May 16, 2023

Lindsi Swartz, MBA, MCM, Director<br>PA Department of Insurance<br>1311 Strawberry Square<br>Harrisburg, PA 17120

## RE: Jefferson Health Plans <br> NAIC Company ID\#: 95066 <br> Rate Filing for Individual Health Plans Effective 1/1/2024 <br> HEAL-133661025

Dear Ms. Swartz,
This rate filing contains the requested premium rate information for Jefferson Health Plans' (JHP) ACA-compliant individual health plans. The proposed rates are effective January 1, 2024. This filing has been submitted in SERFF under the tracking number HEAL-133661025.

Attached are the 2024 rate filing documents, per Federal and Pennsylvania guidelines. Included within this filing are the United Rate Review Submissions Parts I and III (Part II is not applicable), Rate Tables, Department Plan Design Summary and Rate Tables, Unique Plan Design Justification and Supporting Documentation, Department Standard Questions, PAAM Exhibits, and public rate filing redaction justification and checklist. JHP has elected to submit a single consolidated actuarial memorandum, which fully meets all the standards of both the Federal URRT instructions and the state instructions laid out in the PA 2024 ACA Final Rate Filing Guidance. We have included a crosswalk in the memorandum appendix that outlines in which sections the Federal requirements are satisfied.

Per guidance from the Pennsylvania Insurance Department (PID), this filing reflects a CSR defunding adjustment factor of 1.22 on all silver on-exchange plans, a user exchange fee of $3 \%$, the prescribed induced demand formula, and no adjustment for reinsurance. JHP intends to resubmit these documents on July 14, 2024 which will incorporated the plan year 2024 reinsurance parameters, per guidance from PID.

As plan year 2024 is JHP's first year in the Pennsylvania Individual Market, there is no rate change to report.

Information for the Pennsylvania Bulletin:

1. Company Name and NAIC Number $\begin{aligned} & \text { Jefferson Health Plans } \\ & 95066\end{aligned}$

## wakely

2. Market
3. On/Off or Off Exchange
4. Effective Date of Coverage
5. Average Rate Change Requested
6. Range of Rate Changes Requested
7. Total Additional Annual Revenue Generated from Proposed Rate Change
8. Products
9. Rating Areas and Any Changes from 2023
10. Metal Levels and Catastrophic Plans
11. Current Covered Lives and Policyholders as of February 1, 2023
12. Number of Plans Offered in 2024 and Change from 2023
13. Corresponding Contract Form Number, SERFF and Binder ID Numbers
14. HIOS Issuer ID Number and Submission Tracking Number

Individual
On and Off
January 1, 2024 to December 31, 2024
N/A
N/A
N/A

HMO
Rating Area 8
No change from 2023 (N/A)
Gold, Silver, Bronze
0

10 Plans in 2024
0 Plans in 2023
Form \#: HEAL-133635757
SERFF Filing \#: HEAL-133661025
Binder ID \#: HEAL-PA24-125116614
HIOS Issuer ID: 93909
State Tracking \#: HEAL-133635757

Date: May 16, 2023

## Actuarial Memorandum

## Jefferson Health Plans

## Issuer ID \#93909

Pennsylvania Individual Health Insurance 2024 Premium Rate Filing: CONFIDENTIAL

Date: May 16, 2023
Rates Effective: January 1, 2024

Developed by:
Wakely Consulting Group, LLC, an HMA Company

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## Executive Summary

This actuarial memorandum and the accompanying appendices represent documentation to support the filing of premium rates for Jefferson Health Plans (JHP) individual ACA products effective January 1, 2024. This actuarial memorandum fulfills the requirements for both the United Rate Review Part III Actuarial Memorandum and the Pennsylvania Actuarial Memorandum. As such, only one actuarial memorandum has been submitted with this filing. In Appendix A, we provided a crosswalk from the Pennsylvania Actuarial Memorandum to the United Rate Review Part III Actuarial Memorandum to ensure compliance with both sets of instructions and assist with review.

Per Pennsylvania Insurance Department (PID) guidance, the premium rates contained in this memorandum do not include the impact of the state-based reinsurance program, as defined within the 1332 waiver approved in 2021. The premium rates to be filed on July 14, 2023, will include the impact of the reinsurance program with the indicated parameters released by the PID.

This version of the actuarial memorandum is considered CONFIDENTIAL as it contains proprietary information related to JHP and Wakely Consulting Group, LLC, an HMA Company (Wakely). A separate actuarial memorandum was submitted and deemed PUBLIC which excluded all information determined to be confidential, according to PID guidance. Per PID instruction, we have submitted a redaction justification form along with this filing.

We believe the premium rates filed are reasonable in relation to the benefits provided and are not excessive, inadequate, or unfairly discriminatory based on the provisions of the ACA as currently implemented; however, future modifications in legislation, regulation, and/or court decisions may affect the extent to which the premium rates are neither excessive nor deficient. Wakely and JHP would like to reserve the right to change assumptions that were materially impacted due to a change in the regulatory environment up until filings are approved, in order to ensure our rates are as accurate as possible, to the extent state and federal rules allow.

## [REDACTED]

JHP is entering the PA market in 2024; therefore, this filing presents premium rates for new products. To be compliant with the ACA single risk pool regulation, on- and off-Exchange premium rates were developed together. The JHP products include gold, silver, and bronze plans. In total, JHP is filing 10 plans, plus CSR variants for all on-Exchange silver plans. Plans will be offered in Rating Area 8. Three plans will be offered on-Exchange only, three will be offered off-Exchange
only, and the remaining four plans will be offered both on- and off-Exchange, as shown in Table 1 below.

Plan designs include 2024 EHBs. Plans do not include pediatric dental as there are standalone pediatric dental plans available in the Philadelphia market already. There are no additional nonEHBs included in any plan designs. All plans are HMO, with only emergency services to be covered when incurred out of network.

Table 1: 2024 Proposed Plans

| Plan ID | Plan Name | Exchange | Service Area |
| :---: | :--- | :---: | :---: |
| 93909PA0010001 | Jefferson \$0 Deductible Bronze | On and Off | Rating Area 8 |
| 93909PA0010002 | Jefferson Total Bronze | On and Off | Rating Area 8 |
| 93909PA0010003 | Jefferson \$0 Deductible Silver | On | Rating Area 8 |
| 93909PA0010004 | Jefferson Balanced Silver | On | Rating Area 8 |
| 93909PA0010005 | Jefferson Total Silver | On | Rating Area 8 |
| 93909PA0010006 | Jefferson \$0 Gold | On and Off | Rating Area 8 |
| 93909PA0010007 | Jefferson Total Gold | On and Off | Rating Area 8 |
| 93909PA0010008 | Jefferson \$0 Deductible Silver Off- | Off | Rating Area 8 |
| 93909PA0010009 | Jefferson Balanced Silver Off-Exchange | Off | Rating Area 8 |
| 93909PA0010010 | Jefferson Total Silver Off-Exchange | Off | Rating Area 8 |

JHP products will be sold through an agency/broker model, through the internet, in direct response to incoming inquiries, and through the Pennsylvania Exchange. Products are guaranteed issue, guaranteed renewable, and issued on an issue age basis.

## 1. Basic Information and Data

## A. COMPANY INFORMATION

Company Legal Name: Jefferson Health Plans
State: PA

HIOS Issuer ID: 93909

Market: Individual

Effective Dates: January 1, 2024 - December 31, 2024

## Company Contact Information

Primary Contact Name: [REDACTED]

Primary Contact Telephone Number: [REDACTED]
Primary Contact Email Address: [REDACTED]

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

## Responsible Actuary Information

Responsible Actuary Name: [REDACTED]
Company: Wakely Consulting Group, LLC, an HMA Company
Phone Number: [REDACTED]
Email Address: [REDACTED]

## SERFF Rate Review Detail

Projected Earned Premium: \$18,091,708.

Projected Incurred Claims: \$15,494,769.

Proposed Rate Premium PMPM: Min: \$172.03. Max: $\$ 1,122.55$. Weighted Average: $\$ 502.55$.
Please note that the premium PMPMs are indicative of age-specific rates and include a blend of tobacco-rate and non-tobacco rate plans.

## Other General Information

Type of Filing: New Entry

Type of Plan: HMO On and Off-Exchange; New Business
Months of Rate Guarantee: These rates will be guaranteed until December 31, 2024.

## B. RATE HISTORY AND PROPOSED VARIATIONS IN RATE CHANGES

JHP is a new plan in 2024 and, therefore, does not have a rate increase from 2023 to 2024.

## C. AVERAGE RATE CHANGE

JHP is a new plan in 2024 and, therefore, does not have a rate increase from 2023 to 2024.

## D. MEMBERSHIP COUNT

JHP is a new plan in 2024 and, therefore, does not have any experience period or current membership to report. Projected 2024 membership by metal is included in Table 1 of the PAAM Exhibits. Actual enrollment is highly dependent on consumer decisions and the competitiveness of rates in the market.

Table 2 shows 2024 JHP individual enrollment projections by plan.

Table 2: Estimated JHP Enrollment by Plan (in Member Months)

| Plan ID | Plan Name | Member Months |
| :--- | :--- | ---: |
| 93909PA0010001 | Jefferson \$0 Deductible Bronze | 4,860 |
| 93909PA0010002 | Jefferson Total Bronze | 4,860 |
| 93909PA0010003 | Jefferson \$0 Deductible Silver | 5,357 |
| 93909PA0010004 | Jefferson Balanced Silver | 6,250 |
| 93909PA0010005 | Jefferson Total Silver | 6,250 |
| 93909PA0010006 | Jefferson \$0 Gold | 990 |
| 93909PA0010007 | Jefferson Total Gold | 2,970 |
| 93909PA0010008 | Jefferson \$0 Deductible Silver Off-Exchange | 1,339 |
| 93909PA0010009 | Jefferson Balanced Silver Off-Exchange | 1,562 |
| 93909PA0010010 | Jefferson Total Silver Off-Exchange | 1,562 |

## E. BENEFIT CHANGES

JHP is a new plan in 2024 and, therefore, does not have any benefit changes from 2023 to 2024.

## F. EXPERIENCE PERIOD CLAIMS AND PREMIUM

JHP will begin offering products effective January 1, 2024; therefore, there is no JHP experience to report. For this reason, Tables 2-4 of the PAAM Exhibits and Worksheet I of the URRT have been left blank. The 2024 rates are based entirely on a manual rate as discussed in the next section of this memorandum, and as shown in Tables 2b-4b of the PAAM Exhibits.

## Projection Factors

Initial products will be effective January 1, 2024; therefore, projection factors for purposes of moving the experience forward to the projection period are not applicable. In the Rate Development \& Change section of this report, we discuss the development of claim costs used within the base periods and factors applied from the base period to the projection period as a basis for the development of the index rate and base rate.

## G. CREDIBILITY OF DATA

Given JHP will begin offering products effective January 1, 2024, and has no experience to report, $100 \%$ credibility is assigned to the manual rate. The manual rate source is described below.

## Base Period Claims

Allowed PMPM medical and pharmacy claim costs were developed using two different data sources, intended to identify a reasonable range of potential outcomes and to confirm reasonableness of the developed projections. Throughout this document, the two developments are referred to as Method 1 and Method 2 as defined below:

- Method 1: 2019 PA ACA individual statewide incurred claims from 2021 URRTs.
- Method 2: 2021 PA ACA individual statewide incurred claims from 2023 URRTs.


## METHOD 1

Method 1 relies on 2019 ACA individual statewide Pennsylvania incurred claims data summarized from the 2021 URRTs. This represents a full year of pre-COVID-19 Pennsylvania ACA data available publicly. Pharmacy payments are assumed to be reduced for rebates. Claims have been adjusted to exclude non-EHBs. This data is assumed to be complete.

## METHOD 2

Method 2 relies on 2021 ACA individual statewide Pennsylvania incurred claims data summarized from the 2023 URRTs. This represents the most recent year of Pennsylvania ACA data available publicly. Pharmacy payments are assumed to be reduced for rebates. Claims have been adjusted to exclude non-EHBs. This data is assumed to be complete.

Wakely believes both methods are reasonable and actuarially sound and has elected to weight the 2019 and 2021 public statewide methods equally for purposes of the rate development. The data presented in Table 2b of the PAAM exhibits represents the 50/50 blend of the Method 1 and Method 2 base period data, as used for the rate development, before the adjustments discussed below were applied.

## Adjustments Made to the Base Data

The base period allowed PMPMs were adjusted for items including differences in membership mix by metal, risk, average age, geographic service area, utilization and unit cost trends, provider contracts, and COVID-19 impact. Factors to account for these adjustments were applied to the base period total allowed EHB claims to develop the projected index rate in Table 5 of the PAAM Exhibits. Development of these adjustment factors is detailed in the "Rate Development and Change" section of this memorandum.

## H. TREND IDENTIFICATION

As 2024 is JHP's first year in the market, the trends were developed using public data sources and PA insights from JHP; no experience trends were analyzed. Thus, Table 3 has been intentionally left blank.

An explanation of the trend development for values provided in Table 3b of the PAAM exhibits is provided in section 2, Rate Development \& Change.

## I. HISTORICAL EXPERIENCE

As 2024 is JHP's first year in the market, there is no historical experience. Table 4 has been intentionally left blank.

The historical experience used to fill out Table 4b is from Pennsylvania Individual URRT data from 2019-2021, as described in section 1G. Please note that the data in the URRT is provided on an annual basis only. The monthly splits shown in Table 4b are for illustrative purposes only. The 2022 section is not able to be filled in as that data is not available yet.

## 2. Rate Development and Change

## A. PROJECTED INDEX RATE, MARKET-ADJUSTED INDEX RATE \& TOTAL ALLOWED CLAIMS

Please see Table 5 of the PAAM exhibits for the development of the projected index rate. The development of the single risk pool adjustment factors is provided in Appendix B.

## Total Allowed Claims

Section 1G describes the source for the base period total allowed EHB claims in cell D11 of Table 5. The adjustment factors described below are used to calculate the projected index rate of $\$ 505.05$ in cell C27 of Table 5.

## TREND FACTORS

Trend estimates used in the JHP 2024 rate development were based on a review of prospective claim cost trend information published in the 2021 and 2023 Pennsylvania URRT individual rate filings, as well as other public data source information and JHP market insights. Due to differences in market utilization and unit cost pressures from 2019 through 2024, different annual trends were estimated for each year from base period to projection period. A range of reasonable trend assumptions was identified before selecting the used trends.

While the trend factor displayed in cell C12 of Table 5 is excluding the impact of COVID-19, when developing trend estimates, results were reviewed in tandem with the effect of COVID-19 from the base period to the projection period for reasonability. In pricing, different trend factors were used to project the 2019 and 2021 base periods to the projection period. The value in C12 represents a weighted average trend factor for two years assuming the base period is on a 2022 basis.

## CHANGES IN MORBIDITY

Per PID guidance, the impact of morbidity due to the reinsurance program is $0 \%$, as shown in cell D15 of Table 5.

For both Methods of the 2024 premium development, JHP is not applying any changes in morbidity to the risk pool from the base prior to the projection periods that aren't already accounted
for in JHP's projected age, metal, and risk mixes. Therefore, we are not adjusting the morbidity of the base period to the projection period, and the adjustment factor in cell D16 of Table 5 is 1.0.

## CHANGES IN DEMOGRAPHICS (MEMBERSHIP MIX AND GEOGRAPHY)

## METHOD 1

In Method 1, a two-step approach was taken to account for changes in membership mix by age band, metal tier, and geographic location between the base period Pennsylvania Individual market statewide experience and the 2024 JHP estimated membership. Allowed claims were decreased based on changes in membership mix by age band and metal tier between the base period URRT experience and the 2024 JHP estimated membership in Pennsylvania. We took the following steps using relativities based on allowed claims:

1) Adjusted from the base year statewide Pennsylvania enrollment mix by rating area to JHP's projected rating area mix in their 2024 service area.
2) Adjusted from the base year statewide Pennsylvania enrollment mix by age band and metal to JHP's projected age band and metal mix in their 2024 service area.

Adjustment 1) uses the 2022 Interim Risk Adjustment Report (IRAR) relativities to calculate an average statewide geographic cost factor. The corresponding relativities were then weighted by the estimated membership mix in JHP's service area. The ratio of the average cost factor for JHP's distribution within its service area to that of the statewide distribution represents the geographic adjustments.

Adjustment 2) represents utilization differences based on variance between the starting age and metal distribution and the ending age and metal distribution. Utilization differences by age band and metal tier were derived using Wakely's proprietary database which consists of a nationallyrepresentative sample of approximately 41.3 million member months comprised of individual data for ACA-compliant plans. This data set is considered fully credible at each metal level.

These adjustments are illustrated in Appendix B. For Adjustment (2), we are unable to share the actual data underlying the proprietary database, however the exhibit illustrates our methodology for this adjustment using arbitrary numbers.

## METHOD 2

In Method 2, we followed the same approach as Method 1.
The factor shown in D18 of Table 5 within the PAAM exhibits represents the 50/50 blend of the allowed claims costs factors developed by Method 1 and Method 2.

## CHANGE IN NETWORK (PROVIDER CONTRACTING)

## [REDACTED]

## CHANGE IN BENEFITS

A multiplicative factor was applied to reduce the base period claims by the average amount of non-EHB claims in the base periods, as defined in the 2019 and 2021 URRT submissions. The same methodology was used to remove non-EHB claims from Method 1 and Method 2. An reduction of $\$ 0.81$ PMPM is already accounted for in cell D11 of Table 5 , so it is not included as an adjustment factor in cells D15:D21.

No other adjustments were made as there have been no changes in EHBs or state mandated benefits in Pennsylvania since before the base period year. JHP is not offering benefits in addition to the EHBs in 2024, so cell C38 of Table 5 is $\$ 0$.

## CHANGE IN OTHER (COVID-19 IMPACT)

## [REDACTED]

## PEDIATRIC DENTAL COSTS

No adjustments were made to account for pediatric dental costs.

## INCLUSION OF CAPITATION PAYMENT

There are no capitated payments in the projection period to consider for the development of the index rate.

## Paid to Allowed Ratio

Plan designs were modeled within the Wakely Pricing Valuation Model (WPVM), based on detailed claim data from Wakely Proprietary ACA database, to develop paid-to-allowed pricing estimates (as opposed to the actuarial values from the federal AV calculator). The data is a nationally-representative sample of over 4 million lives comprised of individual data for ACAcompliant plans. The model uses actuarially sound pricing methods to value the impact of deductibles, copays, coinsurance and maximum out-of-pocket cost sharing parameters. We calibrated the utilization and unit cost assumptions in the model to the plan's prospective allowed costs, adjusting for induced demand by metal tier. The purpose of this is to calculate variation of actuarial values for pricing based on plan-specific cost-sharing.

The mandated CSR load of $22 \%$ for individuals enrolled within silver cost-share reduction variant plans was applied to silver on-Exchange plan pricing AVs. While PID allows for a range between $22 \%$ to $26 \%$, we believe that a load of $22 \%$ will be sufficient based on enrollment estimates.

We then applied the pricing actuarial value for each plan to the JHP 2024 index rate for premium rate development.

Wakely used an override in cell C28 of Table 5 to better reflect our pricing methodology. The value in C28 can be calculated by weighting the pricing AVs, Non-Funding of CSR Adjustment, and Benefit Richness (Induced Demand) factors on tab "III Plan Rates".

## Projected Risk Adjustment PMPM

The risk adjustment transfer amount was calculated to arrive at an estimated transfer amount for JHP's population. Various adjustments such as risk adjustment model methodology changes, age and metal mix distribution shifts, geographic differences, and statewide average premium increases from the base period to 2024 were incorporated to obtain an estimated 2024 risk adjustment transfer.

We took the following steps to arrive at a projected risk adjustment transfer:

- At the metal level, each factor of the risk transfer formula was calculated separately for JHP's expected population and the statewide Pennsylvania 2024 estimates.
- ARF - Age Rating Factors for JHP and Pennsylvania statewide were calculated based on the same enrollment mix by age band as was assumed in the claims buildup.
- AV - Actuarial Value for Pennsylvania statewide was based on the same statewide Pennsylvania metal mix as was assumed in the claims buildup.
- PLRS - Plan Liability Risk Score for statewide Pennsylvania and JHP started from the average PLRS in the WACA data, specifically for members with the same age and metal mix as either statewide Pennsylvania or JHP's expected population in 2024.
- GCF - Geographic Cost Factors for JHP reflect their proposed service area.
- Using the above factors and an estimated statewide average premium, an estimated risk transfer for JHP was calculated at the metal level. This transfer amount was then weighted by JHP's expected metal mix in Pennsylvania in 2024.
- Then, a load was added to the risk adjustment transfer to account for the estimated highcost risk pooling charge in 2024, calculated as a percent of premium.
- Finally, the risk adjustment transfer PMPM was converted from a paid to an allowed amount (dividing by expected actuarial value) necessary to capture sufficient premiums to cover anticipated transfer payments.


## [REDACTED]

The 2024 risk adjustment user fee of $\$ 0.21$ PMPM was included in the taxes and fees section of the rate development.

## Projected Exchange User Fees PMPM

The projected exchange user fees were calculated using a $3.0 \%$ exchange fee, per PID guidance. JHP is projecting that $80 \%$ of their 2024 membership will be on the exchange, so the effective exchange user fee is $2.4 \%$.

## Projected ACA Reinsurance Recoveries Net of Reinsurance Premium

Per state guidance, we have removed the impact of the added state-based reinsurance by setting the program's coinsurance to $0 \%$. We will revise this impact for the July $14^{\text {th }}$ filing pending guidance from PID. Below describes our methodology for quantifying the impact of the statebased reimbursement.

The claims portion of the index rate was reduced to reflect the estimated impact of the statebased reinsurance reimbursement amounts. Because JHP is only filing in one rating area in 2024, and because the reinsurance parameters are not projected to vary by region, the geographic factor is not impacted by reinsurance.

The information in Tab llb was developed using Wakely's proprietary database of nationallyrepresentative 2019 ACA individual market data. First, members were assigned to allowed claim buckets based on their total annual allowed spend. Paid PMPMs were determined using planlevel cost sharing parameters consistent with the pricing AV development. An effective reinsurance recovery was then calculated for each claim bucket, using the calculated paid PMPMs and the reinsurance program attachment points and coinsurance. The data provided in Tab llb was scaled down to match the experience period membership provided in Table 2b.

We have intentionally left Tab Ila blank as JHP does not have experience to report.

## Market-Adjusted Projected Allowed Total Claims PMPM

As described above, each Method arrives at an allowed claims cost estimate for the average age, metal, and risk of JHP's population in the Pennsylvania market. Then, the JHP's risk adjustment transfer estimate is added to the blended allowed claims cost to arrive at a total allowed cost (claims and risk adjustment).

The two-method development allows us to use different base period information, with adjustments, to understand the sensitivity of particular assumptions. Wakely believes all methods are reasonable and actuarially sound and has elected to weight the 2021 and 2019 public statewide Methods equally. The blended projected allowed claim costs net of reinsurance was added to the projected risk adjustment transfer and exchange user fees to arrive at the total market-adjusted projected allowed cost PMPM (claims and risk adjustment) equal to $\$ 587.81$ PMPM.

Please see Appendix D and Table 5 of the PAAM exhibits for more details.

## B. RETENTION ITEMS

The retention items described below are illustrated in Table 6 of the PAAM exhibits. Please note that values in Table 6 vary slightly from those mentioned in this memorandum, as the values used in Table 6 represent the straight average of the retention components across all plans, whereas we report total retention on a projected membership weighted average basis.

## Administrative Expense Load

We incorporated a retention load for general administrative expenses, commissions, and quality improvement initiatives. These costs are a combination of fixed and variable, and in total are equal to $9 \%$ of premium in the 2024 rate development. It was confirmed with JHP that the assumptions for 2024 administrative costs are reasonable estimates based on the estimation of covered members. The general administrative and claims expense load varies by metal level such that the PMPM costs among bronze and silver plans are similar; given the silver premium rates are higher than bronze, the percentage of administrative expenses are lower on silver compared to bronze. Additional costs are estimated for gold plans due to the associated care management costs, clinical program needs, and increased service requirements involved with a population of generally higher risk and utilization.

The administrative expense load is split into three components:

- General and claims: $6.5 \%$
- Agent/Broker Fees and Commissions: 1.6\%
- Quality Improvement Initiatives: 0.8\%


## [REDACTED]Profit / Contribution to Surplus \& Risk Margin

Overall, the profit margin is equal to $1 \%$ of proposed 2024, prior to federal income taxes. After accounting for federal income taxes, this amount decreases to $0.8 \%$.

## Taxes and Fees

Taxes and regulatory fees included in the development of 2023 rates include the following:

1. Federal Income Tax $=21.0 \%$ of taxable income.
2. Risk Adjustment User Fee $=\$ 0.21$ PMPM
3. Health Insurance Marketplace User Fee $=3 \%$. We have included this amount in our pricing of premium for all policies sold within the Marketplace. This fee was spread across all plans in the risk pool. We assumed that $80 \%$ of JHP's individual policies would be sold within the Marketplace. This resulted in a Marketplace User Fee of $2.4 \%$ of premiums, applied to policies sold in and outside the Marketplace.
4. Premium tax $=2 \%$ of premiums
5. PCORI Fee $=\$ 0.25$ PMPM

Table 3 below summarizes the non-benefit expenses, regulatory fees, and taxes.

Table 3: Non-Benefit Expenses and Profit \& Risk

| Component | \% of Premium |
| :--- | ---: |
| Commissions | $1.6 \%$ |
| Administration | $7.3 \%$ |
| Premium Taxes | $2.0 \%$ |
| Risk Adjustment Fee | $0.04 \%$ |
| Exchange User Fee | $2.4 \%$ |
| PCORI Fee | $0.05 \%$ |
| Profit/Risk Margin | $1.0 \%$ |
| Total Retention | $14.4 \%$ |
| Target Loss Ratio | $85.6 \%$ |
| Federal Loss Ratio | $90.7 \%$ |

## Projected Loss Ratio

The Anticipated Loss Ratio (ALR) is defined as being the present value of expected benefits over the present value of expected premiums for the time period that the premiums are effective. Wakely estimates the ALR to be $85.6 \%$. This calculation does not exclude any regulatory fees or taxes from premiums, which is why it is lower than the federal MLR calculation.

Based on the federal MLR methodology, the loss ratio is estimated to be $90.7 \%$; therefore, JHP does not anticipate paying consumer rebates for the 2024 plan year. Regulatory fees and taxes were excluded from premiums in the calculation of this value.

## C. NORMALIZED MARKET-ADJUSTED PROJECTED ALLOWED TOTAL CLAIMS

Age, geographic, tobacco, and network calibration factors are applied uniformly to all plans and illustrated in Table 7 of the PAAM exhibits. The factors described below also match those in the "Calibration" section of Table 10.

The development of the 2024 normalization factors is included within Appendix E.

## Age Calibration

Per the instructions, plan adjusted index rates were next calibrated to age 21. To bring the experience to age 21 rate, we divided the plan adjusted index rate by the weighted average age factor. The age factor was calculated using the Federal ACA age factors, as adopted by Pennsylvania, weighted by the estimated enrollment by age for JHP's Pennsylvania population in 2024. The age associated with this factor is between 50 and 51 years. Once calibrated, the standard federal age factors can be applied on a multiplicative basis to get to the rates for other ages.

## Tobacco Rating

The plan adjusted index rate must be on a non-tobacco user basis. Wakely looked at the proportion of Pennsylvania residents who are assumed to be tobacco users based on public source data, and then multiplied that by the proportion of those residents who are assumed to admit to smoking. This proportion can oftentimes vary by population and carrier but was assumed to be $50 \%$ for JHP based on general market observations. The final factor is intended to convert the rates to a non-tobacco basis. To bring the experience to an age 21 rate, we divided the plan adjusted index rate by the weighted average tobacco usage factor of 1.010.

The tobacco rate-up factor is 1.010 . We applied the same factor for all ages (21+) that are allowed to have a smoking factor.

## Geographic Factors

JHP will only be in one rating area therefore, we assumed a 1.000 geographic factor for all plans.

## Network Factor

JHP will only have one network, therefore, we assumed a 1.000 network factor for all plans.

## D. Components of Rate Change

JHP is a new plan in 2024, therefore, there is no rate change from 2023 to 2024.
For this reason, Table 8 of the PAAM exhibits is left mostly incomplete. Per PID rate filing guidance, the values in row H should approximate the values in row A. For JHP, the values in row A are producing errors, as the Total Calibrated Plan Adjusted Index Rate (PMPM) calculated in AA15 on "III Plan Rates" is based on current membership as of 02-01-2023, which JHP does not have. If we instead weight based on projected membership, the values in rows A and H do tie.

Table 9 is also not applicable since JHP is a new plan in 2024.

## 3. Plan Rate Development

## Single Risk Pool

JHP has established a single risk pool for all individual market business. Since JHP will be new to the individual market, all its individual business will be non-grandfathered, non-transitional, and ACA-compliant.

## Index Rate for Experience Period

JHP has no experience in Pennsylvania in 2022. Therefore, there is no experience period index rate.

## Index Rate for Projection Period

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The projection period claims portion of the index rate is estimated to be $\$ 505.05$ PMPM. This was calculated based on projected allowed claims for essential health benefits for the single risk pool population during the projection period.

## Market-Adjusted Index Rate for Projection Period

We then included the impact of risk adjustment, converted to an allowed basis, and the equivalent Marketplace User Fee (as described above), to calculate the 2024 market adjusted index rate. The market adjusted index rate is $\$ 587.81$ PMPM.

## Plan-Adjusted Index Rate for Projection Period

Plan adjusted index rates were developed by applying allowable plan level adjustments to the market adjusted index rate. The section below describes the components included in Table 10 of the PAAM exhibit which build up to the plan adjusted index rate.

## AV Metal Levels

The 2024 Federal Actuarial Value Calculator (AVC) was used to generate the AV metal tiers (URRT, Worksheet 2). We have incorporated the 2024 de minimus range to the allowed plans.

The final $A V$ is calculated in the Federal $A V$ Calculator by inputting the cost-sharing components for each plan (deductible, MOOP, coinsurance, etc.). To accommodate certain benefit designs, we made the following adjustments:

1. Tiers of Generic Drugs
a. On a subset of plans, JHP will offer two generic drug tiers with varying copays. As a result, a blended effective generic copay was input into the AV calculator to reflect the expected utilization between the two generic tiers.
2. \$0 Medical Deductible Plans
a. A subset of JHP's two-tier plans have a $\$ 0$ medical deductible and exclusively copays for medical cost sharing on the first tier only. Per CMS guidance provided in the 2024 Federal AV Calculator FAQ page, all plans of this structure may be run using the combined continuance tables. For these plans, we ran tiers one and two separately in the federal AV calculator, and then blended the resulting AVs using a projected utilization split to arrive at our effective federal AV for these plans.

The federal AVs for the plans are shown in Appendix F and in column H of Table 10 of the PAAM exhibits. In the event where both Approach 1 and Approach 2 were made to the Federal AVC inputs for the same plan to accommodate our benefit designs, we input Approach 2 in column I . More information regarding the adjustments have been included in unique plan design justification and documentation.

## AV Pricing Values

The methodology for development of the AV Pricing Values is included in the Projected Index Rate, Market-Adjusted Index Rate \& Total Allowed Claims section above. Only allowable modifiers were used in the development of these values.

## Differences in morbidity across metal tiers were not included in the pricing development for each metal tier plan.

The pricing AVs differ from the Federal AVC outputs primarily because the estimated allowed PMPMs used in developing pricing AVs are different than those underlying the Federal AV calculator. This is due to a leveraging effect for fixed cost sharing elements (e.g. copays, deductibles and MOOPs). The other variance is differences in the methodology of the pricing models and underlying data of the modeling. AV pricing values, prior to the addition of the CSR defunding adjustments for on exchange silver plans, are presented in column K of Table 10 of the PAAM exhibits.

We have included an adjustment to the filed plans to reflect the impact of cost share reduction subsidies (CSRs) no longer being funded by the federal government. The regulation still requires CSR variant plans to be offered to low-income members, under the same Federal AV requirements (keeping similar plan design and cost sharing structures as the current regulations), but the subsidy amounts will instead be a liability to the insurers and not the government. To reflect the additional cost of the CSRs for all JHP silver plans, we have increased the pricing AVs. This translates to the mandated increase of $22 \%$ (multiplicative) to on-Exchange silver pricing AVs. The CSR defunding adjustments are shown in column P of Table 10.

## Benefit Richness Factors

Per PID guidance, the benefit richness factors in column $L$ of Table 10 of the PAAM exhibits were calculated using the IU formula of (Plan AV)^2 - Plan AV + 1.24. The benefit richness factors shown here are normalized to a 1.0 using projected membership. These values are also shown in Appendix G.

Together, the product of the pricing AV, non-funding of CSR adjustment, and benefit richness factors are equivalent to the "AV and Cost Sharing" line within Worksheet 2 of the URRT.

## Adjustments for Benefits in Addition to EHB

JHP is not offering any benefits in addition to EHBs, so all factors in column M of Table 10 are 1.0.

## Adjustments for Provider Network

JHP is only offering one network, so all factors in column N of Table 10 are 1.0

## Adjustments for Catastrophic Eligibility

JHP is not offering catastrophic plans, so all factors in column O of Table 10 are 1.0.

## Adjustment for Administrative Costs, Taxes and Fees, and Profit or Contingency

Administrative costs vary by plan as discussed in section 2B above. The retention components are shown in columns R:T in Table 10 and in rows 2.6-2.8 of Worksheet 2 of the URRT. These components are reported as a percent of gross premium, per instructions.

## Calibrated Plan Adjusted Index Rate

The calibrated plan adjusted index rates PMPM calculated in row AA use the calibration factors described in section 2C. The values calculated in Table 10 match the values calculated in row 3.14 of Worksheet 2 of the URRT.

## 4. Plan Premium Development for 21-Year-Old Non-Tobacco User

## Consumer Adjusted Index rate

The consumer adjusted index rates were calculated by multiplying the calibrated plan adjusted index rates by the consumer's specific age factor (subject to maximum allowable rating of 3 dependents under age 21), area factor, and tobacco load as applicable.

We used the Federal ACA age factors, as adopted by Pennsylvania, for all members and geographic factors that were discussed previously. For tobacco factors, we used a level rating factor of 1.100 for all adult ages.

The rating factors are shown in Appendix H and the consumer adjusted index rates are provided in Table 11 of the PAAM Exhibits. The values in column AA of Table 11 match the age 21 nontobacco rates provided in the federal and state rate tables.

## 5. Plan Factors

## A. Age and Tobacco Factors

A description of these factors is included in section 2C. See table 12 of the PAAM exhibits for the age and tobacco factors used in the rate development process.

## B. Geographic Factors

A description of these factors is included in section 2C. See table 13 of the PAAM exhibits for the geographic factors used in the rate development process. As JHP is only entering rating area 8 in 2024, the geographic factor is 1.0 .

## C. Network Factors

A description of these factors is included in section 2C. See table 14 of the PAAM exhibits for the network factors used in the rate development process. As JHP only has one network in 2024, the network factor is 1.0 .

## D. Rate Change Summary

2024 is JHP's first year in the Individual ACA market. For that reason, the "Overview" and "Key Information" sections of tab "VI Rate Change Summary" of the PAAM exhibits have been left blank.

We confirm that the information in the "How It Plans to Spend Your Premium" section matches the retention and claims components in Tables 5 and 6, with the exception of the exchange user fees. As mentioned in section 2B above, the retention values shown in these tables are not necessarily reflective of our average projected retention due to enrollment weighting differences.

## E. Service Area Composition

JHP will only be entering Philadelphia, Montgomery, and Bucks counties within rating area 8 in 2024. This is reflected in the service area map.

## F. Composite Rating

JHP is not using composite rating in 2024.

## G. Connectivity Factors

JHP's 2024 products do not include connectivity features, and as such no connectivity factors are included in this rate filing.

## 6. Terminated Plans and Products

There will be no plans terminated in 2024 since JHP is filing all new plans.

## 7. URRT Warnings

There are no warnings appearing in the URRT.

## 8. Effective Rate Review Information

Additional information available upon request.

## 9. Reliance

Jefferson Partner Plans (JHP) has provided Wakely Consulting Group, LLC, an HMA Company, 8000 South Chester Street, Suite 650, Centennial, CO 80112 (Wakely) with information used to develop the 2024 Pennsylvania individual commercial product premium rates. This information includes, but is not limited to, the following:

- Estimated 2024 enrollment figures by rating area, metal, variant, network, and exchange status; and
- Geographic region to be covered in 2024; and
- Benefit designs illustrating Federal metal level compliance and compliance with Pennsylvania specific regulations; and
- Federal actuarial value calculator (AVC) inputs; and
- General administrative expenses, profit margin, and other retention components, with variations by plan, resulting in an estimated federal MLR equal to 90.7\%; and
- Confirmation that start-up costs incurred in 2023 should be excluded from administrative expense in 2024 pricing; and
- Quality initiatives (QI) allowed to be treated as QI under regulatory rules; and
- Product design information including a statement that 2024 coverage will only include EHBs, and will not cover pediatric dental, and
- Estimated contract reimbursements for tiers 1 and 2 providers; and
- PBM contracts and assumptions for items not yet determined; and
- Out-of-network (OON) utilization and unit cost assumptions; and
- Various competitor information including, but not limited to, projected 2024 rate increases by metal, provider networks, and new market entrants; and
- Proportion of CSR members estimated to be enrolled in JHP plans in 2024; and
- Plan design documentation and the method of plan adjudication; and
- Annual utilization trends for 2019-2024 by category of service.


## 10. Actuarial Certification

We both meet the Qualification Standards of Actuarial Opinion as adopted by the American Academy of Actuaries for preparing premium rate filings for insurers. This actuarial certification applies to the Jefferson Health Plans Individual products.

1. The premium rates filed are in compliance with applicable laws, rules and guidelines of the State of Pennsylvania.
2. The premium rates filed are reasonable in relation to the benefits provided and are not excessive, inadequate, or unfairly discriminatory based on the provisions of the ACA as currently implemented. The actuarial soundness of the block of business is dependent on projected membership distribution by plan, which we received from JHP.
3. The premium rates are calculated on the basis of sound actuarial principles.
4. The premium rates are reasonable when related to the applicable coverage and characteristics of the applicable class of enrollees.
5. The projected index rates are developed in accordance with all applicable State and federal statutes and regulations ( 45 CFR 156.80 and 147.102) and with allowable modifiers used in the development of plan specific premium rates.
6. The premium rates filed are in compliance with the Actuarial Standards of Practice (ASOPs) promulgated by the Actuarial Standards Board that are listed below:

ASOP No. 5, Incurred Health and Disability Claims
ASOP No. 8, Regulatory Filings for Health Plan Entities
ASOP No. 12, Risk Classification
ASOP No. 23, Data Quality
ASOP No. 25, Credibility Procedures Applicable to Accident and Health, Group Term Life, and Property/Casualty Coverages
ASOP No. 41, Actuarial Communication
ASOP No. 42, Determining Health and Disability Liabilities Other Than Liabilities for Incurred Claims
ASOP No. 50, Determining Minimum Value and Actuarial Value under the Affordable Care Act
ASOP No. 56, Modeling
In our opinion, the premiums are reasonable in relation to the benefits provided and the population anticipated to be covered. Further, the premiums are not estimated to be either excessive or deficient based on the provisions of the ACA as currently implemented. Actual experience will vary from the estimates given the inherent uncertainty in developing premium rates under the ACA.

The index rate, allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2), and Pennsylvania's mandated CSR load and HHS induced utilization formula 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 ASOPs.

The Federal AV Calculator (with some modification) was used to determine the AV Metal Values shown in Worksheet 2 of the Unified Rate Review Template for all plans.

The Part I Unified Rate Review Template does not demonstrate the process used 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 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.

Sincerely,

## [REDACTED]

Date: May 16, 2023

## Appendices

Appendix A - URRT III Actuarial Memorandum to PennsyIvania Actuarial Memorandum Crosswalk

Appendix B - Development of Single Risk Pool Adjustment Factors

Appendix C - Development of the Projected Risk Adjustment Transfer

Appendix D - Development of the 2024 Index Rate

Appendix E - Development of the Normalization Factors

Appendix F - Federal Actuarial Values

Appendix G - Induced Demand Factors

Appendix H - Rate Manual and Rate Formula

Appendix I - Projected Reinsurance Impact

## Appendix A

## URRT III Actuarial Memorandum to PennsyIvania Actuarial Memorandum Crosswalk

| Federal Memorandum Requirements | Corresponding Federal Memo Section | Pennsylvania Memo Requirement | Pennsylvania Section Number |
| :---: | :---: | :---: | :---: |
| General Information | Company Identifying Information | Basic Information and Data - Company | 1A |
|  | Company Contact Information |  |  |
| Proposed Rate Changes | Reason for Rate Increase(s) | Basic Information and Data - Rate History and Proposed Variations in Rate Changes | 18 |
|  |  | Basic Information and Data - Average Rate Change | 1 C |
|  |  | Rate Development \& Change Components of Rate Change | 2D |
|  |  | Plan actors - Rate Change Summary | 5D |
| Experience and Current Period Premium, Claims, and Enrollment | Paid through Date | Basic Information and Data Experience Period Claims and Premium | 1F |
|  | Current Date |  |  |
|  | Allowed and Incurred Claims Incurred During the Experience Period |  |  |
| Benefit Categories | Benefit Categories | Basic Information and Data - Benefit Changes | 1 E |
| Projection Factors | Trend Factors (Cost and utilization) <br> Morbidity Adjustment Demographic Shift Plan Design Changes Other Adjustments | Basic Information and Data - Trend Identification | 1H/2A |
|  |  | Rate Development \& Change Projected Index Rate, MarketAdjusted Index Rate \& Total Allowed Claims | 2A |
| Manual Rate Adjustments | Source and Appropriateness of Experience Data Used | Basic Information and Data - Historical Experience | 1 G |
|  | Adjustments Made to the Data | Rate Development \& Change Projected Index Rate, Market- | 2A |
|  | Inclusion of Capitation Payments |  |  |
| Credibility of Experience | Description of the credibility methodology used | Basic Information and Data Credibility of Data | 1 G |
|  | Resulting credibility level assigned to the base period experience |  |  |
| Establishing the Index Rate | Establishing the Index Rate | Plan Rate Development | 3 |
|  | Small Group Quarterly Rate Filings | N/A | N/A |
| Development of the Market-wide Adjusted Index Rate | Development of the Market-wide Adjusted Index Rate | Rate Development \& Change Projected Index Rate, Market- <br> Adjusted Index Rate \& Total Allowed Claims | 2A |
|  | Reinsurance |  |  |
|  | Risk Adjustment Payment/Charge |  |  |
|  | Exchange User Fees |  |  |
| Plan Level Adjusted Index Rate | Plan Level Adjusted Index Rate | Rate Development \& Change Retention Items | 2B |
|  |  | Plan Rate Development | 3 |
| Calibration | Age Curve Calibration | Rate Development \& Change Normalized Market-Adjusted Projected Allowed Total Claims | 2 C |
|  | Geographic Factor Calibration |  |  |
|  | Tobacco Use Rating Factor Calibration |  |  |
|  | The Calibration Adjustments are to be applied Uniformly to all plans |  |  |
| Consumer Adjusted Premium Rate Development | Consumer Adjusted Premium Rate Development | Plan Premium Development for 21-Year-Old Non-Tobacco User | 4 |
|  |  | Plan Factors | 5A-C |
| Projected Loss Ratio | Projected Loss Ratio | Rate Development \& Change Retention Items | 2B |
| Plan Product Information | AV Metal Values | Plan Rate Development | 3 |
|  | Membership Projections | Basic Information and Data Membership Count | 1D |
|  | Plan Type | Basic Information and Data - Company Information | 1A |
| Miscellaneous Instructions | Reliance | N/A | 9 |
|  | Actuarial Certification | Actuarial Certification | 10 |

## Appendix B

## Development of Single Risk Pool Adjustment Factors

## CHANGES IN DEMOGRAPHICS (GEOGRAPHIC MIX)

|  | 2022 <br> Statewide <br> distribution | 2022 Interim <br> GCF | JHP 2024 <br> projected <br> Membership |
| :--- | ---: | ---: | ---: |
| Rating Area | $4.4 \%$ | 0.897 | $0 \%$ |
| Rating Area 1 | $0.4 \%$ | 1.256 | $0 \%$ |
| Rating Area 2 | $8.2 \%$ | 1.036 | $0 \%$ |
| Rating Area 3 | $22.6 \%$ | 0.823 | $0 \%$ |
| Rating Area 4 | $3.8 \%$ | 0.985 | $0 \%$ |
| Rating Area 5 | $7.8 \%$ | 1.195 | $0 \%$ |
| Rating Area 6 | $10.0 \%$ | 1.309 | $0 \%$ |
| Rating Area 7 | $37.0 \%$ | 1.000 | $100 \%$ |
| Rating Area 8 | $5.7 \%$ | 1.203 | $0 \%$ |
| Rating Area 9 |  | 1.017 | $100 \%$ |
| Total Statewide Factor |  |  |  |


| JHP Geographic Adjustment | 0.983 |
| :--- | ---: |
| to Rating Area 8 |  |

to Rating Area 80.983

## Appendix B

## Development of Single Risk Pool Adjustment Factors

## CHANGES IN DEMOGRAPHICS (MEMBERSHIP MIX)

The allowed claim cost adjustment for demographic shift was calculated using allowed PMPM relativities between the base period and projection periods. We used average allowed PMPM claims by metal and age band from Wakely's proprietary individual ACA database and calculated an effective total allowed PMPM for the base and projection periods using the corresponding metal and age distributions.

While we are unable to share the actual data underlying the proprietary database, we created an exhibit that illustrates our methodology for this adjustment using arbitrary PMPMs.


| Adjustment Factors | $\begin{aligned} & \text { Base Period } \\ & \text { PMPM } \end{aligned}$ | Projection Period PMPM | $\begin{aligned} & \text { Adjustment } \\ & \text { Factor } \end{aligned}$ |
| :---: | :---: | :---: | :---: |
| Metrod 1 |  | ${ }_{\text {S4s3.13 }} 5$ | ${ }^{1.010}$ |
| Method2 |  | Ssss. 13 | 0.9 |



## Appendix B

## Development of Single Risk Pool Adjustment Factors

[REDACTED]

## Appendix C

## Development of the Projected Risk Adjustment Transfer

[REDACTED]

## Appendix D

## Development of the 2024 Index Rate

| Step | Formula | Description | Statewide PA 2019 URRT | Statewide PA 2021 URRT |
| :---: | :---: | :---: | :---: | :---: |
| 1 |  | Base Period Claims Allowed PMPM, with IBNR, Net of Rx Rebates | \$562.34 | \$609.98 |
| 2 |  | Allowed Claim Cost and Geographic Adjustment (to JHP Projected Age, Metal, and Risk, in JHP Service Area) | 0.888 | 0.880 |
| 3 |  | Market Morbidity Adjustment |  |  |
| 4 |  | PBM Savings |  |  |
| 5a |  | Average Annual Trend, Medical + Rx | 4.0\% | 5.7\% |
| 5b |  | Number of Years of Trend |  | 3 |
| 5 c |  | Final Trend Adjustment | 1.214 | 1.181 |
| 6 |  | COVID Impact |  |  |
| 6 |  | Provider Contracting |  |  |
| 7 | = [1] *[2] $\left.{ }^{\text {[ }} 3\right]^{*}[4]^{*}[5 \mathrm{c}]^{*}[6]$ | 2024 Projection Period Allowed Claim Cost PMPM | \$494.94 | \$515.16 |
| 8 |  | Weight by Method | 50\% | 50\% |
| 9 | = SUMPRODUCT([7], [8]) | 2024 Allowed Claim Cost PMPM, Weighted by Method |  |  |
| 10 |  | 2024 State Based Reinsurance Recovery on an Allowed Basis |  | . 00 |
| 11 | = [9]- [10] | 2024 Allowed Claim Cost PMPM, Reduced for State Based Reinsurance, Weighted by Method |  |  |
|  |  |  |  |  |
| 12 |  | 2024 Risk Adjustment Transfer PMPM |  |  |
| 13 |  | High Cost Risk Pool Fee |  |  |
| 14 | = [12] + [13] | 2024 Risk Adjustment Transfer PMPM |  |  |
| 15 |  | Projection Period AV |  |  |
| 16 | $=1 /[15]$ | Convert Paid to Allowed |  |  |
| 17 | = [14]* 16$]$ | 2024 Risk Adjustment Component of Allowed Costs |  |  |
|  |  |  |  |  |
| 18 | = [11] + [17] | 2024 JHP Allowed Claim Cost and Risk Adjustment Transfer and Reinsurance PMPM (Market Adj Index Rate) |  |  |
| 19 | = 3.0\% * 80\% | Exchange Fee | 2.4\% |  |
| 20 | [ 18 l$]+[19]$ | Final Market Adjusted Index Rate | \$587.81 |  |

## Appendix E

## Development of the 2024 Normalization Factors

## Age Calibration

| Age | Age Curve | 2024 Projected Age Distribution | Weighted Average Age Calibration Factor | 1.8085 |
| :---: | :---: | :---: | :---: | :---: |
| 0 | 0.765 | 0.3\% |  |  |
| 1 | 0.765 | 0.3\% |  |  |
| 2 | 0.765 | 0.3\% |  |  |
| 3 | 0.765 | 0.3\% |  |  |
| 4 | 0.765 | 0.3\% |  |  |
| 5 | 0.765 | 0.3\% |  |  |
| 6 | 0.765 | 0.3\% |  |  |
| 7 | 0.765 | 0.3\% |  |  |
| 8 | 0.765 | 0.3\% |  |  |
| 9 | 0.765 | 0.3\% |  |  |
| 10 | 0.765 | 0.3\% |  |  |
| 11 | 0.765 | 0.3\% |  |  |
| 12 | 0.765 | 0.3\% |  |  |
| 13 | 0.765 | 0.3\% |  |  |
| 14 | 0.765 | 0.3\% |  |  |
| 15 | 0.833 | 0.3\% |  |  |
| 16 | 0.859 | 0.3\% |  |  |
| 17 | 0.885 | 0.3\% |  |  |
| 18 | 0.913 | 0.9\% |  |  |
| 19 | 0.941 | 0.9\% |  |  |
| 20 | 0.970 | 0.9\% |  |  |
| 21 | 1.000 | 0.9\% |  |  |
| 22 | 1.000 | 0.9\% |  |  |
| 23 | 1.000 | 0.9\% |  |  |
| 24 | 1.000 | 0.9\% |  |  |
| 25 | 1.004 | 0.9\% |  |  |
| 26 | 1.024 | 1.8\% |  |  |
| 27 | 1.048 | 1.8\% |  |  |
| 28 | 1.087 | 1.8\% |  |  |
| 29 | 1.119 | 1.8\% |  |  |
| 30 | 1.135 | 1.8\% |  |  |
| 31 | 1.159 | 1.8\% |  |  |
| 32 | 1.183 | 1.8\% |  |  |
| 33 | 1.198 | 1.8\% |  |  |
| 34 | 1.214 | 1.8\% |  |  |
| 35 | 1.222 | 1.6\% |  |  |
| 36 | 1.230 | 1.6\% |  |  |
| 37 | 1.238 | 1.6\% |  |  |
| 38 | 1.246 | 1.6\% |  |  |
| 39 | 1.262 | 1.6\% |  |  |
| 40 | 1.278 | 1.6\% |  |  |
| 41 | 1.302 | 1.6\% |  |  |
| 42 | 1.325 | 1.6\% |  |  |
| 43 | 1.357 | 1.6\% |  |  |
| 44 | 1.397 | 1.6\% |  |  |
| 45 | 1.444 | 1.9\% |  |  |
| 46 | 1.500 | 1.9\% |  |  |
| 47 | 1.563 | 1.9\% |  |  |
| 48 | 1.635 | 1.9\% |  |  |
| 49 | 1.706 | 1.9\% |  |  |
| 50 | 1.786 | 1.9\% |  |  |
| 51 | 1.865 | 1.9\% |  |  |
| 52 | 1.952 | 1.9\% |  |  |
| 53 | 2.040 | 1.9\% |  |  |
| 54 | 2.135 | 1.9\% |  |  |
| 55 | 2.230 | 3.5\% |  |  |
| 56 | 2.333 | 3.5\% |  |  |
| 57 | 2.437 | 3.5\% |  |  |
| 58 | 2.548 | 3.5\% |  |  |
| 59 | 2.603 | 3.5\% |  |  |
| 60 | 2.714 | 3.5\% |  |  |
| 61 | 2.810 | 3.5\% |  |  |
| 62 | 2.873 | 3.5\% |  |  |
| 63 | 2.952 | 3.5\% |  |  |
| 64 | 3.000 | 3.5\% |  |  |
| 65+ | 3.000 | 1.6\% |  |  |

## Appendix E

## Development of the 2024 Normalization Factors

Tobacco Calibration

| Age | 2024 Projected <br> Age Distribution | Tobacco Factor |
| :---: | :---: | :---: |
| 0 | 0.3\% | 1.000 |
| 1 | 0.3\% | 1.000 |
| 2 | 0.3\% | 1.000 |
| 3 | 0.3\% | 1.000 |
| 4 | 0.3\% | 1.000 |
| 5 | 0.3\% | 1.000 |
| 6 | 0.3\% | 1.000 |
| 7 | 0.3\% | 1.000 |
| 8 | 0.3\% | 1.000 |
| 9 | 0.3\% | 1.000 |
| 10 | 0.3\% | 1.000 |
| 11 | 0.3\% | 1.000 |
| 12 | 0.3\% | 1.000 |
| 13 | 0.3\% | 1.000 |
| 14 | 0.3\% | 1.000 |
| 15 | 0.3\% | 1.000 |
| 16 | 0.3\% | 1.000 |
| 17 | 0.3\% | 1.000 |
| 18 | 0.9\% | 1.000 |
| 19 | 0.9\% | 1.000 |
| 20 | 0.9\% | 1.000 |
| 21 | 0.9\% | 1.100 |
| 22 | 0.9\% | 1.100 |
| 23 | 0.9\% | 1.100 |
| 24 | 0.9\% | 1.100 |
| 25 | 0.9\% | 1.100 |
| 26 | 1.8\% | 1.100 |
| 27 | 1.8\% | 1.100 |
| 28 | 1.8\% | 1.100 |
| 29 | 1.8\% | 1.100 |
| 30 | 1.8\% | 1.100 |
| 31 | 1.8\% | 1.100 |
| 32 | 1.8\% | 1.100 |
| 33 | 1.8\% | 1.100 |
| 34 | 1.8\% | 1.100 |
| 35 | 1.6\% | 1.100 |
| 36 | 1.6\% | 1.100 |
| 37 | 1.6\% | 1.100 |
| 38 | 1.6\% | 1.100 |
| 39 | 1.6\% | 1.100 |
| 40 | 1.6\% | 1.100 |
| 41 | 1.6\% | 1.100 |
| 42 | 1.6\% | 1.100 |
| 43 | 1.6\% | 1.100 |
| 44 | 1.6\% | 1.100 |
| 45 | 1.9\% | 1.100 |
| 46 | 1.9\% | 1.100 |
| 47 | 1.9\% | 1.100 |
| 48 | 1.9\% | 1.100 |
| 49 | 1.9\% | 1.100 |
| 50 | 1.9\% | 1.100 |
| 51 | 1.9\% | 1.100 |
| 52 | 1.9\% | 1.100 |
| 53 | 1.9\% | 1.100 |
| 54 | 1.9\% | 1.100 |
| 55 | 3.5\% | 1.100 |
| 56 | 3.5\% | 1.100 |
| 57 | 3.5\% | 1.100 |
| 58 | 3.5\% | 1.100 |
| 59 | 3.5\% | 1.100 |
| 60 | 3.5\% | 1.100 |
| 61 | 3.5\% | 1.100 |
| 62 | 3.5\% | 1.100 |
| 63 | 3.5\% | 1.100 |
| 64 | 3.5\% | 1.100 |
| $65+$ | 1.6\% | 1.100 |


| Component |  |
| :--- | ---: |
| Tobacco rating factor (for smokers only) | Value |
| Assumed tobacco use, ages 18+ | 1.092 |
| $\%$ of people who admit to smoking | $50.9 \%$ |
| $\%$ of people who can be rated for tobacco | $11.0 \%$ |
| Total rate-up based on admitted tobacco usage | 1.010 |

## Appendix E

## Development of the 2024 Normalization Factors

## Geographic Calibration

| Rating Area | Geographic <br> Factors |
| :--- | ---: |
| Rating Area 8 | 1.000 |
| Total, Membership Weighted | 1.000 |

## Network Calibration

| Network | Network Factor |
| :--- | ---: |
| Jefferson Health Plans HMO | 1.000 |
| Total, Membership Weighted | 1.000 |

## Appendix F

## Federal Actuarial Values

| Plan ID | Federal AV |
| :---: | :---: |
| 93909PA0010001 | $64.2 \%$ |
| 93909PA0010002 | $64.6 \%$ |
| 93909PA0010003 | $70.8 \%$ |
| 93909PA0010004 | $70.4 \%$ |
| 93909PA0010005 | $70.8 \%$ |
| 93909PA0010006 | $78.3 \%$ |
| 93909PA0010007 | $78.2 \%$ |
| 93909PA0010008 | $70.8 \%$ |
| 93909PA0010009 | $70.4 \%$ |
| 93909PA0010010 | $70.8 \%$ |

## Appendix G

## Induced Utilization Factors

Per PID guidance, the induced demand factors were calculated based on the HHS induced demand formula using the following formula: (Plan AV) ${ }^{\wedge} 2-($ Plan $A V)+1.24$.

The induced demand factors shown below are normalized to JHP's 2024 estimated membership mix by metal, averaging a 1.0 in total, and are applied to the base rate in order to develop member premiums.

| Plan Level | Induced Demand Factors <br> (Applied to Index Rate) |
| :--- | ---: |
| Bronze | 0.993 |
| Silver | 0.989 |
| Gold | 1.078 |
| Total | 1.000 |

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## Appendix H

## Rate Manual and Rate Formula

| Rates Tables / Manual |
| :--- | :--- |
| HIOS \#93909 - Jefferson Health Plans - Individual |


| Consumer Plan Adjusted Index Rate |  |
| :---: | :---: |
| HIOS ID | Factor |
| 93909PA0010005 | 286.91 |
| 93909PA0010004 | 295.52 |
| 93909PA0010003 | 301.60 |
| 93909PA0010001 | 244.04 |
| 93909PA0010002 | 224.87 |
| 93909PA0010006 | 340.17 |
| 93909PA0010007 | 321.81 |
| 93909PA0010009 | 235.17 |
| 93909PA0010010 | 247.21 |
| 93909PA0010008 | 242.23 |


| Age Factors |  |  |
| :---: | :---: | :---: |
| Age | Age Factor | Tobacco Factor |
| 0-14 | 0.765 | 1.000 |
| 15 | 0.833 | 1.000 |
| 16 | 0.859 | 1.000 |
| 17 | 0.885 | 1.000 |
| 18 | 0.913 | 1.000 |
| 19 | 0.941 | 1.000 |
| 20 | 0.970 | 1.000 |
| 21 | 1.000 | 1.100 |
| 22 | 1.000 | 1.100 |
| 23 | 1.000 | 1.100 |
| 24 | 1.000 | 1.100 |
| 25 | 1.004 | 1.100 |
| 26 | 1.024 | 1.100 |
| 27 | 1.048 | 1.100 |
| 28 | 1.087 | 1.100 |
| 29 | 1.119 | 1.100 |
| 30 | 1.135 | 1.100 |
| 31 | 1.159 | 1.100 |
| 32 | 1.183 | 1.100 |
| 33 | 1.198 | 1.100 |
| 34 | 1.214 | 1.100 |
| 35 | 1.222 | 1.100 |
| 36 | 1.230 | 1.100 |
| 37 | 1.238 | 1.100 |
| 38 | 1.246 | 1.100 |
| 39 | 1.262 | 1.100 |
| 40 | 1.278 | 1.100 |
| 41 | 1.302 | 1.100 |
| 42 | 1.325 | 1.100 |
| 43 | 1.357 | 1.100 |
| 44 | 1.397 | 1.100 |
| 45 | 1.444 | 1.100 |
| 46 | 1.500 | 1.100 |
| 47 | 1.563 | 1.100 |
| 48 | 1.635 | 1.100 |
| 49 | 1.706 | 1.100 |
| 50 | 1.786 | 1.100 |
| 51 | 1.865 | 1.100 |
| 52 | 1.952 | 1.100 |
| 53 | 2.040 | 1.100 |
| 54 | 2.135 | 1.100 |
| 55 | 2.230 | 1.100 |
| 56 | 2.333 | 1.100 |
| 57 | 2.437 | 1.100 |
| 58 | 2.548 | 1.100 |
| 59 | 2.603 | 1.100 |
| 60 | 2.714 | 1.100 |
| 61 | 2.810 | 1.100 |
| 62 | 2.873 | 1.100 |
| 63 | 2.952 | 1.100 |
| 64+ | 3.000 | 1.100 |

## Appendix H

## Rate Manual and Rate Formula

## RATE Formula:

CPAIR * Age Factor * Area Factor * Tobacco Factor
Example: 21 year old with plan 93909PA0010005 in Rating Area 8, non-smoker
$=286.9055701$ * 1.000 * 1.000000 * 1.00
= \$286.9056

Family Structure - Family rates can be determined by adding up the rates for an individual. However, when calculating the total family rate, the charge is limited to the first three children under the

## Appendix I

## Projected Reinsurance Impact

Per PID guidance, the May $17^{\text {th }}$ rate filing reflects no adjustment to claims for the reinsurance program based on the parameters outlined in Pennsylvania's 1332 waiver. We will revise this table in the July $14^{\text {th }}$ filing to reflect the updated parameter guidance from PID.

| Rating Area | Attachment <br> Point | Cap | Coinsurance | Impact to <br> Market <br> Adjusted <br> Index Rate |
| :---: | :---: | :---: | :---: | :---: |
| Rating Area 8 | $\$ 60,000$ | $\$ 100,000$ | $0 \%$ | $0.0 \%$ |

## Standard Questions

1. Membership:
a. If the projected membership for plan year 2024 significantly differs from the current 2/1/2023 membership, please explain why.

This question is not applicable as JHP is entering the market in plan year 2024.

## 2. Experience Period Claims:

a. Please confirm that all claims which are capitated have been removed from the experience period claims.

JHP is entering the market in plan year 2024 and does not have any experience period claims. Since the manual claims are based on statewide costs across all ACA individual products, we do not know the proportion of costs that were capitated vs fee for service in the base period. We believe that our base period allowed claims should capture all claims data, as reported on Worksheet 1 of the URRT. Excluding these claims would result in an artificially low allowed base rate. This methodology relies on accurate carrier reporting in the URRTs.

JHP does not have any capitation contracts in 2024, so we are not adjusting further for capitation payments in the projection period.
b. Please confirm that all non-EHB claims have been removed from the experience period claims.

JHP is entering the market in plan year 2024 and does not have any experience period claims. We confirm that all non-EHB claims have been removed from the manual claims, based on reported data within the URRT.
c. How are drug rebates projected to change from the base period to the rating period? How has this change been reflected in the rate development?

JHP is entering the market in plan year 2024 and does not have any experience. We are assuming that JHP's drug rebates will be equivalent to market levels in 2024. For that reason, no adjustment has been applied to the rate development to account for projected drug rebates.
3. COVID:
a. Please confirm that Tables 2-4 of the PAAM Exhibits do not have any COVID adjustment. Additionally, please confirm that any COVID adjustment factor in the filing is reflected in Table 5 of the PAAM Exhibits.

## [REDACTED]

b. If there is a COVID adjustment factor other than 1.0, please provide a quantitative exhibit supporting the factor.
[REDACTED]
4. Trend:
a. [SG. Only] If the Total Annual Trend in Table 3 (weighted by credibility) and the Annual Trend used to calculate quarterly rates in Table 5A differ, please provide an explanation and exhibit in support of the variation.
b. [SG. Only] In Table 5A, if cells K32:M32 are left to equal J32, please explain why that is a reasonable assumption.

This question is not applicable as JHP is only entering the individual market.
5. Table - Retention:
a. Please confirm that the federal income tax is calculated using a Federal Income Tax Rate of $21 \%$. If other adjustments were made in Table 6, cell C57, please provide a demonstration of how this number was calculated and an explanation of the other adjustments included in the calculation.

We confirm that the federal income tax is calculating using a Federal Income Tax Rate of 21\%. No other adjustments were made in Table 6, cell C57.
b. Please confirm that the Risk Adjustment User Fee PMPM is consistent with HHS Final Notice of Benefit and Payment Parameters for plan year 2024.

We confirm the Risk Adjustment User Fee PMPM is consistent with HHS Final Notice of Benefit and Payment Parameters for plan year 2024.
c. Please provide an exhibit showing the commission PMPM amount to be paid to brokers in the following situations: Open-Enrollment Enrollee - Renewing, Open Enrollment Enrollee - New, Special Enrollment Period Enrollee - New, Special Enrollment Enrollee - Renewing. If the commission PMPM is not consistent between the four options above, please provide a detailed explanation as to the reason for the difference.

## [REDACTED]

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

We confirm that the Pricing AVs were calculated using a single risk pool.
b. Please identify and support any differences between the company's metallic AV calculator results and the corresponding Pricing AVs.

The pricing AVs differ from the Federal AVC outputs primarily because the estimated allowed PMPMs used in developing pricing AVs are different than those underlying the Federal AV calculator. This is due to a leveraging effect for fixed cost sharing elements (e.g. copays, deductibles and MOOPs). The other variance is differences in the methodology of the pricing models and underlying data of the modeling. Finally, due to mandated factors, we have included a $22 \%$ load to silver on exchange plans.

## 7. Expanded Bronze Plans:

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

Per our understanding, to qualify as an expanded bronze, a plan must pay for at least one major service before the deductible is met. Both bronze plans that JHP is offering in 2024 offer one free PCP visit before cost sharing begins and cover PCP visits, specialist visits, generic drugs, and preferred brand drugs pre-deductible. Please see the Federal AV screenshots incorporated with this filing for an exhibit of this benefit coverage.
8. PAAM Exhibits - Consumer Factors:
a. Please provide quantitative and qualitative support for the proposed geographic rating area factors, if different from the previous year.

JHP is only filing in one rating area, therefore, the geographic factor is 1.0.
b. Please provide quantitative and qualitative support for the proposed network factors, if different from the previous year.

JHP does not have more than one network, therefore, the network factor is 1.0.
9. Public Health Emergency:
a. With the Public Health Emergency expected to end on May 11th, how has the rate development been affected? Please provide support for any adjustments, or support for making no adjustments, if applicable.

## [REDACTED]

b. Furthermore, with the Public Health Emergency scheduled to end on May 11th, has any adjustment been made specifically to the morbidity assumption for Plan Year 2024?

## [REDACTED]

c. Please provide commentary on how the Company believes services such as COVID vaccinations and COVID testing will be handled in PY24. Within your response please clarify if these services will be considered preventative and covered at $100 \%$.

The plan will cover COVID vaccinations and COVID testing at 100\% beginning in PY2024.

## 10. MLR Exhibit:

a. Please complete table below which summarizes the most recent three years of complete MLR information.
i. Actual is the final information which was filed for the specified calendar year
ii. Pricing is the information which was projected in the final annual filing for the given year (i.e., 2020 pricing information is from the plan year 2020 annual filing submitted in 2019)

|  | MLR | Member Months |
| :--- | :--- | :--- |


| Calendar Year | Actual | Projected | Actual | Projected |
| :---: | :---: | :---: | :---: | :---: |
| 2019 | N/A | N/A | N/A | N/A |
| 2020 | N/A | N/A | N/A | N/A |
| 2021 | N/A | N/A | N/A | N/A |

b. Are the MLRs and Member Months between Actual and Pricing comparable? If not, explain.
c. Does the insurer expect to pay MLR rebates for the 3-year period above?

These questions are not applicable as JHP is entering the market in plan year 2024.

## 11. Plan of Withdrawal:

a. Please confirm that a Plan of Withdrawal has been submitted if any plans are being discontinued.
b. For further information regarding the Plan of Withdrawal process, click here. Please send all Plan of Withdrawals to Jeffery Rohaly, wrohaly@pa.gov.

This question is not applicable as JHP is entering the market in plan year 2024.



| Month-Vear | Totat Anual Pememum | meured Claims | Completion Fatas** | Utumate Incuree clams | Members | Utimate neuree Pmpm | $\xrightarrow{\text { Estimated Anuual Coss Shaing }}$ (Member turs) | Prescripioio Dovg Rebetes* | Allowe claims (Nete of | Alowe Pmpm |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ${ }_{\text {lam-19 }}$ |  |  |  | wovol |  | Hovol |  |  |  | novol |
|  |  |  |  | movol |  | Hevol |  |  |  | movol |
| ${ }_{\text {Aper-10 }}$ |  |  |  | uovol |  | movol |  |  |  | movol |
| $\xrightarrow{\text { Jun-19 }}$ |  |  |  | Hovol |  | Hovol |  |  |  | unovol |
|  |  |  |  | ${ }_{\text {movol }}^{\text {Hovol }}$ |  |  |  |  |  |  |
| ${ }_{\text {ceat }}$ |  |  |  | novor |  | movor |  |  |  | Hovol |
| OCt-19 |  |  |  | Hovol |  | novol |  |  |  | Hovol |
| Decti9 |  |  |  | Hovol |  | Hovol |  |  |  | Hovol |
| $\xrightarrow{\text { lam-20 }}$ |  |  |  | uovvol |  | wovvol |  |  |  | wovol |
| $\underset{\substack{\text { reber20 } \\ \text { Mar-20 }}}{\text { ate }}$ |  |  |  |  |  | $\xrightarrow{\text { HoVV0! }}$ Hovol |  |  |  | movvo! |
| A0.20 |  |  |  | novvo |  | novol |  |  |  | uovol |
| Mor-20 |  |  |  | wovo! |  | uovol |  |  |  | uovol |
|  |  |  |  | novvol |  | unvol |  |  |  | Hovvol |
| $\sec _{\text {cos } 20}$ |  |  |  | novol |  | novol |  |  |  | 10! |
| $\xrightarrow{\text { Otat } 20}$ |  |  |  | wovvo |  | Hevol |  |  |  | Hovol |
| ${ }_{\text {oecc } 20}$ |  |  |  | Hovvo |  | uovvo! |  |  |  |  |
| $\underset{\substack{\text { lan-21 } \\ \text { feb-21] }}}{\text { ate }}$ |  |  |  | uovvo |  | uovol |  |  |  | movol |
|  |  |  |  | mov(0) |  | mov(0) |  |  |  | unvol |
|  |  |  |  | $\underset{\substack{\text { uovvol } \\ \text { Hovol }}}{ }$ |  | untor |  |  |  | uovo |
|  |  |  |  | Hovol |  | Hovol |  |  |  | Hovol |
|  |  |  |  | movvol |  | Hevol |  |  |  | Hovvol |
|  |  |  |  | novol |  | novol |  |  |  | uovol |
| $\xrightarrow{\text { Noor } 21}$ |  |  |  | movvol |  | movvol |  |  |  | movjol |
| - |  |  |  | movol |  | movol |  |  |  | HovVo! |
|  |  |  |  | unvol |  | uevel |  |  |  | uovo! |
|  |  |  |  | movvo |  | novvot |  |  |  | Hovvol |
| $\xrightarrow{\text { Lun-22 }}$ |  |  |  | movol |  | unvol |  |  |  | Hovol |
| ${ }_{\text {Alser }}$ |  |  |  | movot |  | (10VVI |  |  |  | wovol |
|  |  |  |  | mov(0) |  | uovvo |  |  |  | novvol |
| ${ }_{\text {Nor } 22}$ |  |  |  | Uovol |  | wovo |  |  |  | wovo |
|  |  |  |  |  |  |  |  |  |  | movol |

, imemer

Table 2b. Manual Experience Period Claims and Premiums

| Eamed Premium | Pala Caims | Ulimate Incured Caims | Member Monts | ( Estimeted Cost Sharing | Allowed Caims (Non-Capitates) | ${ }^{\text {Non-EHB Poption }}$ Cotallowed | Toat Preseripioion Dug Rebebese | Total EHB Capiation | Total Non-EHB Capitation | Estimated Risk Adjustment | Etimated densurarece Recoveres |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\frac{1}{5}$ |  |  | 4.922 .305 | 45 | $5 \quad 3.022,114,78204$ | 3,999,36631 | [1328,899,90323] |  |  |  |  |  |
| Epos Restio eriad Toat Allowed Et | Capitatio | prescripion duspebebes) |  |  |  |  |  |  |  |  |  |  |

Table 3b. Manual Trend Components


Continuance Table for Calculating Reinsurance Impact - Individual Market Only, Experience Period Information

| Carrier Name: | Jefferson Health Plans | Attachment Point: | \$60,000 |
| :---: | :---: | :---: | :---: |
| Product(s): | HMO | Reinsurance Cap: | \$100,000 |
| Market Segment: | Individual | Coinsurance Rate: | 0\% |
| Rate Effective Date: | 1/1/2024 |  |  |
| Incurred Dates: | 1/1/2022 to 12/31/2022 | Proj. Incurred Claim Impact: | 0.0\% |


| Individual ACA Compliant Policies Only: Incurred Dates 1/1/2022 to 12/31/2022 |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Annual Incurred Claims Range |  | Unique Members | Member Months | Total Incurred Claims | Total Incurred Claims with Reinsurance |
| \$0 | \$29,999 |  |  |  |  |
| \$30,000 | \$34,999 |  |  |  |  |
| \$35,000 | \$39,999 |  |  |  |  |
| \$40,000 | \$44,999 |  |  |  |  |
| \$45,000 | \$49,999 |  |  |  |  |
| \$50,000 | \$54,999 |  |  |  |  |
| \$55,000 | \$59,999 |  |  |  |  |
| \$60,000 | \$64,999 |  |  |  |  |
| \$65,000 | \$69,999 |  |  |  |  |
| \$70,000 | \$74,999 |  |  |  |  |
| \$75,000 | \$79,999 |  |  |  |  |
| \$80,000 | \$84,999 |  |  |  |  |
| \$85,000 | \$89,999 |  |  |  |  |
| \$90,000 | \$94,999 |  |  |  |  |
| \$95,000 | \$99,999 |  |  |  |  |
| \$100,000 | \$109,999 |  |  |  |  |
| \$110,000 | \$119,999 |  |  |  |  |
| \$120,000 | \$129,999 |  |  |  |  |
| \$130,000 | \$139,999 |  |  |  |  |
| \$140,000 | \$149,999 |  |  |  |  |
| \$150,000 | \$159,999 |  |  |  |  |
| \$160,000 | \$169,999 |  |  |  |  |
| \$170,000 | \$179,999 |  |  |  |  |
| \$180,000 | \$189,999 |  |  |  |  |
| \$190,000 | \$199,999 |  |  |  |  |
| \$200,000 | \$209,999 |  |  |  |  |
| \$210,000 | \$219,999 |  |  |  |  |
| \$220,000 | \$229,999 |  |  |  |  |
| \$230,000 | \$239,999 |  |  |  |  |
| \$240,000 | \$249,999 |  |  |  |  |
| \$250,000 | \$259,999 |  |  |  |  |
| \$260,000 | \$269,999 |  |  |  |  |
| \$270,000 | \$279,999 |  |  |  |  |
| \$280,000 | \$289,999 |  |  |  |  |
| \$290,000 | \$299,999 |  |  |  |  |
| \$300,000 | \$324,999 |  |  |  |  |
| \$325,000 | \$349,999 |  |  |  |  |
| \$350,000 | \$374,999 |  |  |  |  |
| \$375,000 | \$399,999 |  |  |  |  |
| \$400,000 | \$424,999 |  |  |  |  |
| \$425,000 | \$449,999 |  |  |  |  |
| \$450,000 | \$474,999 |  |  |  |  |
| \$475,000 | \$499,999 |  |  |  |  |
| \$500,000 | \$599,999 |  |  |  |  |
| \$600,000 | \$699,999 |  |  |  |  |
| \$700,000 | \$799,999 |  |  |  |  |
| \$800,000 | \$899,999 |  |  |  |  |
| \$900,000 | \$999,999 |  |  |  |  |
| \$1,000,000+ |  |  |  |  |  |
| Total |  |  |  |  |  |

Continuance Table for Calculating Reinsurance Impact - Individual Market Only, Projection Period Information

| Carrier Name: | Jefferson Health Plans |
| :--- | :--- |
| Product(s): | HMO |
| Market Segment: | Individual |
| Rate Effective Date: | $1 / 1 / 2024$ |


| Attachment Point: | $\$ 60,000$ |
| :--- | ---: |
| Reinsurance Cap: | $\$ 100,000$ |
| Coinsurance Rate: | $0 \%$ |

$00.0 \%$
Proj. Morbidity Impact:
0.0\%
0.0\%

| Reinsurance Program Impact Continuance Table Development - Plan Year 2024 |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Annual Incurred Claims Range |  | Unique Members | Member Months | Total Incurred Claims | Total Incurred Claims with Reinsurance |
| \$0 | \$29,999 |  |  |  |  |
| \$30,000 | \$34,999 |  |  |  |  |
| \$35,000 | \$39,999 |  |  |  |  |
| \$40,000 | \$44,999 |  |  |  |  |
| \$45,000 | \$49,999 |  |  |  |  |
| \$50,000 | \$54,999 |  |  |  |  |
| \$55,000 | \$59,999 |  |  |  |  |
| \$60,000 | \$64,999 |  |  |  |  |
| \$65,000 | \$69,999 |  |  |  |  |
| \$70,000 | \$74,999 |  |  |  |  |
| \$75,000 | \$79,999 |  |  |  |  |
| \$80,000 | \$84,999 |  |  |  |  |
| \$85,000 | \$89,999 |  |  |  |  |
| \$90,000 | \$94,999 |  |  |  |  |
| \$95,000 | \$99,999 |  |  |  |  |
| \$100,000 | \$109,999 |  |  |  |  |
| \$110,000 | \$119,999 |  |  |  |  |
| \$120,000 | \$129,999 |  |  |  |  |
| \$130,000 | \$139,999 |  |  |  |  |
| \$140,000 | \$149,999 |  |  |  |  |
| \$150,000 | \$159,999 |  |  |  |  |
| \$160,000 | \$169,999 |  |  |  |  |
| \$170,000 | \$179,999 |  |  |  |  |
| \$180,000 | \$189,999 |  |  |  |  |
| \$190,000 | \$199,999 |  |  |  |  |
| \$200,000 | \$209,999 |  |  |  |  |
| \$210,000 | \$219,999 |  |  |  |  |
| \$220,000 | \$229,999 |  |  |  |  |
| \$230,000 | \$239,999 |  |  |  |  |
| \$240,000 | \$249,999 |  |  |  |  |
| \$250,000 | \$259,999 |  |  |  |  |
| \$260,000 | \$269,999 |  |  |  |  |
| \$270,000 | \$279,999 |  |  |  |  |
| \$280,000 | \$289,999 |  |  |  |  |
| \$290,000 | \$299,999 |  |  |  |  |
| \$300,000 | \$324,999 |  |  |  |  |
| \$325,000 | \$349,999 |  |  |  |  |
| \$350,000 | \$374,999 |  |  |  |  |
| \$375,000 | \$399,999 |  |  |  |  |
| \$400,000 | \$424,999 |  |  |  |  |
| \$425,000 | \$449,999 |  |  |  |  |
| \$450,000 | \$474,999 |  |  |  |  |
| \$475,000 | \$499,999 |  |  |  |  |
| \$500,000 | \$599,999 |  |  |  |  |
| \$600,000 | \$699,999 |  |  |  |  |
| \$700,000 | \$799,999 |  |  |  |  |
| \$800,000 | \$899,999 |  |  |  |  |
| \$900,000 | \$999,999 |  |  |  |  |
| \$1,000,000+ |  |  |  |  |  |
| Total |  |  |  |  |  |

## PA Rate Template Part II Rate Development and Change



Table 6 . Retention


|  | ${ }^{203}$ novol | sovel | Sitaene | Pecemememe |
| :---: | :---: | :---: | :---: | :---: |
|  | nown |  | Sex | movel |
| , |  |  |  |  |
|  |  | cos |  |  |
|  | mown |  |  |  |
|  | fove | 77 |  | and |
| Da. sumatid smomorover | Soma | ${ }^{3278}$ | coly | 边 |
|  |  |  | anvo |  |
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|  | mex | ${ }^{182129]}$ |  | comen |
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|  |  |  |  | (en |
| moses muscatauaskems |  |  | . | ovor |
|  | nown | sover | mownel | nowe |





## PA Rate Quarterly Template Part V

 Consumer FactorsTable 12. Age and Tobacco Factors

| Projection Period Age and Tobacco Factors |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Age Band | Age Factor | Tobacco Factor | Age Band | Age Factor | Tobacco Factor |
| 0-14 | 0.765 |  | 40 | 1.278 | 1.100 |
| 15 | 0.833 |  | 41 | 1.302 | 1.100 |
| 16 | 0.859 |  | 42 | 1.325 | 1.100 |
| 17 | 0.885 |  | 43 | 1.357 | 1.100 |
| 18 | 0.913 |  | 44 | 1.397 | 1.100 |
| 19 | 0.941 |  | 45 | 1.444 | 1.100 |
| 20 | 0.970 |  | 46 | 1.500 | 1.100 |
| 21 | 1.000 | 1.100 | 47 | 1.563 | 1.100 |
| 22 | 1.000 | 1.100 | 48 | 1.635 | 1.100 |
| 23 | 1.000 | 1.100 | 49 | 1.706 | 1.100 |
| 24 | 1.000 | 1.100 | 50 | 1.786 | 1.100 |
| 25 | 1.004 | 1.100 | 51 | 1.865 | 1.100 |
| 26 | 1.024 | 1.100 | 52 | 1.952 | 1.100 |
| 27 | 1.048 | 1.100 | 53 | 2.040 | 1.100 |
| 28 | 1.087 | 1.100 | 54 | 2.135 | 1.100 |
| 29 | 1.119 | 1.100 | 55 | 2.230 | 1.100 |
| 30 | 1.135 | 1.100 | 56 | 2.333 | 1.100 |
| 31 | 1.159 | 1.100 | 57 | 2.437 | 1.100 |
| 32 | 1.183 | 1.100 | 58 | 2.548 | 1.100 |
| 33 | 1.198 | 1.100 | 59 | 2.603 | 1.100 |
| 34 | 1.214 | 1.100 | 60 | 2.714 | 1.100 |
| 35 | 1.222 | 1.100 | 61 | 2.810 | 1.100 |
| 36 | 1.230 | 1.100 | 62 | 2.873 | 1.100 |
| 37 | 1.238 | 1.100 | 63 | 2.952 | 1.100 |
| 38 | 1.246 | 1.100 | 64+ | 3.000 | 1.100 |
| 39 | 1.262 | 1.100 |  |  |  |


| Carrier Name: | Jefferson Health Plans |
| :--- | :--- |
| Product(s): | HMO |
| Market Segment: | Individual |
| Rate Effective Date: | $\mathbf{1 / 1 / 2 0 2 4}$ |

Table 13. Geographic Factors

| Geographic Area Factors |  |  |  |
| :--- | :--- | :--- | :---: |
| Area | Counties | Current <br> Factor | Proposed <br> Factor |
| Rating Area 1 |  |  |  |
| Rating Area 2 |  |  |  |
| Rating Area 3 |  |  |  |
| Rating Area 4 |  |  |  |
| Rating Area 5 |  |  |  |
| Rating Area 6 |  |  |  |
| Rating Area 7 |  | 0.000 | 1.000 |
| Rating Area 8 | Philadelphia, Bucks, Montgomery |  |  |
| Rating Area 9 |  |  |  |

Table 14. Network Factors

| Projection Period Network Factors |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Network Name | Rating Area | Current <br> Factor | Proposed <br> Factor | Approval <br> Date |  |  |
|  | Retwork 1 | 0.000 | 1.000 |  |  |  |
|  | Rating Area 8 |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

PA Rate Template Part VI - Rate Change Summary

| Overview <br> Intital Requested Average Rate Change: | \#OVV0! |  |
| :---: | :---: | :---: |
|  |  |  |
| Minimum Requested Rate Change: |  |  |
| Maximum Requested Rate Change: |  |  |
| Mapped Members: |  |  |


| Key Information |  |  |
| :---: | :---: | :---: |
|  |  |  |
|  |  |  |
| Claims |  |  |
| Administrative Expenses |  |  |
| Company Made After Taxes s |  |  |
| The company expects its annual medical cos | oincrease: | 0.00\% |



How It Plans to Spend Your Premium




Jefferson Health Plans
Individual
Plan Design Summary

| HIOS Plan ID | Plan Marketing Name | Product | Metal | $\begin{gathered} \text { On/Off } \\ \text { Exchange } \end{gathered}$ | Network | Rating Area | Counties Covered |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 93909PA0010005 93909PA0010004 93909PA0010003 93909PA0010001 93909PA0010002 93909PA0010006 93909PA0010007 93909PA0010009 93909PA0010010 93909PA0010008 | Jefferson Total Silver On Exchange Jefferson Balanced Silver On Exchange Jefferson \$0 Deductible Silver On Exchange Jefferson \$0 Deductible Bronze On Exchange Jefferson Total Bronze On Exchange Jefferson \$0 Gold On Exchange Jefferson Total Gold On Exchange Jefferson Balanced Silver Off Exchange Jefferson Total Silver Off Exchange Jefferson \$0 Deductible Silver Off Exchange | $\begin{aligned} & \hline \text { HMO } \\ & \text { HMO } \\ & \text { HMO } \\ & \text { HMO } \\ & \text { HMO } \\ & \text { HMO } \\ & \text { HMO } \\ & \text { HMO } \\ & \text { HMO } \\ & \text { HMO } \end{aligned}$ | Silver Silver Silver Bronze Bronze Gold Gold Silver Silver Silver | On On On On/Off On/Off On/Off On/Off Off Off Off | Jefferson He Jefferson He Jefferson He Jefferson He Jefferson He Jefferson He Jefferson He Jefferson He Jefferson He Jefferson He | Rating Area 8 Rating Area 8 Rating Area 8 Rating Area 8 Rating Area 8 Rating Area 8 Rating Area 8 Rating Area 8 Rating Area 8 Rating Area 8 | Philadelphia, Montgomery, Bucks Philadelphia, Montgomery, Bucks Philadelphia, Montgomery, Bucks Philadelphia, Montgomery, Bucks Philadelphia, Montgomery, Bucks Philadelphia, Montgomery, Bucks Philadelphia, Montgomery, Bucks Philadelphia, Montgomery, Bucks Philadelphia, Montgomery, Bucks Philadelphia, Montgomery, Bucks |

## Issuer: Jefferson Health Plans Market: Individual



[^0]
## Unified Rate Review v6.0

Company Legal Name:
HIOS Issuer ID:

Defterson Heath Plans | 93909 |  |
| :--- | :--- | :--- |
| $1 / 1 / 2024$ | State: |
| Market: |  |

To add a product to Worssheet 2 - Plan Product Info, select the Add Product button or Crtrl Shift + To add a plan to Worksheet 2 - Plan Product IIfo, select the Add Plan button or Ctrl 1 Shift $+L$. To validate, slect the validate button or ctrt 1 shift +1 .
To finalize, select the Finalize button or Ctrl + Shift + F.

Market Level Calculations (Same for all Plans)

| Section: Experience Period daat |  | to 12/31/2022 |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | 2 |  |  |  |
| Allowed Claims |  | 50.00 |  | Holv/ |
| Reinsurance |  | 50.00 |  | Hov/ |
| Incurred Claims in Experience Period |  | 50.00 |  | \#DIV/9 |
| Risk Adiustment |  | S0.00 |  | Hov/0 |
| Experience Period Premium |  | 50.00 |  | Hiv |
| derence Period Member Month |  |  |  |  |


| Benefit Category | Experience Period IndexRate PMPM | Year 1 1 rend |  | Year 2 Trend |  | Trended EHB Allowed Claims PMPM |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | cost | Utilization | cost | Utilization |  |
| Innatient Hospital <br> Outpatient otapital <br> Professional <br> Other Medical <br> Capitation <br> Prescription Drug <br> Total | 50.00 | 1.000 | 1.000 | 1.000 | 1.000 | 50.00 |
|  | 50.00 | 1.000 | 1.000 | 1.000 | 1.000 | 50.00 |
|  | 50.00 | 1.000 | 1.000 | 1.000 | 1.000 | $\stackrel{50.00}{5}$ |
|  | 50.00 | 1.000 | 1.000 | 1.000 | 1.000 |  |
|  | 50.00 500 | 1.000 | 1.000 | 1.000 | ${ }^{1.000}$ | 50.00 |
|  | 50.00 | 1.000 | 1.000 | 1.000 | 1.000 | 50.00 |
|  | 50.00 |  |  |  |  | 50.00 |
| Morbiditit Adjustment |  |  |  | 1.000 |  |  |
|  |  |  |  | 1.000 |  |  |
|  |  |  |  | 1.000 |  |  |
| Other |  |  |  | 1.000 |  |  |
| Adjusted Trended EHB Allowe Claims PMPM for 1/1/2024 |  |  |  | 50.00 |  |  |
| Manual EHB Allowed Claims PMPM Applied Credibility \% |  |  |  | 55050.05 |  |  |
|  |  |  |  | 0.00\% |  |  |
| Projected Period Totals |  |  |  |  |  |  |
|  |  |  |  | ${ }_{5505.05}$ | ${ }_{518,181,800000}$ |  |
| Reinsurance ${ }_{\text {Risken }}$ |  |  |  | 50.00 56.65 | -52.471.400.00 |  |
| Exchange User Fees |  |  |  | 2.40\% |  |  |
|  |  |  |  | ${ }_{5587.81}$ | ${ }_{\text {221,161,065.57 }}$ |  |
| Projected Member Months |  |  |  | 36,000 |  |  |

Information Noo Releasable to the Public Unless Authorized by Law: This nitormation has not been publically disclosed and may be priviegee and confidential It it sor initermal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the ifformation. Unauthorized disclosure may result in prosecution to the full extent of the law.

## Compana Legal Name: Hos ssuerli:







## oduct/Pan tevel Catuations




| ${ }^{\text {4, }}$ S Peanil (Standarar | Total | 3309Pa001000 |  |  |  |  |  |  | , |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 4.2 Allowe Claims | 518.181 .858 | $53,120,063$ | 53,13,604 | 52,720045 | 52435,741 | 52,00,744 | 554.544 | S1.60, 535 | 5884.400 | S779,766 | ${ }_{5675385}$ |
| 4.3 Reinsurarce |  |  |  |  |  |  |  |  |  |  |  |
| $\frac{4.4 \text { Member Cois Sharing }}{45 \text { cous }}$ | 47,378 | 2.332 | 46,211 | ${ }_{52428,588}^{50}$ | ${ }_{5847,3,32}^{512}$ | ${ }_{5956,822}$ | S83,266 | 1,264 | S\% | 5280.668 | S222.09 |
| $\frac{4.5 \text { Cos sharing Reouction }}{46 \text { numured }}$ |  |  | 23 | 388 | - ${ }_{\text {S }}^{51}$ | 5 | 18 |  | S0 | 50 | 29 |
|  |  | S. 3322.967 | S. 5 S32, 2,97 | S. 527 7, 8,22 | S. 5251,139 | ${ }_{\text {S }}^{\text {S251, } 139}$ | ${ }_{\text {S } 5 \text { S51,158 }}$ | ${ }_{\text {S. } 5153,474}$ | ${ }_{\text {c. } 560,76}$ | . 580.716 |  |
| 4.8 preaium | S18,091,788 | S3,275,633 | 53,33,929 | S2,951,342 | S2, $16,5,53$ | S1,969378 | $55^{615,173}$ | S1,745909 | S69,1,58 | S67,0,05 | 5604,60 |
| 4.9 Proisted $M$ |  |  | ${ }_{\text {c, }}^{6.2590}$ | 8500\% |  | ${ }^{82} 7788$ | ${ }^{81.69 \%}$ | ${ }_{\text {cki.59\% }}^{2.950}$ |  | ${ }_{\text {84,5s\% }}^{1.65}$ |  |
| Per Member Per |  |  |  |  |  |  |  |  |  |  |  |
| 4.12 Alowed Caims | ${ }_{5050.05}^{50.00}$ |  | ${ }_{550218}^{50.00}$ | ${ }_{5}^{5504.40}$ | ${ }_{5001.18}^{50.00}$ | ${ }_{\text {cisa3.99, }}^{50.00}$ | S550.04 | ${ }_{5}^{5388.90}$ | ${ }_{\text {S502, }}^{50} 5$ | ${ }_{\text {S4992, }}^{51}$ | 5504 |
| 4.15 | ${ }_{\substack{51200 \\ 5126}}$ | 5000 59802 | ¢88739 | ¢8002 | Stives | ${ }_{519688}$ | ${ }_{58,67}$ | $\xrightarrow{\text { S10014 }}$ | 517 | S179,69 | ${ }_{\text {S165, }}^{51}$ |
| 4.14 Cost Sharing Reduction | S000 | s000 | so.00 | so.00 | 50.00 | 50.00 | 50.0 | 50.00 | s0.00 | s000 |  |
| ${ }^{4.15}$ Incurrec Caims | ${ }_{\text {S738,74 }}$ | ${ }_{580119}$ | ${ }_{541478}$ | ${ }_{542488}$ | ${ }_{532684}$ | S297.11 | ${ }_{\text {S4653] }}$ | ${ }_{\text {S437.46 }}$ | 8330.67 | S319.3) |  |
|  |  |  | c. 5 S51.67 |  | ¢ 5 S54.67 |  | ciss.67 |  | [is5167 | ¢ |  |

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.

| REQUESTED RATE CHANGE INFORMATION |  |
| :---: | :---: |
| Change Period: | 1/1/2024-12/31/2024 |
| Projected Period Covered Lives: | 3,000 |
| \% Rate change requested - Min\%, Max\%, Weighted Avg\% | BELOW <--- only applied this to in-force premiums |
| Min: | N/A |
| Max: | N/A |
| Wtd Avg: | N/A |
| Written Premium Change: | N/A |
| PRIOR RATE: |  |
| Total Earned Premium | N/A |
| Total Incurred Claims | N/A |
| Annualized PMPM - \$ Min, \$ Max, \$Weighted Avg |  |
| Min: | N/A |
| Max: | N/A |
| Wtd Avg: | N/A |
| REQUESTED RATE |  |
| Projected Earned Premium | \$18,091,708 << matches URRT WS2 |
| Projected Incurred Claims | \$15,494,769 |
| Annualized PMPM - \$ Min, \$ Max, \$Weighted Avg. | BELOW |
| Min: | \$172.03 << 93909PA0010002, Rating Area 8, Age 0-14, Non-Smoker |
| Max: | \$1,122.55 << 93909PA0010006, Rating Area 8, Age 64 and Older, Smoker |
| Wtd Avg: | \$502.55 << Smoker and non-smoker average premium |



93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010005 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User obacco UserNon-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User保 obacco UserNon-Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use

| 44 | 400.81 | 440.89 |
| :---: | :---: | :---: |
| 45 | 414.29 | 455.72 |
| 46 | 430.36 | 473.40 |
| 47 | 448.43 | 493.27 |
| 48 | 469.09 | 516.00 |
| 49 | 489.46 | 538.41 |
| 50 | 512.41 | 563.65 |
| 51 | 535.08 | 588.59 |
| 52 | 560.04 | 616.04 |
| 53 | 585.29 | 643.82 |
| 54 | 612.54 | 673.79 |
| 55 | 639.80 | 703.78 |
| 56 | 669.35 | 736.29 |
| 57 | 699.19 | 769.11 |
| 58 | 731.04 | 804.14 |
| 59 | 746.82 | 821.50 |
| 60 | 778.66 | 856.53 |
| 61 | 806.20 | 886.82 |
| 62 | 824.28 | 906.71 |
| 63 | 846.95 | 931.65 |
| 64 and over | 860.72 | 946.79 |
| 0-14 | 226.07 | 226.07 |
| 15 | 246.17 | 246.17 |
| 16 | 253.85 | 253.85 |
| 17 | 261.53 | 261.53 |
| 18 | 269.81 | 269.81 |
| 19 | 278.08 | 278.08 |
| 20 | 286.65 | 286.65 |
| 21 | 295.52 | 325.07 |
| 22 | 295.52 | 325.07 |
| 23 | 295.52 | 325.07 |
| 24 | 295.52 | 325.07 |
| 25 | 296.70 | 326.37 |
| 26 | 302.61 | 332.87 |
| 27 | 309.70 | 340.67 |
| 28 | 321.23 | 353.35 |
| 29 | 330.68 | 363.75 |
| 30 | 335.41 | 368.95 |
| 31 | 342.51 | 376.76 |
| 32 | 349.60 | 384.56 |
| 33 | 354.03 | 389.43 |
| 34 | 358.76 | 394.64 |
| 35 | 361.12 | 397.23 |
| 36 | 363.49 | 399.84 |
| 37 | 365.85 | 402.44 |
| 38 | 368.22 | 405.04 |
| 39 | 372.94 | 410.23 |
| 40 | 377.67 | 415.44 |
| 41 | 384.76 | 423.24 |

93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010004 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobaco User No Tobacco User obacco UserNon-Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco Us Nobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco User Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User obacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User

| 42 | 391.56 | 430.72 |
| :---: | :---: | :---: |
| 43 | 401.02 | 441.12 |
| 44 | 412.84 | 454.12 |
| 45 | 426.73 | 469.40 |
| 46 | 443.28 | 487.61 |
| 47 | 461.89 | 508.08 |
| 48 | 483.17 | 531.49 |
| 49 | 504.15 | 554.57 |
| 50 | 527.79 | 580.57 |
| 51 | 551.14 | 606.25 |
| 52 | 576.85 | 634.54 |
| 53 | 602.86 | 663.15 |
| 54 | 630.93 | 694.02 |
| 55 | 659.00 | 724.90 |
| 56 | 689.44 | 758.38 |
| 57 | 720.18 | 792.20 |
| 58 | 752.98 | 828.28 |
| 59 | 769.23 | 846.15 |
| 60 | 802.04 | 882.24 |
| 61 | 830.40 | 913.44 |
| 62 | 849.02 | 933.92 |
| 63 | 872.37 | 959.61 |
| 64 and over | 886.55 | 975.21 |
| 0-14 | 230.72 | 230.72 |
| 15 | 251.23 | 251.23 |
| 16 | 259.07 | 259.07 |
| 17 | 266.91 | 266.91 |
| 18 | 275.36 | 275.36 |
| 19 | 283.80 | 283.80 |
| 20 | 292.55 | 292.55 |
| 21 | 301.60 | 331.76 |
| 22 | 301.60 | 331.76 |
| 23 | 301.60 | 331.76 |
| 24 | 301.60 | 331.76 |
| 25 | 302.80 | 333.08 |
| 26 | 308.83 | 339.71 |
| 27 | 316.07 | 347.68 |
| 28 | 327.83 | 360.61 |
| 29 | 337.49 | 371.24 |
| 30 | 342.31 | 376.54 |
| 31 | 349.55 | 384.51 |
| 32 | 356.79 | 392.47 |
| 33 | 361.31 | 397.44 |
| 34 | 366.14 | 402.75 |
| 35 | 368.55 | 405.41 |
| 36 | 370.96 | 408.06 |
| 37 | 373.38 | 410.72 |
| 38 | 375.79 | 413.37 |
| 39 | 380.61 | 418.67 |

93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 93909PA0010003 Rating Area 8 3909PA0010003 Ratin Area 93900PA0010001 Rating Area 8 93900PA0010001 Rating Area 8 33909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User保 obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use

| 40 | 385.44 | 423.98 |
| :---: | :---: | :---: |
| 41 | 392.68 | 431.95 |
| 42 | 399.61 | 439.57 |
| 43 | 409.27 | 450.20 |
| 44 | 421.33 | 463.46 |
| 45 | 435.50 | 479.05 |
| 46 | 452.39 | 497.63 |
| 47 | 471.39 | 518.53 |
| 48 | 493.11 | 542.42 |
| 49 | 514.52 | 565.97 |
| 50 | 538.65 | 592.52 |
| 51 | 562.48 | 618.73 |
| 52 | 588.72 | 647.59 |
| 53 | 615.26 | 676.79 |
| 54 | 643.91 | 708.30 |
| 55 | 672.56 | 739.82 |
| 56 | 703.62 | 773.98 |
| 57 | 734.99 | 808.49 |
| 58 | 768.47 | 845.32 |
| 59 | 785.05 | 863.56 |
| 60 | 818.53 | 900.38 |
| 61 | 847.48 | 932.23 |
| 62 | 866.49 | 953.14 |
| 63 | 890.31 | 979.34 |
| 64 and over | 904.79 | 995.27 |
| 0-14 | 186.69 | 186.69 |
| 15 | 203.28 | 203.28 |
| 16 | 209.63 | 209.63 |
| 17 | 215.97 | 215.97 |
| 18 | 222.81 | 222.81 |
| 19 | 229.64 | 229.64 |
| 20 | 236.72 | 236.72 |
| 21 | 244.04 | 268.44 |
| 22 | 244.04 | 268.44 |
| 23 | 244.04 | 268.44 |
| 24 | 244.04 | 268.44 |
| 25 | 245.01 | 269.51 |
| 26 | 249.89 | 274.88 |
| 27 | 255.75 | 281.33 |
| 28 | 265.27 | 291.80 |
| 29 | 273.08 | 300.39 |
| 30 | 276.98 | 304.68 |
| 31 | 282.84 | 311.12 |
| 32 | 288.70 | 317.57 |
| 33 | 292.36 | 321.60 |
| 34 | 296.26 | 325.89 |
| 35 | 298.21 | 328.03 |
| 36 | 300.17 | 330.19 |
| 37 | 302.12 | 332.33 |

93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010001 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco Un-Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco UsiNobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use obacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobaco User Nob obacco User/Non-Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Us

| 38 | 304.07 | 334.48 |
| :---: | :---: | :---: |
| 39 | 307.98 | 338.78 |
| 40 | 311.88 | 343.07 |
| 41 | 317.74 | 349.51 |
| 42 | 323.35 | 355.69 |
| 43 | 331.16 | 364.28 |
| 44 | 340.92 | 375.01 |
| 45 | 352.39 | 387.63 |
| 46 | 366.06 | 402.67 |
| 47 | 381.43 | 419.57 |
| 48 | 399.00 | 438.90 |
| 49 | 416.33 | 457.96 |
| 50 | 435.85 | 479.44 |
| 51 | 455.13 | 500.64 |
| 52 | 476.36 | 524.00 |
| 53 | 497.84 | 547.62 |
| 54 | 521.02 | 573.12 |
| 55 | 544.20 | 598.62 |
| 56 | 569.34 | 626.27 |
| 57 | 594.72 | 654.19 |
| 58 | 621.81 | 683.99 |
| 59 | 635.23 | 698.75 |
| 60 | 662.32 | 728.55 |
| 61 | 685.75 | 754.33 |
| 62 | 701.12 | 771.23 |
| 63 | 720.40 | 792.44 |
| 64 and over | 732.11 | 805.32 |
| 0-14 | 172.03 | 172.03 |
| 15 | 187.32 | 187.32 |
| 16 | 193.16 | 193.16 |
| 17 | 199.01 | 199.01 |
| 18 | 205.31 | 205.31 |
| 19 | 211.60 | 211.60 |
| 20 | 218.13 | 218.13 |
| 21 | 224.87 | 247.36 |
| 22 | 224.87 | 247.36 |
| 23 | 224.87 | 247.36 |
| 24 | 224.87 | 247.36 |
| 25 | 225.77 | 248.35 |
| 26 | 230.27 | 253.30 |
| 27 | 235.67 | 259.24 |
| 28 | 244.44 | 268.88 |
| 29 | 251.63 | 276.79 |
| 30 | 255.23 | 280.75 |
| 31 | 260.63 | 286.69 |
| 32 | 266.02 | 292.62 |
| 33 | 269.40 | 296.34 |
| 34 | 272.99 | 300.29 |
| 35 | 274.79 | 302.27 |

93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010002 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobaco UserNo Tobacco User Tobacco UserNon-Tobacco User obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco Us Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco Use Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco Use Nob obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use

| 36 | 276.59 | 304.25 |
| :---: | :---: | :---: |
| 37 | 278.39 | 306.23 |
| 38 | 280.19 | 308.21 |
| 39 | 283.79 | 312.17 |
| 40 | 287.39 | 316.13 |
| 41 | 292.78 | 322.06 |
| 42 | 297.95 | 327.75 |
| 43 | 305.15 | 335.67 |
| 44 | 314.15 | 345.57 |
| 45 | 324.71 | 357.18 |
| 46 | 337.31 | 371.04 |
| 47 | 351.47 | 386.62 |
| 48 | 367.66 | 404.43 |
| 49 | 383.63 | 421.99 |
| 50 | 401.62 | 441.78 |
| 51 | 419.39 | 461.33 |
| 52 | 438.95 | 482.85 |
| 53 | 458.74 | 504.61 |
| 54 | 480.10 | 528.11 |
| 55 | 501.46 | 551.61 |
| 56 | 524.62 | 577.08 |
| 57 | 548.01 | 602.81 |
| 58 | 572.97 | 630.27 |
| 59 | 585.34 | 643.87 |
| 60 | 610.30 | 671.33 |
| 61 | 631.89 | 695.08 |
| 62 | 646.06 | 710.67 |
| 63 | 663.82 | 730.20 |
| 64 and over | 674.61 | 742.07 |
| 0-14 | 260.23 | 260.23 |
| 15 | 283.36 | 283.36 |
| 16 | 292.20 | 292.20 |
| 17 | 301.05 | 301.05 |
| 18 | 310.57 | 310.57 |
| 19 | 320.10 | 320.10 |
| 20 | 329.96 | 329.96 |
| 21 | 340.17 | 374.19 |
| 22 | 340.17 | 374.19 |
| 23 | 340.17 | 374.19 |
| 24 | 340.17 | 374.19 |
| 25 | 341.53 | 375.68 |
| 26 | 348.33 | 383.16 |
| 27 | 356.49 | 392.14 |
| 28 | 369.76 | 406.74 |
| 29 | 380.64 | 418.70 |
| 30 | 386.09 | 424.70 |
| 31 | 394.25 | 433.68 |
| 32 | 402.42 | 442.66 |
| 33 | 407.52 | 448.27 |

93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010006 Rating Area 8 93909PA0010007 Rating Area 8 33909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco UserNon-Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco UserNon-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco UserNon-Tobacco User obacco User/Non-Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User

| 34 | 412.96 | 454.26 |
| :---: | :---: | :---: |
| 35 | 415.68 | 457.25 |
| 36 | 418.40 | 460.24 |
| 37 | 421.12 | 463.23 |
| 38 | 423.85 | 466.24 |
| 39 | 429.29 | 472.22 |
| 40 | 434.73 | 478.20 |
| 41 | 442.89 | 487.18 |
| 42 | 450.72 | 495.79 |
| 43 | 461.60 | 507.76 |
| 44 | 475.21 | 522.73 |
| 45 | 491.20 | 540.32 |
| 46 | 510.25 | 561.28 |
| 47 | 531.68 | 584.85 |
| 48 | 556.17 | 611.79 |
| 49 | 580.32 | 638.35 |
| 50 | 607.53 | 668.28 |
| 51 | 634.41 | 697.85 |
| 52 | 664.00 | 730.40 |
| 53 | 693.94 | 763.33 |
| 54 | 726.25 | 798.88 |
| 55 | 758.57 | 834.43 |
| 56 | 793.61 | 872.97 |
| 57 | 828.98 | 911.88 |
| 58 | 866.74 | 953.41 |
| 59 | 885.45 | 974.00 |
| 60 | 923.21 | 1015.53 |
| 61 | 955.86 | 1051.45 |
| 62 | 977.29 | 1075.02 |
| 63 | 1004.17 | 1104.59 |
| 64 and over | 1020.50 | 1122.55 |
| 0-14 | 246.18 | 246.18 |
| 15 | 268.06 | 268.06 |
| 16 | 276.43 | 276.43 |
| 17 | 284.80 | 284.80 |
| 18 | 293.81 | 293.81 |
| 19 | 302.82 | 302.82 |
| 20 | 312.15 | 312.15 |
| 21 | 321.81 | 353.99 |
| 22 | 321.81 | 353.99 |
| 23 | 321.81 | 353.99 |
| 24 | 321.81 | 353.99 |
| 25 | 323.09 | 355.40 |
| 26 | 329.53 | 362.48 |
| 27 | 337.25 | 370.98 |
| 28 | 349.80 | 384.78 |
| 29 | 360.10 | 396.11 |
| 30 | 365.25 | 401.78 |
| 31 | 372.97 | 410.27 |

93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010007 Rating Area 8 93909PA0010009 Rating Area 8 3909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco Us Nobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco User/No-Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use

| 32 | 380.70 | 418.77 |
| :---: | :---: | :---: |
| 33 | 385.52 | 424.07 |
| 34 | 390.67 | 429.74 |
| 35 | 393.25 | 432.58 |
| 36 | 395.82 | 435.40 |
| 37 | 398.39 | 438.23 |
| 38 | 400.97 | 441.07 |
| 39 | 406.12 | 446.73 |
| 40 | 411.27 | 452.40 |
| 41 | 418.99 | 460.89 |
| 42 | 426.39 | 469.03 |
| 43 | 436.69 | 480.36 |
| 44 | 449.56 | 494.52 |
| 45 | 464.69 | 511.16 |
| 46 | 482.71 | 530.98 |
| 47 | 502.98 | 553.28 |
| 48 | 526.15 | 578.77 |
| 49 | 549.00 | 603.90 |
| 50 | 574.74 | 632.21 |
| 51 | 600.17 | 660.19 |
| 52 | 628.16 | 690.98 |
| 53 | 656.48 | 722.13 |
| 54 | 687.05 | 755.76 |
| 55 | 717.63 | 789.39 |
| 56 | 750.77 | 825.85 |
| 57 | 784.24 | 862.66 |
| 58 | 819.96 | 901.96 |
| 59 | 837.66 | 921.43 |
| 60 | 873.38 | 960.72 |
| 61 | 904.27 | 994.70 |
| 62 | 924.55 | 1017.01 |
| 63 | 949.97 | 1044.97 |
| 64 and over | 965.42 | 1061.96 |
| 0-14 | 185.30 | 185.30 |
| 15 | 201.78 | 201.78 |
| 16 | 208.07 | 208.07 |
| 17 | 214.37 | 214.37 |
| 18 | 221.15 | 221.15 |
| 19 | 227.94 | 227.94 |
| 20 | 234.96 | 234.96 |
| 21 | 242.23 | 266.45 |
| 22 | 242.23 | 266.45 |
| 23 | 242.23 | 266.45 |
| 24 | 242.23 | 266.45 |
| 25 | 243.20 | 267.52 |
| 26 | 248.04 | 272.84 |
| 27 | 253.85 | 279.24 |
| 28 | 263.30 | 289.63 |
| 29 | 271.05 | 298.16 |

93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010009 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco User Non-Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use

| 30 | 274.93 | 302.42 |
| :---: | :---: | :---: |
| 31 | 280.74 | 308.81 |
| 32 | 286.56 | 315.22 |
| 33 | 290.19 | 319.21 |
| 34 | 294.06 | 323.47 |
| 35 | 296.00 | 325.60 |
| 36 | 297.94 | 327.73 |
| 37 | 299.88 | 329.87 |
| 38 | 301.82 | 332.00 |
| 39 | 305.69 | 336.26 |
| 40 | 309.57 | 340.53 |
| 41 | 315.38 | 346.92 |
| 42 | 320.95 | 353.05 |
| 43 | 328.70 | 361.57 |
| 44 | 338.39 | 372.23 |
| 45 | 349.78 | 384.76 |
| 46 | 363.34 | 399.67 |
| 47 | 378.60 | 416.46 |
| 48 | 396.04 | 435.64 |
| 49 | 413.24 | 454.56 |
| 50 | 432.62 | 475.88 |
| 51 | 451.75 | 496.93 |
| 52 | 472.83 | 520.11 |
| 53 | 494.14 | 543.55 |
| 54 | 517.16 | 568.88 |
| 55 | 540.17 | 594.19 |
| 56 | 565.12 | 621.63 |
| 57 | 590.31 | 649.34 |
| 58 | 617.20 | 678.92 |
| 59 | 630.52 | 693.57 |
| 60 | 657.41 | 723.15 |
| 61 | 680.66 | 748.73 |
| 62 | 695.92 | 765.51 |
| 63 | 715.06 | 786.57 |
| 64 and over | 726.68 | 799.35 |
| 0-14 | 179.90 | 179.90 |
| 15 | 195.90 | 195.90 |
| 16 | 202.01 | 202.01 |
| 17 | 208.12 | 208.12 |
| 18 | 214.71 | 214.71 |
| 19 | 221.29 | 221.29 |
| 20 | 228.11 | 228.11 |
| 21 | 235.17 | 258.69 |
| 22 | 235.17 | 258.69 |
| 23 | 235.17 | 258.69 |
| 24 | 235.17 | 258.69 |
| 25 | 236.11 | 259.72 |
| 26 | 240.81 | 264.89 |
| 27 | 246.46 | 271.11 |

93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010010 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco Un-Tobaco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco User Non-Tobacco Use obacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User obacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use

| 28 | 255.63 | 281.19 |
| :---: | :---: | :---: |
| 29 | 263.15 | 289.47 |
| 30 | 266.92 | 293.61 |
| 31 | 272.56 | 299.82 |
| 32 | 278.20 | 306.02 |
| 33 | 281.73 | 309.90 |
| 34 | 285.49 | 314.04 |
| 35 | 287.38 | 316.12 |
| 36 | 289.26 | 318.19 |
| 37 | 291.14 | 320.25 |
| 38 | 293.02 | 322.32 |
| 39 | 296.78 | 326.46 |
| 40 | 300.55 | 330.61 |
| 41 | 306.19 | 336.81 |
| 42 | 311.60 | 342.76 |
| 43 | 319.12 | 351.03 |
| 44 | 328.53 | 361.38 |
| 45 | 339.58 | 373.54 |
| 46 | 352.75 | 388.03 |
| 47 | 367.57 | 404.33 |
| 48 | 384.50 | 422.95 |
| 49 | 401.20 | 441.32 |
| 50 | 420.01 | 462.01 |
| 51 | 438.59 | 482.45 |
| 52 | 459.05 | 504.96 |
| 53 | 479.74 | 527.71 |
| 54 | 502.08 | 552.29 |
| 55 | 524.43 | 576.87 |
| 56 | 548.65 | 603.52 |
| 57 | 573.11 | 630.42 |
| 58 | 599.21 | 659.13 |
| 59 | 612.14 | 673.35 |
| 60 | 638.25 | 702.08 |
| 61 | 660.82 | 726.90 |
| 62 | 675.64 | 743.20 |
| 63 | 694.22 | 763.64 |
| 64 and over | 705.51 | 776.06 |
| 0-14 | 189.12 | 189.12 |
| 15 | 205.93 | 205.93 |
| 16 | 212.35 | 212.35 |
| 17 | 218.78 | 218.78 |
| 18 | 225.70 | 225.70 |
| 19 | 232.62 | 232.62 |
| 20 | 239.79 | 239.79 |
| 21 | 247.21 | 271.93 |
| 22 | 247.21 | 271.93 |
| 23 | 247.21 | 271.93 |
| 24 | 247.21 | 271.93 |
| 25 | 248.20 | 273.02 |

93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 33909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8 93909PA0010008 Rating Area 8

Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobaco UserNon-Tobacco User Tobacco User No Tobacco User obacco User/Non-T Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco Use Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco Use

| 26 | 253.14 | 278.45 |
| :---: | :---: | :---: |
| 27 | 259.08 | 284.99 |
| 28 | 268.72 | 295.59 |
| 29 | 276.63 | 304.29 |
| 30 | 280.58 | 308.64 |
| 31 | 286.52 | 315.17 |
| 32 | 292.45 | 321.70 |
| 33 | 296.16 | 325.78 |
| 34 | 300.11 | 330.12 |
| 35 | 302.09 | 332.30 |
| 36 | 304.07 | 334.48 |
| 37 | 306.05 | 336.66 |
| 38 | 308.02 | 338.82 |
| 39 | 311.98 | 343.18 |
| 40 | 315.93 | 347.52 |
| 41 | 321.87 | 354.06 |
| 42 | 327.55 | 360.31 |
| 43 | 335.46 | 369.01 |
| 44 | 345.35 | 379.89 |
| 45 | 356.97 | 392.67 |
| 46 | 370.81 | 407.89 |
| 47 | 386.39 | 425.03 |
| 48 | 404.19 | 444.61 |
| 49 | 421.74 | 463.91 |
| 50 | 441.52 | 485.67 |
| 51 | 461.05 | 507.16 |
| 52 | 482.55 | 530.81 |
| 53 | 504.31 | 554.74 |
| 54 | 527.79 | 580.57 |
| 55 | 551.28 | 606.41 |
| 56 | 576.74 | 634.41 |
| 57 | 602.45 | 662.70 |
| 58 | 629.89 | 692.88 |
| 59 | 643.49 | 707.84 |
| 60 | 670.93 | 738.02 |
| 61 | 694.66 | 764.13 |
| 62 | 710.23 | 781.25 |
| 63 | 729.76 | 802.74 |
| 64 and over | 741.63 | 815.79 |

## Unique Plan Design Supporting Documentation and Justification

HIOS Issuer ID: 93909
HIOS Product IDS: 93909PA001
Applicable HIOS Plan IDs (standard Component): 93909PA0010001, 93909PA0010003, 93909PA0010004, 93909PA0010005, 93909PA0010006, 93909PA0010007, 93909PA0010008, 93909PA0010009, 93909PA0010010

## Reasons the plan design is unique, that is, the reason benefits are incompatible with the parameters of the Actuarial Value Calculator (AVC) and their materiality:

1. JHP is offering two generic drug tiers across select plans, a preferred generic and a non-preferred generic. In the Federal AVC, an effective copay was input to reflect these two tiers. Given JHP does not have experience data, an assumed utilization split was calculated using Wakely's proprietary database of nationally-representative ACA data. This was then applied to the corresponding copays to develop the effective generic copay.
2. Per the CMS 2024 Federal AVC instructions, when a medical deductible is equal to zero dollars and has all copays for medical services, a combined deductible may be applied. This applies to several JHP's plan designs. We are not considering this adjustment a unique plan design when both Tiers are run under a combined deductibles instead of separate deductibles. We are considering this a unique plan design if there is an inconsistency in how we run each Tier due to varying deductibles and not all cost-sharing being copays.

Therefore, this presents a limitation for JHP plans that must be run as a combined deductible on Tier 1, but separate deductibles on Tier 2, as the Federal AVC does not allow for that functionality. For these plans, we ran Tiers one and two separately in the Federal AVC, and then blended the resulting AVs outside of the calculator using a projected cost split ( $65 \%$ Tier 1 and $35 \%$ Tier 2) to arrive at our effective Federal AV for these plans.

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

156.135(b)(2) was used for the generic drug copay adjustment.
156.135(b)(3) was used for the $\$ 0$ medical deductible two-tier adjustment.

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

We confirm that only in-network cost sharing, including multitier networks, was considered.

## FEDERAL AV CALCULATOR SCREENSHOTS

## Description of the standardized plan population data used:

Wakely's proprietary database of nationally-representative Individual ACA data was used to calculate the utilization split between the two generic tiers. JHP's market intel was used to estimate an appropriate tier split for the $\$ 0$ medical deductible plans. We did not adjust the backing continuance tables.

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:

## Generic Drug Copay Differential

On the following plans, JHP intends to offer two generic drug tiers with different copay amounts. For purposes of fitting this plan design into the Federal AVC, the two copay amounts were weighted by a projected utilization split to arrive at an effective copay for the AV input. Wakely's proprietary ACA data indicates that the Tier 1/Tier 2 generic utilization split based on an analysis using JHP's proposed formulary was $35 \% / 65 \%$. Results were rounded to the nearest dollar.

Any plans not included in the exhibit below only have one Generic drug Tier.

| Plan HIOS ID | Member Cost Sharing <br> Generic <br> (Tier 2) |  |  |
| :---: | ---: | ---: | ---: |
|  | Preferred Generic <br> (Tier 1) | AV Input |  |$|$| \$20 |
| :--- |

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

## \$0 Medical Deductible tiered plan design

We are blending the tier 1 and tier 2 AVs after the fact to calculate the effective AV. The projected utilization split of $65 \%$ on tier 1 and $35 \%$ on tier 2 is from JHP market intel. The effective AV is the only AV that should be tested for de minimis compliance, not the tier 1 and tier 2 AVs in isolation. The below table represents the plans for which this applies.

| Plan ID | Federal AV |  |  |
| :---: | ---: | ---: | ---: |
|  | Tier 1 | Tier 2 | Blended |
| 93909PA0010001-00 | $65.8 \%$ | $61.3 \%$ | $64.2 \%$ |
| 93909PA0010001-01 | $65.8 \%$ | $61.3 \%$ | $64.2 \%$ |
| 93909PA0010003-01 | $71.0 \%$ | $70.5 \%$ | $70.8 \%$ |
| 93909PA0010003-04 | $73.5 \%$ | $73.6 \%$ | $73.6 \%$ |
| 93909PA0010003-05 | $87.3 \%$ | $87.6 \%$ | $87.4 \%$ |
| 93909PA0010003-06 | $93.7 \%$ | $96.1 \%$ | $94.5 \%$ |
| 93909PA0010004-06 | $93.9 \%$ | $96.3 \%$ | $94.8 \%$ |
| 93909PA0010005-06 | $94.2 \%$ | $96.5 \%$ | $95.0 \%$ |
| 93909PA0010008-00 | $71.0 \%$ | $70.5 \%$ | $70.8 \%$ |

Below is a summary of the adjustment methodology used for each plan. On/off-exchange variants are not detailed because the methodology is identical for the on/off-exchange variants of the same plan ID. The far-right column is reflective of the input in column I of Table 10 of the PAAM exhibits for the nonCSR variant plans. In the event where both approach 1 and approach 2 are applicable to a plan, we input approach 2.

| Plan ID | Approach 1? | Approach 2? | AV Input for <br> Table 10 |
| :--- | :---: | :---: | :---: |
| 93909PA0010001 | N | Y | Approach 2 |
| 93909PA0010002 | N | N | Standard AV |
| 93909PA0010003 | Y | Y | Approach 2 |
| 93909PA0010003-04 | Y | Y | Approach 2 |
| 93909PA0010003-05 | Y | Y | Approach 2 |
| 93909PA0010003-06 | N | Y | Approach 2 |
| 93909PA0010004 | Y | N | Approach 1 |
| 93909PA0010004-04 | Y | N | Approach 1 |
| 93909PA0010004-05 | Y | N | Approach 1 |
| 93909PA0010004-06 | N | Y | Approach 2 |
| 93909PA0010005 | Y | N | Approach 1 |
| 93909PA0010005-04 | Y | N | Approach 1 |
| 93909PA0010005-05 | Y | N | Approach 1 |
| 93909PA0010005-06 | N | Y | Approach 2 |
| 93909PA0010006 | Y | N | Approach 1 |
| 93909PA0010007 | Y | N | Approach 1 |
| 93909PA0010008 | Y | Y | Approach 2 |
| 93909PA0010009 | Y | N | Approach 1 |
| 93909PA0010010 | Y | N | Approach 1 |

## Certification Language:

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

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 methods.

## FEDERAL AV CALCULATOR SCREENSHOTS

The following pages show the screenshots from the Federal AV calculator of the plan designs. We have only included one screenshot for each respective plan design, with the applicable PLAN IDs listed.
[REDACTED]

## Jefferson Health Plans Redaction Justification - May 17 ${ }^{\text {th }}, 2023$ filing

## Cover Letter

- Redacted names and contact information (page 2)
$\underline{\text { URRT Part III - Federal Actuarial Memorandum / PA Actuarial Memorandum }}$
- Redacted Name of opining actuary (page 7, 27)
- Redated COVID-19 impact (page 13, 32) - confidential and proprietary information
- Redacted Company Contact Information (page 7) - name, telephone number, email address
- Redacted Projected Risk Adjustment Transfers - confidential and proprietary information specifying a company's anticipated risk level in relation to the state average risk level (page 15, 33)
- Specific provider contracting information (page 5, 13, 32) - confidential and proprietary information
- Commission schedules (page 17) - confidential and proprietary information


## PA Actuarial Memo Rate Exhibits

- Redacted column C through E in Tabs "II.a. Reins Table - Exp" and "II.a. Reins Table - Prof" confidential and proprietary information
- Redacted Network Factor in tab "II Rate Development \& Change" - confidential and proprietary information
- Redacted Other Factor in tab "Il Rate Development \& Change" - confidential and proprietary information


## AV Screenshots

- Entire File Redacted

Unique AV Justification File

- Redacted AV Screenshots (pages 79)


## Standard Questions

- Redacted question 3 of standard questions, COVID-19 impact (page 43) - confidential and proprietary information
- Redacted question 5c of standard questions, commission schedules (page 44) - confidential and proprietary information
- Redacted question 9a and 9b of standard questions, PHE morbidity impacts (page 45) confidential and proprietary information specifying a company's anticipated risk level in relation to the state average risk level

Completeness and Redaction Justification Checklist

| Issuer Name: <br> Market: <br> SERFF ID: | Jefferson Health Plans Individual 93909 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 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 |  |  |  |  |
|  | RFJ Part III- Actuarial Memorandum | x | Y | 3 | Y |
|  | Federal Rates Template | X |  |  |  |
| Summary Documents/Confirmation of HIOS \& SERFF Submissions |  |  |  |  |  |
| A.2.B. | HIOS Submission |  |  |  |  |
| A.2.c. | SERFF Submission |  |  |  |  |
| A.2.D. | SERFF Rate/Rule Schedule Tab |  |  |  |  |
| B. | Cover Letter \& PA Bulletin Information |  |  |  |  |
| PA Actuarial Memorandum and Rate Exhibits |  |  |  |  |  |
| D.1.A. | Company Information | x | Y | 6 | Y |
| D.1.B. | Rate History \& Proposed Variation in Rate Changes | N/A | N | 8 | N/A |
| D.1.C. | Average Rate Change | N/A | N | 8 | N/A |
| D.1.D. | Membership Count | x | N | 8 | N/A |
|  | PA Act. Exhibits Table 1 | x | N | 47 | N/A |
| D.1.E. | Benefit Changes | N/A | N | 9 | N/A |
| D.1.F. | Experience Period Claims \& Premium | N/A | N | 9 | N/A |
|  | PA Act. Exhibits Table 2 | N/A | N | 47 | N/A |
| D.1.G. | Credibility of Data | x | N | 9 | N/A |
|  | PA Act. Exhibits Tables 2b, 3b, 46 (if applicable) | X | N | 48 | N/A |
| D.1.H. | Trend Identification | x | N | 10 | N/A |
|  | PA Act. Exhibits Table 3 | x | N | 47 | N/A |
| D.1.I. | Historical Experience | x | N | 10 | N/A |
|  | PA Act. Exhibits Table 4 | x | N | 47 | N/A |
| D.2.A. | Development of PAIR, MAIR and Total Allowed Claims | x | Y | 11 | Y |
|  | PA Act. Exhibits Table 5 | x | N | 51 | N/A |
| D.2.B. | Retention Items | x | N | 16 | N/A |
|  | PA Act. Exhibits Table 6 | x | N | 51 | N/A |
| D.2.C. | Normalized Market-Adjusted Projected Allowed Total Claims | x | N | 18 | N/A |
|  | PA Act. Exhibits Table 7 | x | N | 51 | N/A |
| D.2.D. | Components of Rate Change | x | N | 19 | N/A |
|  | PA Act. Exhibits Table 8 | x | N | 51 | N/A |
|  | PA Act. Exhibits Table 9 | x | N | 51 | N/A |
| D.3. | Plan Rate Development | x | N | 19 | N/A |
|  | PA Act. Exhibits Table 10 | x | N | 52 | N/A |
| D.4. | Plan Premium Development for 21-Year-Old Non-Tobacco User | x | N | 22 | N/A |
|  | PA Act. Exhibits Table 11 | x | N | 53 | N/A |
| D.5.A. | Age and Tobacco Factors | x | N | 23 | N/A |
|  | PA Act. Exhibits Table 12 | x | N | 54 | N/A |
| D.5.B. | Geographic Factors | x | N | 23 | N/A |
|  | PA Act. Exhibits Table 13 | x | N | 54 | N/A |
| D.5.C. | Network Factors | x | N | 23 | N/A |
|  | PA Act. Exhibits Table 14 | X | N | 54 | N/A |
| D.5.D | Rate Change Request Summary | x | N | 23 | N/A |
|  | PA Act. Exhibits Table 15 | x | N | 55 | N/A |
| D.5.E. | Service Area Composition | x | N | 23 | N/A |
| D.5.F | Composite Rating | x | N | 23 | N/A |
| D.6. | Actuarial Certifications | X | Y | 25 | Y |
| Additional Exhibits |  |  |  |  |  |
| E. | Department Plan Design Summary \& Rate Tables | X | N | 56 | N/A |
|  | Service Area Map | X | N | 59 | N/A |
| Redaction Justification (must be submitted if any information is redacted) |  | x |  |  | Y |


[^0]:    Key
    On-exchange and Off-exchange service area

