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May 6, 2015

Ms. Rashmi Mathur
A&H Actuarial
Bureau of Accident & Health Insurance
Office of Insurance Product Regulation and Market Enforcement
1311 Strawberry Square
Harrisburg, PA 17120

Re: Aetna Health Insurance Company - PA Small Group Rate Manual – 01/01/2016

Dear Ms. Mathur:

The purpose of this filing revision is to provide details of the premium rate development and resulting proposed monthly premium rates for Small Group policies which will be offered off-Exchange in the State of PA for effective dates of January 1, 2016 and later. This filing is being provided to comply with regulatory rate filing requirements, and is not intended to be used for other purposes.

The health benefit plans proposed in this filing are new benefit plans and are in compliance with all state-specific benefit requirements and rating regulations, as well as the benefit plan requirements of the Patient Protection and Affordability Act (P.L. 111-148). Additionally, these health benefit plans conform to each respective tier of coverage, defined as Bronze, Silver, Gold, and Platinum. All plans within a tier are expected to achieve an actuarial value consistent with the thresholds established for each tier – 60%, 70%, 80%, and 90%, respectively – approximated within the allowable range of deviation defined as 2 percentage points.

This rate filing is intended for new business issued through the State of PA off-Exchange marketplace effective January 1, 2016.

All products and associated proposed monthly premium rates contained within this rate filing will be available to existing business upon their request. Existing business that is not considered grandfathered under PPACA regulation will be converted to the plans and rates in this filing upon renewal.

We have tried to present this information in a manner that will facilitate your Department's review. If there are changes we can make to improve the process or you would like us to present the information differently in the future, please let us know.



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Please feel free to contact me at the above listed telephone number and/or e-mail address if you have any additional questions.

Since AHI, AHIC, ALIC, and HASPA consider this submission to contain proprietary information, we ask that it be kept confidential to the extent possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Adams". The signature is fluid and cursive.

Andrew Adams, F.S.A., M.A.A.A.
Mgr, Actuarial
Aetna

Enclosures

Actuarial Memorandum and Certification

General Information

Company Identifying Information:

Company Legal Name: Aetna Health, Inc. (and Aetna Health Ins. Co.)
State: Pennsylvania
HIOS Issuer ID: 64844
Market: Small Group
Policy Form(s): HI AShortTermVisDenDeduct 03; HI RRXDRUGPLAN
V005; HO AShortTermVisDen 04; HO ARecCharge V003
Effective Date: 01/01/2016
Rate Filing Tracking Number: AETN-130046864 & AETN-130046890
Form Filing Tracking Number: AETN-130047878; AETN-130047985

Company Contact Information:

Name: [REDACTED]
Telephone Number: [REDACTED]
Email Address: [REDACTED]

1. Purpose, Scope, and Effective Date

The purpose of this filing is to:

- 1) Provide support for the development of the Part I Unified Rate Review Template;
- 2) Provide support for the assumptions and rate development applicable to the products supported by the policy forms referenced above;
- 3) Request approval of the resulting monthly premium rates for the products supported by the policy forms referenced above; and
- 4) Provide summaries of the benefit details for the products/plan designs referenced by this filing.

The development of the rates reflects the impact of the market forces and rating requirements associated with the Patient Protection and Affordable Care Act (PPACA) and subsequent regulation.

These rates are for plans issued in Pennsylvania beginning January 1, 2016. The rates comply with all rating guidelines under federal and state regulations. The filing covers plans that will be offered outside the public Marketplace in Pennsylvania.

2. Proposed Rate Increase

Monthly premium rates for all Small Group Market products in Pennsylvania are being revised for effective dates January 1, 2016 through December 31, 2016.

A. Reason for Rate Increase(s):

Revised rates for these products reflect the following:

- Impact of medical claim trend (including changes in provider unit costs and increased utilization of medical cost services);
- Revisions to our assumptions about population morbidity and the projected population distribution;
- Changes in cost sharing to ensure that plans comply with Actuarial Value requirements;
- Changes in our pricing models used to determine the impact of cost sharing designs; and

- Changes in provider networks and contracts.

B. Variation in Rate Changes by Plan/Product:

Rate changes differ by plan for the following reasons:

- Provider cost estimates have been updated, and the change differs based on network.
- Changes in cost sharing differ by plan in order to maintain compliance with Actuarial Value and other regulatory requirements.
- Our internal pricing models have been updated to reflect more current information on levels of induced demand associated with different benefit designs in the large group market. These changes impact our estimates of the relative costs of the plan designs that will be offered.
- Updates to family deductible and out of pocket maximum provisions on HSA-compatible plans to comply with new federal regulations.

The weighted average increase across plans based on current ACA-compliant membership, inclusive of the impact of benefit and cost sharing changes, is 6.1%. The minimum rate change is -9.7% and the maximum rate change is 21.5%.

3. History of Rate Adjustments

- January 1, 2014 Initial introduction of these products
- January 1, 2015 -12.3% avg rate change for HNOption plans; -5.4% avg rate change for HMO plans; -3.1% avg rate change for POS plans

4. Experience Period Premium and Claims

A. Paid Through Date:

The experience data reported in Worksheet 1, Section I of the Part I Unified Rate Review Template reflects incurred claims from January 1, 2014 through December 31, 2014 and paid through January 31, 2015.

B. Premiums (Net of MLR Rebate) in Experience Period:

C. Allowed and Incurred Claims Incurred During the Experience Period:

Allowed and incurred claims are sourced from our actuarial experience databases. These databases provide member-level detail on total allowed and incurred claims but do not include unit cost or utilization metrics. We allocate claims to cost categories and estimate the corresponding unit costs and utilization metrics by using an alternate reporting system that calculates unit cost and utilization metrics by medical cost category but only permits inclusion/exclusion of experience at the market and segment levels. A reconciliation of aggregate data in our actuarial experience databases is performed to ensure that data is consistent with the experience data contained in our enterprise-wide data warehouse.

Total incurred claims are developed by estimating the incurred but not paid (IBNP) reserves using aggregate block of business paid claims. Paid claims are adjusted using the IBNP completion factors. More specifically, historical claim payment patterns are used to predict the ultimate incurred claims for each date-of-service month. The IBNP is estimated using actuarial principles and assumptions which consider historical claim submission and adjudication patterns, unit cost and utilization trends, claim

inventory levels, changes in membership and product mix, seasonality, and other relevant factors including a review of large claims. This same process is used to develop IBNP estimates for allowed claims.

As noted above, the experience period reflects one month of paid claim run-off. [REDACTED]

Exhibit Z summarizes the experience data and documents the impact of the IBNP reserves, by date-of-service for each month within the experience period.

5. Benefit Categories

Our internal systems assign claims to several benefit categories. We have mapped these categories to the categories described in the Unified Rate Review Instructions dated February 21, 2015. Inpatient Hospital consists of care delivered at an inpatient facility and associated expenses, included day-based mental health services. Outpatient Hospital includes outpatient surgical and emergency care and associated expenses. Professional includes both specialty physician and primary care physician expenses, including visit-based mental health services. Other includes home health care, medical pharmacy expenses, laboratory expenses, and radiology expenses. Non-capitated ambulance is included in the Outpatient Hospital category when billed by the facility and included in Specialist Physician otherwise. Prescription Drug includes drugs dispensed by a pharmacy.

The utilization for these services are counted by service type, and aggregated for each benefit category. Inpatient Hospital utilization is counted as days; Outpatient Hospital, Professional, and Other Medical utilization are counted as visits. Prescription Drug utilization is counted per script.

6. Projection Factors

A. Changes in the Morbidity of the Population Insured:

[REDACTED]

B. Changes in Benefits:

The products included in this filing include benefits necessary to comply with the Essential Health Benefit requirements. The experience data includes experience for both Single Risk Pool products that have essentially identical benefits and coverage issued outside the Single Risk Pool which does not cover all EHBs. The projection factor reflects the pro-rated impact of these additional benefits.

The change in projected utilization due to changes in benefits is also considered. As cost sharing decreases (measured by increasing Actuarial Value), utilization increases. This pattern is reflected in the factors that are built into the federal risk adjustment mechanism that started in 2014. The federal risk adjustment program factors and other proprietary models were considered in the development of the utilization change. The average cost sharing in the experience period was compared with the average cost sharing in the projection period. From the average cost sharing change, an expected utilization change was derived.

C. Changes in Demographics:

Experience data was normalized for projected changes in the age/gender mix and area mix using internally-developed factors.

D. Other Adjustments:

[REDACTED]

E. Trend Factors (Cost/Utilization):

Anticipated annual trend from the experience period to the rating period for the product line is as follows:

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]

7. Credibility Manual Rate Development

A. Source and Appropriateness of Experience Data Used:

[REDACTED]

B. Adjustments Made to the Data:

[REDACTED]

C. Inclusion of Capitation Payments:

[REDACTED]

8. Credibility of Experience

[REDACTED]

9. Paid-to-Allowed Ratio

We project the following distribution of membership by metallic tier, resulting in a projected paid to allowed ratio of approximately [REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]

10. Reinsurance and Risk Adjustment

A. Reinsurance – Experience Period

[REDACTED]

B. Reinsurance – Projection Period

[REDACTED]

C. Risk Adjustment – Experience Period

[REDACTED]

D. Risk Adjustment – Projection Period

[REDACTED]

11. Non-Benefit Expenses and Profit & Risk

[REDACTED]

The Risk Adjustment Program User Fee and the Reinsurance Contribution have been reflected in the risk adjustment and reinsurance components of incurred claims. The Exchange User Fee is applied as an adjustment to the Index Rate at the market level.

These prospective expenses are based on historical expense levels, current-year projections, and projected changes in expenses, inflation, and membership. The profit target has increased from our 2015 target. This change is to bring the profit target in line with our long-term corporate objectives for this business.

12. Projected Loss Ratio

13. Single Risk Pool

The plans and rates included in the Part I URRT are those for all plans we intend to offer in the Small Group market in Pennsylvania through Aetna Health, Inc. (and AHIC). The proposed rates comply with the Single Risk Pool requirements of 45 CFR §156.80(d). Rates for plans that may be renewed outside the Single Risk Pool (due to either being grandfathered or permissible transitional offerings) are not covered in this filing.

14. Index Rate

The index rates for the experience and projection periods are set equal to the actual and projected allowed claims, respectively, less non-essential health benefits (non-EHBs).

The index rate reflects the projected mix of business by plan. The AV pricing values for each plan are set based on the actuarial value and cost-sharing design of the plan, the plan's provider network, delivery system characteristics, and utilization management practices, the impacts (as applicable) of benefits in addition to EHBs and catastrophic eligibility criteria, and the distribution and administrative costs applicable to the plan/product. Rates do not differ for any characteristic other than those allowable under the regulations as described in 45 CFR 156 §156.80(d)(2).

Small Group Market Trend Adjustments: The following table illustrates the quarterly trend factors, the resulting index rate for effective dates during each calendar quarter, the projected membership distribution by effective date, and the weighted-average index rate.

15. Market-Adjusted Index Rate

Exhibit E-1 illustrates the development of the Market Adjusted Index Rate. The three adjustments (Transitional Reinsurance, Risk Adjustment, and Exchange User Fees) were discussed previously. The reinsurance and risk adjustments on Worksheet 1 of the URRT are displayed on a paid-basis. The exchange user fee is estimated as a PMPM based on the target premium rate. The values reflected in Exhibit E-1 have each been divided by the paid to allowed ratio to convert them to an allowed-basis.

16. Plan-Adjusted Index Rates

Exhibit E-2 illustrates the development of the Plan Adjusted Index Rates, and displays each plan-specific adjustment made to the Market Adjusted Index Rate. The Plan Adjusted Index Rates are displayed in Column 7. The following briefly describes how each set of adjustments was determined.

A. Actuarial Value, Cost Sharing, and Tobacco:

[REDACTED]

B. Distribution and Administrative Costs:

Column 3 reflects the adjustment for projected administrative costs and profit. These are discussed above in the 'Non-Benefit Expenses and Profit & Risk' section, and exclude the Reinsurance Contribution, Risk Adjustment User Fee, and Exchange User Fee, which are reflected elsewhere. These expense and profit assumptions do not vary by plan.

C. Provider Network, Delivery System, and Utilization Management:

The factors in Column 4 reflect the impact of differences in the network size, efficiency, and provider contract terms. We worked with our contracting area and other subject matter experts to review the impact of these differences and the expected impact on allowed claims.

D. Benefits in addition to EHBs:

[REDACTED]

E. Catastrophic Plan Eligibility:

This filing does not include catastrophic plans.

F. Experience Period Plan Adjusted Index Rates

Worksheet 2 of the URRT displays the Plan Adjusted Index Rates for the experience period. Since these values were not explicitly developed as part of our 2014 rate filings, we have approximated the values that would have been filed. The approach used to develop these values starts with the 2014 plan-specific base rates (the premium rate that would have been charged for a member with 1.0 age, area, and tobacco factors), and multiplies them by the average age and area factors that were projected in the 2014 filing. For Small Group plans, we also multiply by the average trend factor that was expected to be charged based on the anticipated distribution of effective dates from the January 1, 2014 filing.

17. Calibration

A. Age Curve Calibration:

The age factors are based on the HHS Default Standard Age curve.

[REDACTED]

B. Geographic Factor Calibration:

[REDACTED]

C. Quarterly Trend Calibration:

[REDACTED]

18. Consumer-Adjusted Premium Rate Development

Rates are determined using the prescribed member build-up approach. In the event that a family includes more than three child dependents under age 21, only the three oldest child dependents will be considered in determining the family's premium. Additional child dependents (non-billable members) will not be included in the rate calculation.

The premium for each billable member is calculated as:

$$\text{Calibrated Plan Adjusted Index Rate} * \text{Age Factor} * \text{Area Factor} * \text{Trend Factor}$$

The resulting rate is rounded to the nearest cent, and rates are then summed for all billable family members.

[REDACTED]

[REDACTED]							
[REDACTED]							
[REDACTED]							
[REDACTED]							
[REDACTED]							
[REDACTED]							

[REDACTED]

19. Composite Premiums

[REDACTED]

20. AV Metal Values

The AV Metal Values on Worksheet 2 were based on the AV Calculator. As applicable, entries were modified to reflect the plan appropriately and/or adjustments were made for plan design features that could not be entered in the calculator per 45 CFR Part 156, §156.135. The accompanying certification discusses how the benefits were modified to fit the parameters and the development of any adjustments. The AV screen shots provide detail on the modified entries and adjustments to AV, as applicable.

21. AV Pricing Values

The AV Pricing Values are calculated as the ratio of the Plan Adjusted Index Rate to the Market Adjusted Index Rate. The adjustments reflected in the AV Pricing Values are discussed in Section 16. AV Pricing Values do not differ based on morbidity differences or benefit selection anticipated within the Single Risk Pool.

22. Membership Projections

[REDACTED]

23. Terminated Products

The following products will be closed to new sales prior to January 1, 2016:

- 64844PA001 (Aetna Health Maintenance Organization)

Consistent with the URRT instructions, experience for non-single risk pool terminated products is reported in aggregate under the terminated product with the largest membership in the experience period.

A mapping of 2014 ACA-compliant plans to 2016 plans is provided in Exhibit I. The exhibit also identifies plans that have been terminated and will not be offered in 2016.

24. Plan Type

All plans are consistent with the plan type indicated on Worksheet 2.

25. Warning Alerts

The Experience Period Plan Adjusted Index Rate on Worksheet 2 differs from the Experience Period Premium PMPM on Worksheet 1 since the Experience Period Premium reflects the actual enrollment mix for all non-grandfathered business in the market in 2014 while the average Plan Adjusted Index Rate reflects the projected (vs. actual) ACA mix for single risk pool experience and a zero rate for non-single risk pool experience.

For the same reason, Total Premium (TP) differs between Worksheets 1 and 2.

The Projected Plan Adjusted Index Rate on Worksheet 2 differs from the Gross Premium Average Rate on Worksheet 1. This difference results from the value on Worksheet 1 being the rate that corresponds to claims incurred in the 12 months starting January 1, 2016, while the average on Worksheet 2 is the average rate for the market for coverage that begins between January 1, 2016 and December 31, 2016.

For the same reason, Total Premium (TP) differs between Worksheets 1 and 2.

26. Benefit Design

This filing includes the following standard plans: eight Bronze, 36 Silver, 28 Gold, and four Platinum.

Please refer to the corresponding policy forms for detailed benefit language. All benefit and cost sharing parameters comply with Pennsylvania benefit mandates and the requirements of PPACA, including preventive care benefits, deductible limits, and Actuarial Value requirements.

27. Marketing

Plans will be marketed through brokers and general agents.

28. Underwriting

Aetna will verify applicant eligibility for these plans based on any applicable age or geographic limitations.

29. Renewability

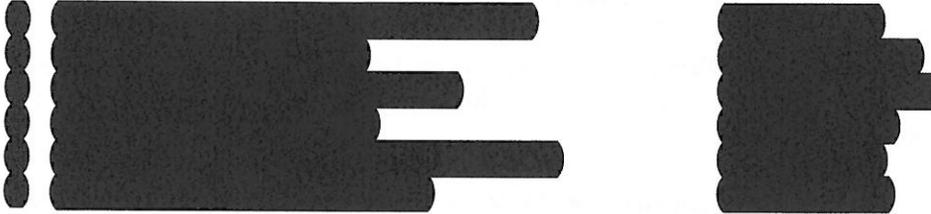
These policies are guaranteed renewable as required under §2703 of the Public Health Service Act.

30. Company Financial Condition

As of December 31, 2014, the capital and surplus held by Aetna Health, Inc. of PA was approximately \$447 million. This amount is disclosed in the Company's statutory financial statement dated December 31, 2014. The Company issues commercial and Medicare Advantage coverage in various states for multiple business segments, including to large employer, small employer, and individual purchasers.

Reliance

While I have reviewed the reasonableness of the assumptions in support of both the preparation of the Part I Unified Rate Review Template and the assumptions in support of the rate development applicable to the products discussed in this filing, I relied on the expertise of the following noted individuals, along with work products produced at their direction, for the following items:



Certification

While this memorandum discusses both our development of rates for these products and the completion of the Part I Unified Rate Review Template (URRT), the Part I URRT does not demonstrate the process used by Aetna to develop the rates. Rather, it represents information required by Federal regulation to be provided in support of the review of rate increases, for certification of qualified health plans for Federally-facilitated marketplaces, and for certification that the index rate is developed in accordance with Federal regulation, is used consistently, and is only adjusted by the allowable modifiers. The information provided above is intended to comply with these requirements.

I, [REDACTED] am a Fellow of the Society of Actuaries, a member of the American Academy of Actuaries, and am qualified in the area of health insurance. I hereby certify that to the best of my knowledge and judgment:

1. This rate filing is in compliance with the applicable laws and regulations of Pennsylvania, the requirements under federal law and regulation, and all applicable Actuarial Standards of Practice, including but not limited to:
 - a. ASOP No. 5, Incurred Health and Disability Claims
 - b. ASOP No. 8, Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health
 - c. ASOP No. 12, Risk Classification
 - d. ASOP No. 23, Data Quality
 - e. ASOP No. 25, Credibility Procedures Applicable to Accident and Health, Group Term Life, and Property/Casualty Coverages
 - f. ASOP No. 26, Compliance with Statutory and Regulatory Requirements for the Actuarial Certification of Small Employer Health Benefit Plans
 - g. ASOP No. 41, Actuarial Communications.

2. The Projected Index Rate is:
 - a. In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.80(d)(1)),
 - b. Developed in compliance with the applicable Actuarial Standards of Practice,
 - c. Reasonable in relation to the benefits provided and the population anticipated to be covered,
 - d. Neither excessive, deficient, nor unfairly discriminatory.

3. 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.
4. 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.
5. The geographic rating factors reflect only differences in the costs of delivery (which include unit costs and provider practice pattern differences) and do not include differences for population morbidity by geographic area.
6. 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. Adjustments made to reflect benefit features not handled by the AV Calculator are discussed in the attached certification required by 45 CFR Part 156, §156.135.

May 6, 2015

Date

[Redacted Signature]

SERFF Tracking #:

AETN-130046890

State Tracking #:

AETN-130046890

Company Tracking #:

State:

Pennsylvania

Filing Company:

Aetna Health Insurance Company

TOI/Sub-TOI:

H15G Group Health - Hospital/Surgical/Medical Expense/H15G.003 Small Group Only

Product Name:

2016 PA SG AHIC filing

Project Name/Number:

2016 PA SG AHIC filing/

Correspondence Summary

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Industry Response	Art Lucker	05/22/2015	05/22/2015

Response Letters

Responded By	Created On	Date Submitted
Andrew Adams	06/08/2015	06/08/2015

State: Pennsylvania **Filing Company:** Aetna Health Insurance Company
TOI/Sub-TOI: H15G Group Health - Hospital/Surgical/Medical Expense/H15G.003 Small Group Only
Product Name: 2016 PA SG AHIC filing
Project Name/Number: 2016 PA SG AHIC filing/

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	05/22/2015
Submitted Date	05/22/2015
Respond By Date	06/12/2015

Dear Andrew Adams,

Introduction:

Objection 1

- Actuarial Memorandum and Certifications (Supporting Document)
- Unified Rate Review Template (Supporting Document)

Comments: Please see attached file which contains INS's request for additional information.

Conclusion:

Sincerely,
Art Lucker



INS CONSULTANTS, INC.

Insurance Regulatory Consultants

419 S. 2nd Street
New Market, Suite 206
Philadelphia, PA 19147
Phone: (215) 625-9877
Fax: (215) 627-7104

TO: Andrew Adams, FSA, MAAA
Assistant Actuary
Aetna Life Insurance Company

FROM: Mark Golab, FSA, MAAA
INS Consultants, Inc.

DATE: May 22, 2015

SUBJECT: Aetna Health Insurance Company
SERFF Tracking Number: AETN-130046890
Small Group POS and HMO Rates for Calendar Year 2016

INS has been engaged by the Pennsylvania Insurance Department to review the material filed in support of the subject rate filing. Based on our continuing review, we have identified certain aspects of the filing which require clarification and/or additional information; these items are discussed below. Upon receipt of the requested information, we will continue our review of the subject filing.

A. Rate Increase

1. The filing indicates the weighted average increase across plans based on current ACA-compliant membership, inclusive of the impact of benefit and cost sharing changes is 6.1%. Please show how this average breaks down by the following:

- Impact of medical claim trend;
- Revisions to assumptions about population morbidity and the projected population distribution;
- Changes to the reinsurance program;
- Changes in cost sharing to ensure that plans comply with Actuarial Value requirements;
- Changes in pricing models used to determine the impact of cost sharing design;
- Changes in provider networks and contracts.

B. Experience Premiums and Claims

1. Please provide the Company's 2014 Supplemental Health Care Exhibit for the Small Group market.
2. Regarding the incurred but not reported claim estimate, please provide the completion factors that were used to develop this estimate. Also, identify the book of business that served as the experience

basis for this application. If the commercial book of business including individual, small group and large group fully insured business was used, please provide empirical support, if available, that justifies the appropriateness of using the commercial pool lag experience to compute incurred claim estimates for the small group market.

3. With regard to allowed claims during the experience period of \$380,113,900, please identify, if any, the estimate of allowed claims incurred but not reported which is included in this figure. Also, please show the development of this estimate.

4. Please identify the specific seasonal factors, if any, that were used as a part of the methodology to develop incurred claim estimates. If such factors were used, please provide an example showing how these factors were used.

5. The actuarial memorandum indicates that claim experience in Worksheet 1, Section 1 of the Unified Rate Review Template (URRT) reflects dates of service from January 1, 2014 through December 31, 2014 and paid through January 31, 2015. Please advise how dates of service are assigned under the various benefit categories. Please confirm that incurred claims of \$312,672,322 were determined as allowed claims less member cost sharing and cost sharing paid by HHS of low-income members.

C. Benefit Categories

1. Please confirm that the benefit categorization described in the actuarial memorandum is materially consistent with the category definitions provided in the CMS Unified Rate Review Template instructions.

D. Credibility Manual Rate

1. The actuarial memorandum indicates that the source data for the manual rate was the experience incurred from January 1, 2014 to December 31, 2014 and paid through January 31, 2014 for both Aetna and Coventry in the Pennsylvania Small Group HMO/PPO market. Using this data, please show the development of the “utilization per 1000” and “average cost/service” figures, as shown in URRT worksheet1, section II, by benefit category. The requested development should follow the methodology of the URRT. Please provide an explanatory narrative for any adjustments from the experience period to the projection period.(see below)

D.1. Benefit Categories Underlying Credibility Manual Rate

1. Please confirm that the benefit categorization used to develop the credibility manual rate is materially consistent with the category definitions provided in the CMS Unified Rate Review Template instructions.

D.2. Projection Factors of Credibility Manual Rate

a. Please explain how you developed your estimated adjustment to cover changes in the morbidity of the population insured underlying the credibility manual rate. Please show the calculation of the adjustment factor(s). Also, in your explanation, please quantify the estimated impact of transitional

policies as well as the impact of group 51-100 Full Time Equivalent entering the small group market in 2016. Please identify your modeling assumptions in this regard.

b. Please identify the total “other” projection adjustment factors, underlying the credibility manual rate, by benefit category. Please provide a description of how such adjustments were quantified.

c. Please provide the calculations which produced the average cost factors included as a part of annualized trend, underlying the credibility manual rate, by benefit category.

d. Please provide the calculations which produced the utilization factors included as a part of annualized trend, underlying the credibility manual rate, by benefit category.

E. Paid to Allowed Ratio

1. The paid to allowed ratio for the experience period was 82.3%. Notwithstanding the role of the credibility manual rate, please comment on the reasons for the movement of this ratio from the experience period (82.3%) to the projection period (71.3%).

F. Non-Benefit Expenses and Profit and Risk

1. Regarding the general administrative expenses of 7.8% of premium. Please provide quantitative support for all such expenses. Please describe the methodology used for developing the estimate of these expenses expected during the projection period. Please discuss how the percentage load varies by plan. Please describe the source data that was used as a basis for the projections.

2. Please discuss the extent to which the target contribution to surplus has changed from the prior submission of similar forms.

G. Projected Loss Ratio

1. Please show the development of the anticipated MLR of 88.9%.

H. Single Risk Pool

1. Please discuss how the experience of transitional product/plans, if any, has affected the base period experience. Further, please discuss how expected transitional plan experience and the expected experience of group 51-100 Full Time Equivalent entering the small group market in 2016 are reflected in the projection.

I. Index Rate

1. Please identify and quantify the underlying reason for the difference between the projected allowed experience claims pmpm (\$491.11) and the first quarter 2016 index rate for projection period (\$490.24).

2. In developing the average index rate of \$510.82, please identify the assumptions underlying the assumed membership distribution effective in each quarter.

J. Market Adjusted Index Rate

1. Exhibit E-1 to the actuarial memorandum shows the development of the Market Adjusted Index Rate of \$514.19. Please show the calculations of “net reinsurance adjustment” of 1.006 reflected in this development.

K. Plan Adjustment Index Rates

1. Exhibit E-2 to the actuarial memorandum shows the development of the Plan Adjustment Index Rates. An “AV, Cost Sharing & Tobacco” factor is used in that development. Please show how the “AV, Cost Sharing & Tobacco” adjustment of .856 for the “PA Gold QPOS 1000 90/50” was calculated.

L. Calibration Factor

1. Regarding the calculation of the calibration factor in Exhibit E-2, that calculation includes a trend factor. The instructions relating to the calculation of the calibration factor permits only the inclusion of an age factor and a geography factor. Please adjust your calculation of the calibration factor accordingly.