1100000	1100000	1100000	1100000	48875000	48875000
2030-02-01	2030-02-28	2220000	2220000	1110000	1110000	1110000	1110000	49985000	49985000
2030-03-01	2030-03-31	2250000	2250000	1125000	1125000	1125000	1125000	51110000	51110000
2030-04-01	2030-04-30	2280000	2280000	1140000	1140000	1140000	1140000	52250000	52250000
2030-05-01	2030-05-31	2300000	2300000	1150000	1150000	1150000	1150000	53400000	53400000
2030-06-01	2030-06-30	2320000	2320000	1160000	1160000	1160000	1160000	54560000	54560000
2030-07-01	2030-07-31	2350000	2350000	1175000	1175000	1175000	1175000	55735000	55735000
2030-08-01	2030-08-31	2380000	2380000	1190000	1190000	1190000	1190000	56925000	56925000
2030-09-01	2030-09-30	2400000	2400000	1200000	1200000	1200000	1200000	58125000	58125000
2030-10-01	2030-10-31	2420000	2420000	1210000	1210000	1210000	1210000	59335000	59335000
2030-11-01	2030-11-30	2450000	2450000	1225000	1225000	1225000	1225000	60560000	60560000
2030-12-01									

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Project Information		Financial Summary		Operational Data		Compliance & Audit	
Project ID	Project Name	Budget (USD)	Actual Cost (USD)	Units Produced	Quality Score	Audit Status	Last Audit Date
001	Alpha Project	1000000	980000	15000	95	Pass	2023-10-26
002	Beta Project	2500000	2450000	30000	92	Pass	2023-10-26
003	Gamma Project	5000000	4900000	60000	90	Pass	2023-10-26
004	Delta Project	7500000	7300000	90000	88	Pass	2023-10-26
005	Epsilon Project	10000000	9700000	120000	85	Pass	2023-10-26
006	Zeta Project	15000000	14500000	180000	82	Pass	2023-10-26
007	Eta Project	20000000	19500000	240000	80	Pass	2023-10-26
008	Theta Project	25000000	24000000	300000	78	Pass	2023-10-26
009	Iota Project	30000000	29000000	360000	75	Pass	2023-10-26
010	Kappa Project	35000000	34000000	420000	72	Pass	2023-10-26
011	Lambda Project	40000000	39000000	480000	70	Pass	2023-10-26
012	Mu Project	45000000	44000000	540000	68	Pass	2023-10-26
013	Nu Project	50000000	49000000	600000	65	Pass	2023-10-26
014	Xi Project	55000000	54000000	660000	62	Pass	2023-10-26
015	Omicron Project	60000000	59000000	720000	60	Pass	2023-10-26
016	Pi Project	65000000	64000000	780000	58	Pass	2023-10-26
017	Rho Project	70000000	69000000	840000	55	Pass	2023-10-26
018	Sigma Project	75000000	74000000	900000	52	Pass	2023-10-26
019	Tau Project	80000000	79000000	960000	50	Pass	2023-10-26
020	Upsilon Project	85000000	84000000	1020000	48	Pass	2023-10-26
021	Phi Project	90000000	89000000	1080000	45	Pass	2023-10-26
022	Chi Project	95000000	94000000	1140000	42	Pass	2023-10-26
023	Psi Project	100000000	99000000	1200000	40	Pass	2023-10-26
024	Omega Project	105000000	104000000	1260000	38	Pass	2023-10-26
025	Alpha Project	110000000	109000000	1320000	35	Pass	2023-10-26
026	Beta Project	115000000	114000000	1380000	32	Pass	2023-10-26
027	Gamma Project	120000000	119000000	1440000	30	Pass	2023-10-26
028	Delta Project	125000000	124000000	1500000	28	Pass	2023-10-26
029	Epsilon Project	130000000	129000000	1560000	25	Pass	2023-10-26
030	Zeta Project	135000000	134000000	1620000	22	Pass	2023-10-26
031	Eta Project	140000000	139000000	1680000	20	Pass	2023-10-26
032	Theta Project	145000000	144000000	1740000	18	Pass	2023-10-26
033	Iota Project	150000000	149000000	1800000	15	Pass	2023-10-26
034	Kappa Project	155000000	154000000	1860000	12	Pass	2023-10-26
035	Lambda Project	160000000	159000000	1920000	10	Pass	2023-10-26
036	Mu Project	165000000	164000000	1980000	8	Pass	2023-10-26
037	Nu Project	170000000	169000000	2040000	5	Pass	2023-10-26
038	Xi Project	175000000	174000000	2100000	3	Pass	2023-10-26
039	Omicron Project	180000000	179000000	2160000	2	Pass	2023-10-26
040	Pi Project	185000000	184000000	2220000	1	Pass	2023-10-26
041	Rho Project	190000000	189000000	2280000	0	Pass	2023-10-26
042	Sigma Project	195000000	194000000	2340000	0	Pass	2023-10-26
043	Tau Project	200000000	199000000	2400000	0	Pass	2023-10-26
044	Upsilon Project	205000000	204000000	2460000	0	Pass	2023-10-26
045	Phi Project	210000000	209000000	2520000	0	Pass	2023-10-26
046	Chi Project	215000000	214000000	2580000	0	Pass	202

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Project Overview		Financial Summary		Operational Data		Compliance & Audit	
Project ID	Project Name	Budget (USD)	Actual Cost (USD)	Units Produced	Quality Score	Compliance Status	Audit Findings
001	Alpha Project	100000	98000	1500	95	Compliant	None
002	Beta Project	250000	260000	3000	88	Minor Issues	Documentation Gap
003	Gamma Project	500000	490000	6000	92	Compliant	None
004	Delta Project	750000	760000	9000	85	Major Issues	Safety Protocol Breach
005	Epsilon Project	1000000	990000	12000	90	Compliant	None
006	Zeta Project	1250000	1270000	15000	82	Major Issues	Resource Allocation Error
007	Eta Project	1500000	1480000	18000	88	Minor Issues	Communication Breakdown
008	Theta Project	1750000	1760000	21000	78	Major Issues	Timeline Miss
009	Iota Project	2000000	1990000	24000	85	Compliant	None
010	Kappa Project	2250000	2270000	27000	80	Minor Issues	Quality Control Lapse
011	Lambda Project	2500000	2510000	30000	75	Major Issues	Scope Creep
012	Mu Project	2750000	2760000	33000	70	Major Issues	Resource Shortage
013	Nu Project	3000000	2990000	36000	72	Major Issues	Communication Gap
014	Xi Project	3250000	3270000	39000	68	Major Issues	Timeline Delay
015	Omicron Project	3500000	3490000	42000	70	Minor Issues	Documentation Update
016	Pi Project	3750000	3760000	45000	65	Major Issues	Quality Defect
017	Rho Project	4000000	4010000	48000	60	Major Issues	Resource Mismanagement
018	Sigma Project	4250000	4270000	51000	58	Major Issues	Communication Failure
019	Tau Project	4500000	4490000	54000	55	Major Issues	Scope Expansion
020	Upsilon Project	4750000	4760000	57000	52	Major Issues	Resource Overload
021	Phi Project	5000000	5010000	60000	50	Major Issues	Timeline Critical
022	Chi Project	5250000	5270000	63000	48	Major Issues	Quality Concern
023	Psi Project	5500000	5490000	66000	45	Major Issues	Resource Conflict
024	Omega Project	5750000	5760000	69000	42	Major Issues	Communication Breakdown
025	Alpha Project	6000000	6010000	72000	40	Major Issues	Scope Creep
026	Beta Project	6250000	6270000	75000	38	Major Issues	Resource Shortage
027	Gamma Project	6500000	6490000	78000	35	Major Issues	Communication Gap
028	Delta Project	6750000	6760000	81000	32	Major Issues	Timeline Delay
029	Epsilon Project	7000000	7010000	84000	30	Major Issues	Quality Defect
030	Zeta Project	7250000	7270000	87000	28	Major Issues	Resource Mismanagement
031	Eta Project	7500000	7490000	90000	25	Major Issues	Communication Failure
032	Theta Project	7750000	7760000	93000	22	Major Issues	Scope Expansion
033	Iota Project	8000000	8010000	96000	20	Major Issues	Resource Overload
034	Kappa Project	8250000	8270000	99000	18	Major Issues	Timeline Critical
035	Lambda Project	8500000	8490000	102000	15	Major Issues	Quality Concern
036	Mu Project	8750000	8760000	105000	12	Major Issues	Resource Conflict
037	Nu Project	9000000	9010000	108000	10	Major Issues	Communication Breakdown
038	Xi Project	9250000	9270000	111000	8	Major Issues	Scope Creep
039	Omicron Project	9500000	9490000	114000	5	Major Issues	Resource Shortage
040	Pi Project	9750000	9760000	117000	3	Major Issues	Communication Gap
041	Rho Project	10000000	10010000	120000	2	Major Issues	Timeline Delay
042	Sigma Project	10250000	10270000	123000	1	Major Issues	Quality Defect
043	Tau Project	10500000	10490000	126000	0	Major Issues	Resource Mismanagement
044	Upsilon Project	10750000	10760000	129000	0	Major Issues	Communication Failure
045	Phi Project	11000000	11010000	132000	0	Major Issues	Scope Expansion
046	Chi Project	11250000	11270000	135000	0	Major Issues	Resource Overload
047	Psi Project	11500000	11490000	138000	0	Major Issues	Timeline Critical
048	Omega Project	11750000	11760000	141000	0	Major Issues	Quality Concern
049	Alpha Project	12000000	12010000	144000	0	Major Issues	Resource Conflict
050	Beta Project	12250000	12270000	147000	0	Major Issues	Communication Breakdown
051	Gamma Project	12500000	12490000	150000	0	Major Issues	Scope Creep
052	Delta Project	12750000	12760000	153000	0	Major Issues	Resource Shortage
053	Epsilon Project	13000000	12990000	156000	0	Major Issues	Communication Gap
054	Zeta Project	13250000	13270000	159000	0	Major Issues	Timeline Delay
055	Eta Project	13500000	13490000	162000	0	Major Issues	Quality Defect
056	Theta Project	13750000	13760000	165000	0	Major Issues	Resource Mismanagement
057	Iota Project	14000000	14010000	168000	0	Major Issues	Communication Failure
058	Kappa Project	14250000	14270000	171000	0	Major Issues	Scope Expansion
059	Lambda Project	14500000	14490000	174000	0	Major Issues	Resource Overload
060	Mu Project	14750000	14760000	177000	0	Major Issues	Timeline Critical
061	Nu Project	15000000	15010000	180000	0	Major Issues	Quality Concern
062	Xi Project	15250000	15270000	183000	0	Major Issues	Resource Conflict
063	Omicron Project	15500000	15490000	186000	0	Major Issues	Communication Breakdown
064	Pi Project	15750000	15760000	189000	0	Major Issues	Scope Creep
065	Rho Project	16000000	16010000	192000	0	Major Issues	Resource Shortage
066	Sigma Project	16250000	16270000	195000	0	Major Issues	Communication Gap
067	Tau Project	16500000	16490000	198000	0	Major Issues	Timeline Delay
068	Upsilon Project	16750000	16760000	201000	0	Major Issues	Quality Defect
069	Phi Project	17000000	17010000	204000	0	Major Issues	Resource Mismanagement
070	Chi Project	17250000	17270000	207000	0	Major Issues	Communication Failure
071	Psi Project	17500000	17490000	210000	0	Major Issues	Scope Expansion
072	Omega Project	17750000	17760000	213000	0	Major Issues	Resource Overload
073	Alpha Project	18000000	18010000	216000	0	Major Issues	Timeline Critical
074	Beta Project	18250000	18270000	219000	0	Major Issues	Quality Concern
075	Gamma Project	18500000	18490000	222000	0	Major Issues	Resource Conflict
076	Delta Project	18750000	18760000	225000	0	Major Issues	Communication Breakdown
077	Epsilon Project	19000000	19010000	228000	0	Major Issues	Scope Creep
078	Zeta Project	19250000	19270000	231000	0	Major Issues	Resource Shortage
079	Eta Project	19500000	19490000	234000	0	Major Issues	Communication Gap
080	Theta Project	19750000	19760000	237000	0	Major Issues	Timeline Delay
081	Iota Project	20000000	20010000	240000	0	Major Issues	Quality Defect
082	Kappa Project	20250000	20270000	243000	0	Major Issues	Resource Mismanagement
083	Lambda Project	20500000	20490000	246000	0	Major Issues	Communication Failure
084	Mu Project	20750000	20760000	249000	0	Major Issues	Scope Expansion
085	Nu Project	21000000	21010000	252000	0	Major Issues	Resource Overload
086	Xi Project	21250000	21270000	255000	0	Major Issues	Timeline Critical
087	Omicron Project	21500000	21490000	258000	0	Major Issues	Quality Concern
088	Pi Project	21750000	21760000	261000	0	Major Issues	Resource Conflict
089	Rho Project	22000000	22010000	264000	0	Major Issues	Communication Breakdown
090	Sigma Project	22250000	22270000	267000	0	Major Issues	Scope Creep
091	Tau Project	22500000	22490000	270000	0	Major Issues	Resource Shortage
092	Upsilon Project	22750000	22760000	273000	0	Major Issues	Communication Gap
093	Phi Project	23000000	23010000	276000	0	Major Issues	Timeline Delay
094	Chi Project	23250000	23270000	279000	0	Major Issues	Quality Defect
095	Psi Project	23500000	23490000	282000	0	Major Issues	Resource Mismanagement
096	Omega Project	23750000	23760000	285000	0	Major Issues	Communication Failure
097	Alpha Project	24000000	24010000	288000	0	Major Issues	Scope Expansion
098	Beta Project	24250000	24270000	291000	0	Major Issues	Resource Overload
099	Gamma Project	24500000	24490000	294000	0	Major Issues	Timeline Critical
100	Delta Project	24750000	24760000	297000	0	Major Issues	Quality Concern

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Project Overview		Financial Summary		Operational Data		Compliance & Audit	
Project ID	Project Name	Budget (USD)	Actual Cost (USD)	Units Produced	Quality Score	Audit Status	Last Audit Date
001	Alpha Project	1000000	980000	15000	95	Pass	2023-10-25
002	Beta Project	2500000	2600000	30000	88	Fail	2023-11-01
003	Gamma Project	500000	510000	8000	92	Pass	2023-10-15
004	Delta Project	750000	730000	12000	90	Pass	2023-11-10
005	Epsilon Project	1200000	1180000	18000	93	Pass	2023-10-20
006	Zeta Project	3000000	3100000	40000	85	Fail	2023-11-05
007	Eta Project	600000	620000	9000	91	Pass	2023-10-18
008	Theta Project	900000	890000	14000	94	Pass	2023-11-12
009	Iota Project	1500000	1480000	22000	96	Pass	2023-10-22
010	Kappa Project	2000000	2100000	28000	87	Fail	2023-11-03
011	Lambda Project	400000	410000	6000	93	Pass	2023-10-16
012	Mu Project	800000	790000	11000	91	Pass	2023-11-08
013	Nu Project	1100000	1090000	16000	94	Pass	2023-10-24
014	Xi Project	1800000	1850000	25000	86	Fail	2023-11-04
015	Omicron Project	3500000	3600000	45000	84	Fail	2023-11-06
016	Pi Project	550000	560000	7500	92	Pass	2023-10-19
017	Rho Project	700000	690000	10000	90	Pass	2023-11-11
018	Sigma Project	950000	940000	13000	93	Pass	2023-10-21
019	Tau Project	1300000	1280000	19000	95	Pass	2023-11-02
020	Upsilon Project	1700000	1750000	26000	89	Fail	2023-11-07
021	Phi Project	2200000	2180000	32000	91	Pass	2023-10-17
022	Chi Project	2800000	2900000	38000	87	Fail	2023-11-09
023	Psi Project	3200000	3300000	42000	85	Fail	2023-11-13
024	Omega Project	3800000	3900000	48000	83	Fail	2023-11-14
025	Alpha Project	1000000	980000	15000	95	Pass	2023-10-25
026	Beta Project	2500000	2600000	30000	88	Fail	2023-11-01
027	Gamma Project	500000	510000	8000	92	Pass	2023-10-15
028	Delta Project	750000	730000	12000	90	Pass	2023-11-10
029	Epsilon Project	1200000	1180000	18000	93	Pass	2023-10-20
030	Zeta Project	3000000	3100000	40000	85	Fail	2023-11-05
031	Eta Project	600000	620000	9000	91	Pass	2023-10-18
032	Theta Project	900000	890000	14000	94	Pass	2023-11-12
033	Iota Project	1500000	1480000	22000	96	Pass	2023-10-22
034	Kappa Project	2000000	2100000	28000	87	Fail	2023-11-03
035	Lambda Project	400000	410000	6000	93	Pass	2023-10-16
036	Mu Project	800000	790000	11000	91	Pass	2023-11-08
037	Nu Project	1100000	1090000	16000	94	Pass	2023-10-24
038	Xi Project	1800000	1850000	25000	86	Fail	2023-11-04
039	Omicron Project	3500000	3600000	45000	84	Fail	2023-11-06
040	Pi Project	550000	560000	7500	92	Pass	2023-10-19
041	Rho Project	700000	690000	10000	90	Pass	2023-11-11
042	Sigma Project	950000	940000	13000	93	Pass	2023-10-21
043	Tau Project	1300000	1280000	19000	95	Pass	2023-11-02
044	Upsilon Project	1700000	1750000	26000	89	Fail	2023-11-07
045	Phi Project	2200000	2180000	32000	91	Pass	2023-10-17
046	Chi Project	2800000	2900000	38000	87	Fail	2023-11-09
047	Psi Project	3200000	3300000	42000	85	Fail	2023-11-13
048	Omega Project	3800000	3900000	48000	83	Fail	2023-11-14
049	Alpha Project	1000000	980000	15000	95	Pass	2023-10-25
050	Beta Project	2500000	2600000	30000	88	Fail	2023-11-01
051	Gamma Project	500000	510000	8000	92	Pass	2023-10-15
052	Delta Project	750000	730000	12000	90	Pass	2023-11-10
053	Epsilon Project	1200000	1180000	18000	93	Pass	2023-10-20
054	Zeta Project	3000000	3100000	40000	85	Fail	2023-11-05
055	Eta Project	600000	620000	9000	91	Pass	2023-10-18
056	Theta Project	900000	890000	14000	94	Pass	2023-11-12
057	Iota Project	1500000	1480000	22000	96	Pass	2023-10-22
058	Kappa Project	2000000	2100000	28000	87	Fail	2023-11-03
059	Lambda Project	400000	410000	6000	93	Pass	2023-10-16
060	Mu Project	800000	790000	11000	91	Pass	2023-11-08
061	Nu Project	1100000	1090000	16000	94	Pass	2023-10-24
062	Xi Project	1800000	1850000	25000	86	Fail	2023-11-04
063	Omicron Project	3500000	3600000	45000	84	Fail	2023-11-06
064	Pi Project	550000	560000	7500	92	Pass	2023-10-19
065	Rho Project	700000	690000	10000	90	Pass	2023-11-11
066	Sigma Project	950000	940000	13000	93	Pass	2023-10-21
067	Tau Project	1300000	1280000	19000	95	Pass	2023-11-02
068	Upsilon Project	1700000	1750000	26000	89	Fail	2023-11-07
069	Phi Project	2200000	2180000	32000	91	Pass	2023-10-17
070	Chi Project	2800000	2900000	38000	87	Fail	2023-11-09
071	Psi Project	3200000	3300000	42000	85	Fail	2023-11-13
072	Omega Project	3800000	3900000	48000	83	Fail	2023-11-14
073	Alpha Project	1000000	980000	15000	95	Pass	2023-10-25
074	Beta Project	2500000	2600000	30000	88	Fail	2023-11-01
075	Gamma Project	500000	510000	8000	92	Pass	2023-10-15
076	Delta Project	750000	730000	12000	90	Pass	2023-11-10
077	Epsilon Project	1200000	1180000	18000	93	Pass	2023-10-20
078	Zeta Project	3000000	3100000	40000	85	Fail	2023-11-05
079	Eta Project	600000	620000	9000	91	Pass	2023-10-18
080	Theta Project	900000	890000	14000	94	Pass	2023-11-12
081	Iota Project	1500000	1480000	22000	96	Pass	2023-10-22
082	Kappa Project	2000000	2100000	28000	87	Fail	2023-11-03
083	Lambda Project	400000	410000	6000	93	Pass	2023-10-16
084	Mu Project	800000	790000	11000	91	Pass	2023-11-08
085	Nu Project	1100000	1090000	16000	94	Pass	2023-10-24
086	Xi Project	1800000	1850000	25000	86	Fail	2023-11-04
087	Omicron Project	3500000	3600000	45000	84	Fail	2023-11-06
088	Pi Project	550000	560000	7500	92	Pass	2023-10-19
089	Rho Project	700000	690000	10000	90	Pass	2023-11-11
090	Sigma Project	950000	940000	13000	93	Pass	2023-10-21
091	Tau Project	1300000	1280000	19000	95	Pass	2023-11-02
092	Upsilon Project	1700000	1750000	26000	89	Fail	2023-11-07
093	Phi Project	2200000	2180000	32000	91	Pass	2023-10-17
094	Chi Project	2800000	2900000	38000	87	Fail	2023-11-09
095	Psi Project	3200000	3300000	42000	85	Fail	2023-11-13
096	Omega Project	3800000	3900000	48000	83	Fail	2023-11-14
097	Alpha Project	1000000	980000	15000	95	Pass	2023-10-25
098	Beta Project	2500000	2600000	30000	88	Fail	2023-11-01
099	Gamma Project	500000	510000	8000	92	Pass	2023-10-15
100	Delta Project	750000	730000	12000	90	Pass	2023-11-10

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	524	525	526	527	528	529	530	531	532	533	534	535	536	537	538	539	540	541	542	543	544	545	546	547	548	549	550	551	552	553	554	555	556	557	558	559	560	561	562	563	564	565	566	567	568	569	570	571	572	573	574	575	576	577	578	579	580	581	582	583	584	585	586	587	588	589	590	591	592	593	594	595	596	597	598	599	600	601	602	603	604	605	606	607	608	609	610	611	612	613	614	615	616	617	618	619	620	621	622	623	624	625	626	627	628	629	630	631	632	633	634	635	636	637	638	639	640	641	642	643	644	645	646	647	648	649	650	651	652	653	654	655	656	657	658	659	660	661	662	663	664	665	666	667	668	669	670	671	672	673	674	675	676	677	678	679	680	681	682	683	684	685	686	687	688	689	690	691	692	693	694	695	696	697	698	699	700	701	702	703	704	705	706	707	708	709	710	711	712	713	714	715	716	717	718	719	720	721	722	723	724	725	726	727	728	729	730	731	732	733	734	735	736	737	738	739	740	741	742	743	744	745	746	747	748	749	750	751	752	753	754	755	756	757	758	759	760	761	762	763	764	765	766	767	768	769	770	771	772	773	774	775	776	777	778	779	780	781	782	783	784	785	786	787	788	789	790	791	792	793	794	795	796	797	798	799	800	801	802	803	804	805	806	807	808	809	810	811	812	813	814	815	816	817	818	819	820	821	822	823	824	825	826	827	828	829	830	831	832	833	834	835	836	837	838	839	840	841	842	843	844	845	846	847	848	849	850	851	852	853	854	855	856	857	858	859	860	861	862	863	864	865	866	867	868	869	870	871	872	873	874	875	876	877	878	879	880	881	882	883	884	885	886	887	888	889	890	891	892	893	894	895	896	897	898	899	900	901	902	903	904	905	906	907	908	909	910	911	912	913	914	915	916	917	918	919	920	921	922	923	924	925	926	927	928	929	930	931	932	933	934	935	936	937	938	939	940	941	942	943	944	945	946	947	948	949	950	951	952	953	954	955	956	957	958	959	960	961	962	963	964	965	966	967	968	969	970	971	972	973	974	975	976	977	978	979	980	981	982	983	984	985	986	987	988	989	990	991	992	993	994	995	996	997	998	999	1000
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Project Overview		Financial Summary		Operational Data		Compliance & Audit	
Project ID	Project Name	Budget (USD)	Actual Cost (USD)	Units Produced	Quality Score	Compliance Status	Audit Findings
001	Alpha Project	100000	98000	1200	95	Compliant	None
002	Beta Project	250000	260000	3500	88	Minor Issues	Documentation Gap
003	Gamma Project	500000	490000	7000	92	Compliant	None
004	Delta Project	750000	760000	10500	85	Major Issues	Process Deviation
005	Epsilon Project	1200000	1180000	15000	90	Compliant	None
006	Zeta Project	1800000	1850000	22000	82	Major Issues	Resource Allocation
007	Eta Project	2200000	2150000	28000	87	Minor Issues	Timeline Delay
008	Theta Project	3000000	3100000	35000	78	Major Issues	Scope Creep
009	Iota Project	3500000	3400000	40000	91	Compliant	None
010	Kappa Project	4000000	4100000	45000	84	Minor Issues	Communication Breakdown
011	Lambda Project	4500000	4400000	50000	89	Compliant	None
012	Mu Project	5000000	5100000	55000	80	Major Issues	Quality Control Failure
013	Nu Project	5500000	5400000	60000	93	Compliant	None
014	Xi Project	6000000	6100000	65000	86	Minor Issues	Resource Shortage
015	Omicron Project	6500000	6400000	70000	90	Compliant	None
016	Pi Project	7000000	7100000	75000	83	Major Issues	Process Inefficiency
017	Rho Project	7500000	7400000	80000	92	Compliant	None
018	Sigma Project	8000000	8100000	85000	87	Minor Issues	Documentation Update
019	Tau Project	8500000	8400000	90000	91	Compliant	None
020	Upsilon Project	9000000	9100000	95000	84	Major Issues	Resource Reallocation
021	Phi Project	9500000	9400000	100000	89	Compliant	None
022	Chi Project	10000000	10100000	105000	80	Major Issues	Quality Assurance Gap
023	Psi Project	10500000	10400000	110000	93	Compliant	None
024	Omega Project	11000000	11100000	115000	86	Minor Issues	Communication Improvement
025	Alpha Project	11500000	11400000	120000	90	Compliant	None
026	Beta Project	12000000	12100000	125000	83	Major Issues	Resource Management
027	Gamma Project	12500000	12400000	130000	92	Compliant	None
028	Delta Project	13000000	13100000	135000	87	Minor Issues	Documentation Review
029	Epsilon Project	13500000	13400000	140000	91	Compliant	None
030	Zeta Project	14000000	14100000	145000	84	Major Issues	Process Optimization
031	Eta Project	14500000	14400000	150000	89	Compliant	None
032	Theta Project	15000000	15100000	155000	80	Major Issues	Quality Control Enhancement
033	Iota Project	15500000	15400000	160000	93	Compliant	None
034	Kappa Project	16000000	16100000	165000	86	Minor Issues	Resource Allocation Review
035	Lambda Project	16500000	16400000	170000	90	Compliant	None
036	Mu Project	17000000	17100000	175000	83	Major Issues	Communication Protocol Update
037	Nu Project	17500000	17400000	180000	92	Compliant	None
038	Xi Project	18000000	18100000	185000	87	Minor Issues	Documentation Standardization
039	Omicron Project	18500000	18400000	190000	91	Compliant	None
040	Pi Project	19000000	19100000	195000	84	Major Issues	Process Automation
041	Rho Project	19500000	19400000	200000	92	Compliant	None
042	Sigma Project	20000000	20100000	205000	87	Minor Issues	Resource Training
043	Tau Project	20500000	20400000	210000	90	Compliant	None
044	Upsilon Project	21000000	21100000	215000	83	Major Issues	Quality Assurance Protocol
045	Phi Project	21500000	21400000	220000	93	Compliant	None
046	Chi Project	22000000	22100000	225000	86	Minor Issues	Communication Channel Expansion
047	Psi Project	22500000	22400000	230000	90	Compliant	None
048	Omega Project	23000000	23100000	235000	84	Major Issues	Resource Management Review
049	Alpha Project	23500000	23400000	240000	89	Compliant	None
050	Beta Project	24000000	24100000	245000	80	Major Issues	Quality Control System Upgrade
051	Gamma Project	24500000	24400000	250000	93	Compliant	None
052	Delta Project	25000000	25100000	25			

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Cover Page

HIOS Issuer ID: 33871

HIOS Product ID: 33871PA010, 33871PA011

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

Unique Plan Design Supporting Documentation and Justification

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 33871

HIOS Product IDs: 33871PA010, 33871PA011

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

Purpose of document:

The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning 1/1/2021. 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 outpatient facility fee 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 the outpatient facility site of service cost-sharing.

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.

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:

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

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

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

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

Not applicable

Certification Language:

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

The analysis was

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

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

Actuary signature: _____

Actuary Printed Name: _____

Date: _____ 5/19/2020

Unique Plan Design Supporting Documentation and Justification

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 33871

HIOS Product IDs: 33871PA010, 33871PA011

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

Purpose of document:

The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning 1/1/2021. 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 of inpatient hospital services for these plans is a combination of copays for facility claims and coinsurance for professional claims. Inpatient hospital services account for about 21% of allowed costs in the AV calculation.

Plans 33871PA0100044, 33871PA0100045 and 33871PA0100052 have three in-network tiers. 33871PA0100044 has expected third tier utilizations of 39%. 33871PA0100045 and 33871PA0100052 have expected third tier utilizations of 41%.

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

Method 156.135(b)(2) was used for inpatient hospital cost-sharing.
Method 156.135(b)(3) was used to accommodate the three-tier design.

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

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

Description of the standardized plan population data used:

For the freestanding and hospital utilization data for outpatient facility, we used our commercial PPO and HMO 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:***Combination of Copays and Coinsurance for IP Hospital***

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

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

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

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

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

HIOS IDs	33871PA0100026, 33871PA0110020	33871PA0100044 Tier 2	33871PA0100044 Tier 3	33871PA0100045 33871PA0100052 Tier 2	33871PA0100045 33871PA0100052 Tier 3
IP Cost Sharing					
Facility	\$700	\$700	\$1,100	\$900	\$1,300
Professional	50%	20%	30%	5%	10%

AVC Continuance Table	Bronze	Gold	Gold	Silver	Silver
PMPY for IP	\$1,144	\$1,516	\$1,516	\$1,236	\$1,236
Admit PMPY	0.05	0.06	0.06	0.06	0.06
Claim per Admit	\$23,982	\$23,897	\$23,897	\$22,251	\$22,251
Average LOS (days)	4.7	4.6	4.6	4.7	4.7
Effective Copay Factor for 5 days	0.50	0.46	0.46	0.49	0.49

Assumption from Data					
% Facility Cost	84%	84%	84%	84%	84%
% Professional Cost	16%	16%	16%	16%	16%

Calculations					
Professional Claim per Admit	\$3,837	\$3,823	\$3,823	\$3,560	\$3,560
Professional Claim per Day	\$823	\$824	\$824	\$750	\$750
Equiv. Copay per Day no max	\$412	\$165	\$247	\$38	\$75
Equiv. Copay per Day, 5-day max	\$828	\$356	\$534	\$77	\$154
Total Copay per Day, 5-day max	\$1,528	\$1,056	\$1,634	\$977	\$1,454

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

Using the AV calculator and the methods described above, we calculated the AV for each tier in each plan, as follows. Based on actual tier utilization experience incurred in 2015, we projected expected utilization by tier for the plans. The final AV for the plan was then calculated by taking the weighted average of the tier AVs using the utilization by tier. The following exhibits details this calculation.

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

	Actuarial Value			
HIOS ID	Tier 1	Tier 2	Tier 3	Average
33871PA0100044	79.95%	77.65%	76.50%	78.31%
33871PA0100045	73.46%	70.33%	69.66%	71.62%
33871PA0100052	72.15%	70.33%	69.66%	70.96%

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 Filing	2021 Filing	Change
Age Factor	1.500	1.503	1.002
Geographic Factor	1.000	1.000	1.000
Tobacco Factor	1.011	1.006	0.995
Total change			0.998

No changes were assumed for this filing.

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

The network factor used for Keystone HMO was 1.100.

The network factor used for Proactive was 1.000.

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

Table 10 factors:	HMO	1.045
	Proactive	0.950

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: Keystone Health Plan East

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 1.5%, with the range varying from -4.0% to 7.5%. The Part III Actuarial Memorandum indicates that the average rate change requested is -0.2%, with the range varying from -4.0% to 0.6%. The Pennsylvania Actuarial Memorandum indicates the average proposed rate change is -1.4%. Worksheet II of the URRT shows rate changes by plan varying from 0.0% to 11.5%. 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 -\$8.22 PMPM. The independent estimates calculated by the PID suggest that the experience period risk adjustment amount is -\$26.71 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 6.2% 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 KHPE 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 "KHPE Small Group Response to June 16 Obj" excel worksheet.

6. Please reconcile the change in the average age factor included in the file [ACA KHPE 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 "KHPE Small Group Response to June 16 Obj" excel worksheet.

- 7. Please provide a numerical development of the 1.003 change in network factor included in Table 5 of the rate filing exhibits.**

The calculation is shown on Tab Q7 of the "KHPE Small Group Response to June 16 Obj" excel worksheet.

- 8. 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.

- 9. 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.](#)

- 10. 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 Q10 of the "KHPE Small Group Response to June 16 Obj" excel worksheet.

- 11. 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.

- 12. 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.

- 13. 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 Q13 of the “KHPE Small Group Response June 16 Obj” excel worksheet.

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

We have made this revision.

- 15. 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.

- 16. 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.

- 17. 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.](#)

- 18. Per the Department’s published guidance, the Benefit Richness factors in Table 10 Column L should be developed based upon the following formula: $(\text{Plan Pricing AV in column K} * \text{CSR Defunding Adjustment in column P})^2 - (\text{Plan Pricing AV in column K} * \text{CSR Defunding Adjustment in column P}) + 1.24$. 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.**

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Response Date June 23, 2020

The calculation of the MLR is shown on Tab Q18 of the “KHPE 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.

19. 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.

20. 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.

For the most part we have held our rate increases constant by plan design across the single risk pool except for differences in changes in cost sharing between plan design and the changes to the induced demand factors that were required by the state. The largest driver of different rate increase by plan design for our plans in 2021 is the required change in induced demand factors that were required by the state. In this way the morbidity impact by plan was removed from the rate increases because if the plans had the same benefit changes, they would have received the same rate increase regardless of what their plan specific experience was.

21. 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.

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

22. 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.](#)

23. 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 additional information in a subsequent response.](#)

- 24. 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.

- 25. 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.](#)

- 26. 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.](#)

- 27. 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.](#)

1. **The cover letter and rate change request summary indicate that the average rate change requested is 1.5%, with the range varying from -4.0% to 7.5%. The Part III Actuarial Memorandum indicates that the average rate change requested is -0.2%, with the range varying from -4.0% to 0.6%. The Pennsylvania Actuarial Memorandum indicates the average proposed rate change is -1.4%. Worksheet II of the URRT shows rate changes by plan varying from 0.0% to 11.5%. 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 -\$8.22 PMPM. The independent estimates calculated by the PID suggest that the experience period risk adjustment amount is -\$26.71 PMPM. Please reconcile this difference.**

The -\$8.22 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 “KHPE 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.

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Response Date June 30, 2020

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

- 6. Please reconcile the change in the average age factor included in the file [ACA KHPE 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 “KHPE Small Group Response to June 16 Obj” excel worksheet.

- 7. Please provide a numerical development of the 1.003 change in network factor included in Table 5 of the rate filing exhibits.**

The calculation is shown on Tab Q7 of the “KHPE Small Group Response to June 16 Obj” excel worksheet.

- 8. 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.

- 9. 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% $[1.065^{(0.25)}] = 1.016$.

10. 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 Q10 of the “KHPE Small Group Response to June 16 Obj” excel worksheet.

11. 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.

12. 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.

13. 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 Q13 of the “KHPE Small Group Response June 16 Obj” excel worksheet.

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

We have made this revision.

15. 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.

16. 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 the \$50 PCP copay is less than 50% coinsurance.

17. 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.

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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.

- 18. 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 Q18 of the “KHPE 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.

- 19. 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.

- 20. 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.**

For the most part we have held our rate increases constant by plan design across the single risk pool except for differences in changes in cost sharing between plan design and the changes to the induced demand factors that were required by the state. The largest driver of different rate increase by plan design for our plans in 2021 is the required change in induced demand factors that were required by the state. In this way the morbidity impact by plan was removed from the rate increases because if the plans had the same benefit changes, they would have received the same rate increase regardless of what their plan specific experience was.

- 21. 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.

- 22. 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.

- 23. 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.

- 24. 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 x 1.**

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

- 25. 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 being 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 Q14.

- 26. 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 Q26 of the “KHPE Small Group Response June 16 Obj” excel worksheet.

27. 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.

KHPE Small Group

Metal	BMMO	PLRS	ARF	GCF	IDF	AV	Product w Risk	Product w/o Risk	
Plat	195,576	1.731	1.495		1.002	1.150	0.900	1.996	1.551
Gold	562,020	1.327	1.486		1.002	1.080	0.800	1.436	1.287
Silver	533,808	1.034	1.520		1.002	1.030	0.700	1.067	1.099
Bronze	31,632	0.746	1.556		1.002	1.000	0.600	0.748	0.936
Total	1,323,036	1.254	1.503		1.002	1.068	0.770	1.354	1.242
Check to AM	TRUE		TRUE						
Est. StateWide Average		1.390	\$ 443.93	1.504	1.00	1.079	0.787	1.499	1.277

(26.56)

Entity	Segment	2017	2018	2019	2020
CommI KHPE - SG 2-50					
	Inpatient	3.2%	2.4%	3.1%	4.5%
	Outpatient	2.0%	1.9%	2.8%	3.5%
	Professional	0.7%	1.1%	1.2%	1.7%
	Capitation	1.2%	0.8%	1.8%	1.9%
	Total	1.8%	1.6%	2.2%	3.0%

Age	Age Factor	Feb-19 Members	2019 Members	Feb-20 Members	Tobacco Factor	Projected Use
0-14	0.765	14,876	14,943	14,399	0	0
15	0.833	1,179	1,204	1,177	0	0
16	0.859	1,259	1,231	1,176	0	0
17	0.885	1,242	1,243	1,243	0	0
18	0.913	1,332	1,297	1,220	0	0
19	0.941	1,312	1,300	1,290	0	0
20	0.970	1,393	1,367	1,324	0	0
21	1.000	1,394	1,411	1,431	0.125	0.018
22	1.000	1,465	1,424	1,439	0.125	0.018
23	1.000	1,513	1,539	1,455	0.125	0.018
24	1.000	1,562	1,541	1,524	0.125	0.018
25	1.004	1,639	1,675	1,700	0.125	0.018
26	1.024	2,002	2,090	1,997	0.125	0.018
27	1.048	2,226	2,287	2,304	0.125	0.018
28	1.087	2,309	2,264	2,377	0.125	0.018
29	1.119	2,243	2,277	2,422	0.125	0.018
30	1.135	2,163	2,212	2,288	0.175	0.018
31	1.159	2,303	2,224	2,296	0.175	0.018
32	1.183	2,169	2,183	2,298	0.175	0.018
33	1.198	2,102	2,092	2,195	0.175	0.018
34	1.214	1,978	2,001	2,134	0.175	0.018
35	1.222	2,033	2,008	2,053	0.175	0.018
36	1.230	1,991	2,017	2,011	0.175	0.018
37	1.238	2,006	2,006	2,019	0.175	0.018
38	1.246	1,969	1,958	2,059	0.175	0.018
39	1.262	1,889	1,943	2,054	0.175	0.018
40	1.278	1,811	1,807	1,955	0.225	0.037
41	1.302	1,764	1,760	1,835	0.225	0.037
42	1.325	1,762	1,704	1,803	0.225	0.037
43	1.357	1,656	1,678	1,730	0.225	0.037
44	1.397	1,698	1,679	1,688	0.225	0.037
45	1.444	1,703	1,694	1,735	0.225	0.037
46	1.500	1,633	1,662	1,706	0.225	0.037
47	1.563	1,825	1,775	1,688	0.225	0.037
48	1.635	2,105	2,042	1,825	0.225	0.037
49	1.706	1,949	1,973	2,118	0.225	0.037
50	1.786	2,050	2,006	1,951	0.375	0.037
51	1.865	1,939	1,974	2,059	0.375	0.037
52	1.952	2,080	2,082	1,959	0.375	0.037
53	2.040	2,187	2,162	2,055	0.375	0.037
54	2.135	2,247	2,240	2,193	0.375	0.037
55	2.230	2,308	2,284	2,227	0.375	0.037
56	2.333	2,202	2,215	2,277	0.375	0.037
57	2.437	2,213	2,159	2,140	0.375	0.037
58	2.548	2,109	2,150	2,192	0.375	0.037
59	2.603	2,156	2,077	2,099	0.375	0.037
60	2.714	2,026	2,040	2,140	0.375	0.037
61	2.810	2,088	2,058	2,032	0.375	0.037
62	2.873	1,837	1,874	2,045	0.375	0.037
63	2.952	1,785	1,704	1,767	0.375	0.037
64+	3.000	3,049	2,605	3,146	0.375	0.037
Avg Age		1.500	1.491	1.503		
Tobacco Factor				1.006		

						Pricing AV (co			Benefit Richnes Benefits in addit		2021 Network	2020 Network	Catastroph Non-Funding of CSR Adjustment		
33871PA0100020	HMO	Keystone H E	Platinum	0.9194	Standard A Off	0.962	1.115	1.010	1.045	1.042	1.000	1.000	1,627		
33871PA0100021	HMO	Keystone H E	Platinum	0.898689	Standard A Off	0.941	1.097	1.010	1.045	1.042	1.000	1.000	5,787		
33871PA0100022	HMO	Keystone H E	Gold	0.8164	Standard A Off	0.816	1.009	1.010	1.045	1.042	1.000	1.000	20,393		
33871PA0100023	HMO	Keystone H E	Gold	0.818	Approach : Off	0.825	1.014	1.010	1.045	1.042	1.000	1.000	972		
33871PA0100024	HMO	Keystone H E	Silver	0.719293	Approach : Off	0.716	0.960	1.010	1.045	1.042	1.000	1.000	1,624		
33871PA0100025	HMO	Keystone H E	Silver	0.719239	Standard A Off	0.713	0.959	1.010	1.045	1.042	1.000	1.000	1,596		
33871PA0100026	HMO	Keystone H E	Bronze	0.6482	Approach : Off	0.557	0.920	1.010	1.045	1.042	1.000	1.000	2,201		
33871PA0110011	POS	Keystone C E	Platinum	0.9194	Standard A Off	0.986	1.136	1.010	1.045	1.042	1.000	1.000	2,530		
33871PA0110012	POS	Keystone C E	Platinum	0.898689	Standard A Off	0.966	1.118	1.010	1.045	1.042	1.000	1.000	5,678		
33871PA0110013	POS	Keystone C E	Gold	0.8164	Standard A Off	0.839	1.024	1.010	1.045	1.042	1.000	1.000	8,251		
33871PA0110014	POS	Keystone C E	Gold	0.818	Approach : Off	0.847	1.028	1.010	1.045	1.042	1.000	1.000	1,587		
33871PA0110019	POS	Keystone C E	Silver	0.719239	Standard A Off	0.736	0.969	1.010	1.045	1.042	1.000	1.000	1,816		
33871PA0110020	POS	Keystone C E	Bronze	0.6482	Approach : Off	0.578	0.923	1.010	1.045	1.042	1.000	1.000	435		
33871PA0100044	HMO	Keystone H E	Gold	0.7831	Approach : Off	0.835	1.021	1.010	0.950	0.947	1.000	1.000	15,043		
33871PA0100045	HMO	Keystone H E	Silver	0.7162	Approach : Off	0.672	0.944	1.010	0.950	0.947	1.000	1.000	36,742		
33871PA0100047	HMO	Keystone H E	Gold	0.8196	Approach : Off	0.841	1.025	1.010	1.045	1.042	1.000	1.000	543		
33871PA0100048	HMO	Keystone H E	Silver	0.7111	Approach : Off	0.707	0.957	1.010	1.045	1.042	1.000	1.000	1,203		
33871PA0100049	HMO	Keystone H E	Silver	0.7141	Standard A Off	0.677	0.946	1.010	1.045	1.042	1.000	1.000	845		
33871PA0100050	HMO	Keystone H E	Platinum	0.871145	Standard A Off	0.913	1.075	1.010	1.045	1.042	1.000	1.000	676		
33871PA0100051	HMO	Keystone H E	Gold	0.7935	Standard A Off	0.800	1.000	1.010	1.045	1.042	1.000	1.000	46		
33871PA0100052	HMO	Keystone H E	Silver	0.7096	Approach : Off	0.650	0.938	1.010	0.950	0.947	1.000	1.000	658		
						0.780	1.000	1.010	1.000	0.997	1.000	1.000	110,253		

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

	KHPE Small Group
Projected Claims PMPM (After Reinsurance)	\$ 451.15
Premium PMPM	\$ 551.66
Quality Improvement Expense PMPM	\$ 4.41
Exchange User Fee PMPM	\$ -
HIF PMPM	\$ -
Federal Income Tax PMPM	\$ 2.32
Premium Tax PMPM	\$ -
Federal MLR	82.9%

HIOS ID					February 2020 Renewal Membership				Average Rate Change
	Q1 Rate Change	Q2 Rate Change	Q3 Rate Change	Q4 Rate Change	1/1/2021	4/1/2021	7/1/2021	10/1/2021	
33871PA0100020	0.33%	4.76%	6.00%	7.24%	780	219	335	293	3.34%
33871PA0100021	0.51%	4.95%	6.18%	7.43%	1,873	1,170	1,387	1,357	4.39%
33871PA0100022	0.33%	4.76%	5.99%	7.24%	7,865	4,077	3,271	5,180	3.88%
33871PA0100023	0.24%	4.67%	5.90%	7.14%	270	215	210	277	4.41%
33871PA0100024	-0.12%	4.29%	5.52%	6.76%	456	340	356	472	4.04%
33871PA0100025	-1.11%	3.25%	4.47%	5.70%	553	398	197	448	2.58%
33871PA0100026	-3.97%	0.28%	1.46%	2.66%	915	498	356	432	-0.83%
33871PA0110011	0.32%	4.76%	5.99%	7.24%	1,111	483	517	419	3.47%
33871PA0110012	0.51%	4.95%	6.19%	7.43%	2,088	1,256	946	1,388	4.13%
33871PA0110013	0.32%	4.76%	5.99%	7.24%	2,705	1,768	1,652	2,126	4.19%
33871PA0110014	0.23%	4.66%	5.90%	7.14%	422	535	324	306	4.21%
33871PA0110019	-1.11%	3.26%	4.47%	5.70%	629	596	290	301	2.34%
33871PA0110020	-4.03%	0.21%	1.39%	2.58%	137	82	76	140	-0.15%
33871PA0100044	0.51%	4.95%	6.18%	7.43%	5,086	3,088	2,576	4,293	4.37%
33871PA0100045	-0.84%	3.54%	4.76%	5.99%	12,759	7,019	5,877	11,087	2.95%
33871PA0100047	-0.40%	4.00%	5.23%	6.46%	154	84	115	190	3.88%
33871PA0100048	0.16%	4.58%	5.81%	7.06%	425	276	223	279	3.82%
33871PA0100049	0.16%	4.59%	5.82%	7.06%	320	141	130	254	3.85%
33871PA0100050	0.60%	5.04%	6.28%	7.53%	361	177	36	102	3.11%
33871PA0100051	0.33%	4.76%	5.99%	7.24%	46	0	0	0	0.33%
33871PA0100052	-0.84%	3.54%	4.76%	6.00%	658	0	0	0	-0.84%
Total	-0.20%	4.23%	5.50%	6.67%	39,613	22,422	18,874	29,344	3.50%

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
33871PA0100020	1,627	0.962	1.000	1.203	1.115	1.115	0.000
33871PA0100021	5,787	0.941	1.000	1.185	1.097	1.097	0.000
33871PA0100022	20,393	0.816	1.000	1.090	1.009	1.009	0.000
33871PA0100023	972	0.825	1.000	1.095	1.014	1.014	0.000
33871PA0100024	1,624	0.716	1.000	1.037	0.960	0.960	0.000
33871PA0100025	1,596	0.713	1.000	1.035	0.959	0.959	0.000
33871PA0100026	2,201	0.557	1.000	0.993	0.920	0.920	0.000
33871PA0110011	2,530	0.986	1.000	1.227	1.136	1.136	0.000
33871PA0110012	5,678	0.966	1.000	1.207	1.118	1.118	0.000
33871PA0110013	8,251	0.839	1.000	1.105	1.024	1.024	0.000
33871PA0110014	1,587	0.847	1.000	1.110	1.028	1.028	0.000
33871PA0110019	1,816	0.736	1.000	1.046	0.969	0.969	0.000
33871PA0110020	435	0.578	1.000	0.996	0.923	0.923	0.000
33871PA0100044	15,043	0.835	1.000	1.102	1.021	1.021	0.000
33871PA0100045	36,742	0.672	1.000	1.020	0.944	0.944	0.000
33871PA0100047	543	0.841	1.000	1.106	1.025	1.025	0.000
33871PA0100048	1,203	0.707	1.000	1.033	0.957	0.957	0.000
33871PA0100049	845	0.677	1.000	1.021	0.946	0.946	0.000
33871PA0100050	676	0.913	1.000	1.161	1.075	1.075	0.000
33871PA0100051	46	0.800	1.000	1.080	1.000	1.000	0.000
33871PA0100052	658	0.650	1.000	1.012	0.938	0.938	0.000
Total	110,253	0.780	1.000	1.080	1.000	1.000	

				2020 Pricing AV	2021 Pricing AV
33871PA0100020	HMO	Keystone HMO Platinum Preferred \$10/\$20/\$150	E	0.963	0.962
33871PA0100021	HMO	Keystone HMO Platinum Preferred \$20/\$40/\$200	E	0.959	0.941
33871PA0100022	HMO	Keystone HMO Gold Preferred \$35/\$70/\$650	E	0.843	0.816
33871PA0100023	HMO	Keystone HMO Gold Classic \$1,500/\$25/\$50/90%	E	0.819	0.825
33871PA0100024	HMO	Keystone HMO Silver Classic \$4,250/\$25/\$50/70%	E	0.742	0.716
33871PA0100025	HMO	Keystone HMO Silver Classic \$3,250/\$30/\$60/50%	E	0.746	0.713
33871PA0100026	HMO	Keystone HMO Bronze Essential \$6,850/\$50/\$100/\$70	E	0.681	0.557
33871PA0110011	POS	Keystone DPOS Platinum Preferred \$10/\$20/\$150	E	0.962	0.986
33871PA0110012	POS	Keystone DPOS Platinum Preferred \$20/\$40/\$200	E	0.958	0.966
33871PA0110013	POS	Keystone DPOS Gold Preferred \$35/\$70/\$650	E	0.842	0.839
33871PA0110014	POS	Keystone DPOS Gold Classic \$1,500/\$25/\$50/90%	E	0.819	0.847
33871PA0110019	POS	Keystone DPOS Silver Classic \$3,250/\$30/\$60/50%	E	0.746	0.736
33871PA0110020	POS	Keystone DPOS Bronze Essential \$6,850/\$50/\$100/\$70	E	0.680	0.578
33871PA0100044	HMO	Keystone HMO Gold Proactive	E	0.873	0.835
33871PA0100045	HMO	Keystone HMO Silver Proactive	E	0.765	0.672
33871PA0100047	HMO	Keystone HMO Gold Classic \$2,500/\$40/\$80/100%	E	0.854	0.841
33871PA0100048	HMO	Keystone HMO Silver Classic \$4,500/\$40/\$80/100%	E	0.721	0.707
33871PA0100049	HMO	Keystone HMO Silver Secure \$5,000/\$40/\$80/\$600	E	0.718	0.677
33871PA0100050	HMO	Keystone HMO Platinum Preferred \$30/\$60/\$400	E	0.947	0.913
33871PA0100051	HMO	Keystone HMO Gold Secure \$1,000/\$40/\$80/\$650	E	0.822	0.800
33871PA0100052	HMO	Keystone HMO Silver Proactive Value	E	0.717	0.650

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Response Date July 20, 2020

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

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

- 2. The ‘Q3’ tab of the file “KHPE 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 6.2%. 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 QCC 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., 3.5%). 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 6.2%. Removing the 8.9% from that result leaves a one year trend of 3.6%.

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

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

Additionally, please provide the following information:

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

Cover Letter for Responses to July 8 Objection Letter – KHPE Small Group INAC-132358831
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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 "KHPE 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 "KHPE 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 "KHPE 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 9b 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,

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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 Risk Adjustment User Fee included in the PA Rate template was updated based on the response to Question 14 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.

- 9. 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.

- 10. 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.**

- 11. Response #18 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 Q18. Hard coded numbers are entered in Column L; please revise.**

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.

- 12. 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.**

- 13. 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.

14. 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.

15. The data requested in Item 17 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.

16. The data requested in Item 27 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.

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:

- 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
- 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	14,876	14,943	14,399	0	0
15	0.833	1,179	1,204	1,177	0	0
16	0.859	1,259	1,231	1,176	0	0
17	0.885	1,242	1,243	1,243	0	0
18	0.913	1,332	1,297	1,220	0	0
19	0.941	1,312	1,300	1,290	0	0
20	0.970	1,393	1,367	1,324	0	0
21	1.000	1,394	1,411	1,431	0.125	0.018
22	1.000	1,465	1,424	1,439	0.125	0.018
23	1.000	1,513	1,539	1,455	0.125	0.018
24	1.000	1,562	1,541	1,524	0.125	0.018
25	1.004	1,639	1,675	1,700	0.125	0.018
26	1.024	2,002	2,090	1,997	0.125	0.018
27	1.048	2,226	2,287	2,304	0.125	0.018
28	1.087	2,309	2,264	2,377	0.125	0.018
29	1.119	2,243	2,277	2,422	0.125	0.018
30	1.135	2,163	2,212	2,288	0.175	0.018
31	1.159	2,303	2,224	2,296	0.175	0.018
32	1.183	2,169	2,183	2,298	0.175	0.018
33	1.198	2,102	2,092	2,195	0.175	0.018
34	1.214	1,978	2,001	2,134	0.175	0.018
35	1.222	2,033	2,008	2,053	0.175	0.018
36	1.230	1,991	2,017	2,011	0.175	0.018
37	1.238	2,006	2,006	2,019	0.175	0.018
38	1.246	1,969	1,958	2,059	0.175	0.018
39	1.262	1,889	1,943	2,054	0.175	0.018
40	1.278	1,811	1,807	1,955	0.225	0.037
41	1.302	1,764	1,760	1,835	0.225	0.037
42	1.325	1,762	1,704	1,803	0.225	0.037
43	1.357	1,656	1,678	1,730	0.225	0.037
44	1.397	1,698	1,679	1,688	0.225	0.037
45	1.444	1,703	1,694	1,735	0.225	0.037
46	1.500	1,633	1,662	1,706	0.225	0.037
47	1.563	1,825	1,775	1,688	0.225	0.037
48	1.635	2,105	2,042	1,825	0.225	0.037
49	1.706	1,949	1,973	2,118	0.225	0.037
50	1.786	2,050	2,006	1,951	0.375	0.037
51	1.865	1,939	1,974	2,059	0.375	0.037
52	1.952	2,080	2,082	1,959	0.375	0.037
53	2.040	2,187	2,162	2,055	0.375	0.037
54	2.135	2,247	2,240	2,193	0.375	0.037
55	2.230	2,308	2,284	2,227	0.375	0.037
56	2.333	2,202	2,215	2,277	0.375	0.037
57	2.437	2,213	2,159	2,140	0.375	0.037
58	2.548	2,109	2,150	2,192	0.375	0.037
59	2.603	2,156	2,077	2,099	0.375	0.037
60	2.714	2,026	2,040	2,140	0.375	0.037
61	2.810	2,088	2,058	2,032	0.375	0.037
62	2.873	1,837	1,874	2,045	0.375	0.037
63	2.952	1,785	1,704	1,767	0.375	0.037
64+	3.000	3,049	2,605	3,146	0.375	0.037
Avg Age		1.500	1.491	1.503		
Tobacco Factor				1.006		

Entity	Segment	2017	2018	2019	2020
CommI KHPE - SG 2-50					
	Inpatient	3.2%	2.4%	3.1%	4.5%
	Outpatient	2.0%	1.9%	2.8%	3.5%
	Professional	0.7%	1.1%	1.2%	1.7%
	Capitation	1.2%	0.8%	1.8%	1.9%
	Total Medical	1.8%	1.6%	2.2%	3.0%
	Drug Ingredient Cost	3.5%	4.9%	3.3%	5.8%

HIOS ID	2021 Pricing AV	2021 CSR Factor	Combined	2019 Paid to Allowed
33871PA0100020	0.962	1.000	0.962	0.930
33871PA0100021	0.941	1.000	0.941	0.925
33871PA0100022	0.816	1.000	0.816	0.887
33871PA0100023	0.825	1.000	0.825	0.851
33871PA0100024	0.716	1.000	0.716	0.786
33871PA0100025	0.713	1.000	0.713	0.818
33871PA0100026	0.557	1.000	0.557	0.771
33871PA0110011	0.986	1.000	0.986	0.924
33871PA0110012	0.966	1.000	0.966	0.907
33871PA0110013	0.839	1.000	0.839	0.870
33871PA0110014	0.847	1.000	0.847	0.844
33871PA0110019	0.736	1.000	0.736	0.769
33871PA0110020	0.578	1.000	0.578	0.751
33871PA0100044	0.835	1.000	0.835	0.867
33871PA0100045	0.672	1.000	0.672	0.831
33871PA0100047	0.841	1.000	0.841	0.879
33871PA0100048	0.707	1.000	0.707	0.839
33871PA0100049	0.677	1.000	0.677	0.803
33871PA0100050	0.913	1.000	0.913	0.872
33871PA0100051	0.800	1.000	0.800	N/A
33871PA0100052	0.650	1.000	0.650	N/A

Completeness and Redaction Justification Checklist

Issuer Name: Keystone Health Plan East
 Market: Small Group HMO
 SERFF ID: INAC-132358832

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	9	N/A
	PA Act. Exhibits Table 2	X	N	15	N/A
D.1.G.	Credibility of Data	X	N	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	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	12-13	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	68	N/A
Redaction Justification (must be submitted if any information is redacted)		X			Y