## Independence 業

May 17, 2023
Ms. Lindsi Swartz, Director
Bureau of Accident and Health Insurance
Pennsylvania Insurance Department
1311 Strawberry Square
Harrisburg, PA 17120

## SUBMITTED VIA SERFF

## RE: QCC Insurance Company, Inc. Individual PPO Rate Filing effective 1/1/2024 INAC-133668798

Dear Ms. Swartz:
Attached is the 2024 annual rate filing for PPO plans of QCC Insurance Company, Inc. (QCC) in the Individual (non-group) marketplace in the Commonwealth of Pennsylvania. Rates for new and renewing plans are being filed and satisfy market reform requirements of the Affordable Care Act (ACA).

This rate filing includes rates for these plans and specifies compliance with rating requirements of the ACA. The enclosed is for rating periods effective from January 1, 2024 through December 31, 2024.

Per the guidance provided in the 2024 ACA-Compliant Health Insurance Rate Filing Guidance provided by the Pennsylvania Insurance Department, we applied a Reinsurance Morbidity Adjustment factor of 1.00 to all individual plans. We also applied a factor of 1.22 to Silver plans for the impact of non-payment of CSR costs per the guidance. This submission incorporates a $50 \%$ coinsurance parameter for the reinsurance program.

The proposed rates represent a $2.7 \%$ decrease over the previously approved 2023 rates.
Information for the Pennsylvania Bulletin:

1. Company Name and NAIC Number: QCC Insurance Company, Inc. 93688
2. Market
3. On or Off Exchange
4. Effective Date of Coverage

Individual
On and Off
January 1, 2024
5. Average Rate Change Requested $-2.7 \%$
6. Range of Rate Changes Requested $\quad-3.4 \%$ to $-2.3 \%$

## Independence 漂

7. Total Annual Revenue Generated from the Proposed Rate Change
-\$7,361,242
8. Products
9. Rating Areas and Change 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 numbers

PPO
Rating Area 8; No Change
Gold, Silver, Bronze
35,089 lives
16 plans in 2024; 14 plans in 2023
INLG-133660974, INLG-133660976,
INLG-133661007
INLG-PA24-125116242,
INLG-PA24-125116369
See appendix for form numbers
14. HIOS Issuer ID \# and submission tracking Number

HIOS Issuer ID \# 31609; Tracking \# N/A

Please contact $\square$ with any questions regarding this filing.

Sincerely,

# Independence 漂 

## APPENDIX

Form Numbers
08535.ON Rev. 1.24

08535-OC.ON Rev. 1.24
08535.OFF Rev. 1.24

08535-OC.OFF Rev. 1.24
08537.ON.PDEN Rev. 1.24

08537-OC.ON.PDEN Rev. 1.24
08537.OFF Rev. 1.24

08537-OC.OFF Rev. 1.24
08537.ON.PDEN.HSA Rev. 1.24

08537-OC.ON.PDEN.HSA Rev. 1.24
08537.OFF.PDEN.HSA Rev. 1.24

08537-OC.OFF.PDEN.HSA Rev. 1.24
PREV/SCH-II Rev. 1.24

## PENNSYLVANIA ACTUARIAL MEMORANDUM

## PURPOSES

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

## 1. BASIC INFORMATION AND DATA

## A. COMPANY INFORMATION

| Company Legal Name: | QCC Insurance Co., Inc. ("QCC") |
| :--- | :--- |
| State: | Pennsylvania |
| NAIC \#: | 93688 |
| Market: | Individual |
| Marketplace: | On and Off Exchange |
| Effective Date(s): | $1 / 1 / 2024-12 / 31 / 2024$ |
| Average Rate Change: | $-2.7 \%$ |
| Range of Rate Changes: | $-3.4 \%$ to -2.3\% |
| Products: | PPO |
| Rating Areas: | Rating Area 8 |
| Metal Levels: | Gold, Silver, Bronze, Catastrophic |
| Current Members: | 35,089 |
| Number of 2024 Plans: | 16 |
| HIOS Issuer ID (5-digit): | 31609 |

Worksheet 1 of the accompanying URRT contains experience period data and development of the projected Single Risk Pool Gross Premium Average Rate PMPM for the individual market for QCC. Worksheet 2 contains experience period data and projections by product for the single risk pool for the same entities. This memorandum pertains only to plans denoted in Worksheet 2 by Plan IDs starting with the sequence 31609 .

## COMPANY CONTACT INFORMATION

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


1

PA Actuarial Memorandum
May 17, 2023

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

| January 1, 2020 | $5.10 \%$ | INAC- 131927222 |
| :--- | :--- | :--- |
| January 1, 2021 | $-3.90 \%$ | INAC- 132358777 |
| January 1, 2022 | $-0.80 \%$ | INAC- 132818429 |
| January 1, 2023 | $0.90 \%$ | INAC- 133254407 |

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

Proposed rate changes may vary by metallic tier and plan based on plan benefit changes, and the revision to the CSR Defunding Adjustment factor.

## C. AVERAGE RATE CHANGE

The average proposed rate change shown in Cell AC15 of Table 10 is $-2.7 \%$. The changes to the single risk pool gross premium average rate per member per month (PMPM) from calendar year 2022 to calendar year 2024 are incorporated into the pricing and reflected in the Unified Rate Review Template.

The change in 21-year-old Non-Tobacco Premium PMPM calculated in Table 11, Cell AN13 is -2.7\%.

## D. MEMBERSHIP COUNT

Table 1 illustrates the Experience Period member-months, Current Period members as of February 1, 2023, and Projected Rating Period Member-months by ages.

## E. BENEFIT CHANGES

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

## F. EXPERIENCE PERIOD CLAIMS AND PREMIUMS

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

We combined the experience period data for QCC with the experience period data for Keystone Health Plan East ("KHPE"). This should provide a more stable basis for projecting the Index Rate. The combined INAC-133668798 2 PA Actuarial Memorandum
QCC Consumer
data is shown in Tab Ib. The Change in Network Factor is intended to result in QCC rates that are reasonable in relation to KHPE rates.

Experience period premium, claims, and member months are obtained from the company's internal data warehouse. The claims data is collected for incurred dates from January through December 2022 and paid through February 2023. Earned premiums and member months are for January through December 2022. The data are for all direct-written individual business of QCC in the Commonwealth of Pennsylvania, including out-of-network claims written by QCC but paid by QCC for POS plans. No private reinsurance was applicable.

The Non-EHB benefits portion of Allowed Claims is shown separately in cell H36 of Table 2. Capitation is uniform by age for the experience period. Net pharmacy rebates are illustrated in cell I36 of Table 2.

## Projected Risk Adjustment PMPM

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

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

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

The projected risk adjustment amounts for KHPE and Independence Blue Cross (QCC) are consistent with the projection made in the respective submissions. We also considered preliminary 2022 risk transfer results.

In the URRT v6.0, it is necessary to divide Risk Adjustment by the Paid to Allowed factor when it is used in calculations based on Allowed Claims to produce calculations that are consistent with the Actuarial Memo Rate Exhibit.

## G. CREDIBILITY OF DATA

The experience period data, defined in Section $F$ as the combined experience of QCC Insurance Company, Inc., and the experience period data for Keystone Health Plan East ("KHPE"). is considered $100 \%$ credible.

## H. TREND IDENTIFICATION

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

We populated the URRT with the Total Annual Trend calculated in cell C52 of Table 3. The URRT requires that factors are rounded to four decimal places which results in some small differences. To arrive more closely with the result in the Actuarial Memo Rate Exhibit, we adjusted the utilization component of Capitation trend in the URRT.

## I. HISTORICAL EXPERIENCE

Table 4 illustrates historical experience from 2018 through 2022 for the product line.

## a. Annualized Cost Trend

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

## b. Annualized Utilization Trend

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

## c. Rebates

Rebate payments will be made as appropriate for 2022 for QCC in Consumer. Rebate payments will be made if applicable for the 2023 policy period. We do not anticipate 2024 rebates for QCC Consumer.

## d. Benefit Changes

Historical medical costs are normalized for the impact of benefit and mix factors to isolate the effect that changes in plan design or member movements amongst plans has on historical trend. By isolating this impact we avoid projecting cost trends into the future that are due to non-repeatable historical member movements or benefit changes.

1. Benefit changes are calculated to value the cost-to-health-plan impact of year-over-year changes in plan designs. The methodology used to calculate the benefit changes is consistent with the one used in the calculation of Pricing AV.
2. Mix impact is calculated using the historical average costs by member at the metallic level, separately for HMO and PPO products.

## J. TERMINATED PLANS

The following plan is being terminated in 2024:

31609PA0190003 Personal Choice PPO Silver

## 2. RATE DEVELOPMENT AND CHANGE

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

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

## Changes in Population Risk Morbidity

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

## COVID-19 Impact



## Development of Reinsurance Tables

The Continuance Table for Calculating Reinsurance Impact - Individual Market Only, Experience Period Information was populated using 2022 QCC Individual claims data by individual member. 2022 claims
paid through February 2023 were completed and complied into the Annual Incurred Claims Ranges shown on Tab II.a. of the Actuarial Memorandum Exhibit.

The Continuance Table for Calculating Reinsurance Impact - Individual Market Only, Projection Period Information was populated by trending the data from the Experience Period table to 2024 using a $12 \%$ trend assumption on the incurred claims. The resulting impact is shown in Cell E7 of Tab II.b. of the Actuarial Memorandum Exhibit.

## Changes in Other Factors

Experience period allowed claims are adjusted to account for differences in the single risk pool population underlying the experience and the anticipated population in the projection period pertaining to several factors not due to changes in morbidity or the costs and utilization of medical care. This adjustment reflects: additional benefits required to be covered as essential health benefits; recently mandated benefits required by state law that are not reflected in the experience period data; benefits in the experience that are removed for the projection period; anticipated changes in the average utilization of services due to differences in average cost sharing requirements during the experience period and average cost sharing requirements in the projection period; changes in demographic characteristics of the single risk pool experience period population and the projection period population (including age, gender, region, and tobacco use); changes in the provider network (adding or removing a provider system or introducing a limited network option); and anticipated changes in pharmacy rebates.

Table 5 of the Actuarial Memorandum Rate Exhibit shows the components used in calculating change in other. The calculations of the components are based on the changes in values shown in Table 7.

CSR payments are funded through premiums in this filing. The additional cost to provide the CSRs is recognized in Column P of Table 10 of the Actuarial Memorandum Rate Exhibit. In URRT Part I, the cost is reflected in the Paid to Allowed factor. The Paid to Allowed factor in the URRT Part 1 is equal to the Paid to Allowed factor in Table 5 multiplied by the value in cell P15 of Table 10 of the Actuarial Memorandum Rate Exhibit.

## B. RETENTION ITEMS

Table 6 illustrates the retention items, expressed as percentages of premium. Consistent with conversations with our State regulator, no Pricing load was applied for the Managed Care Assessment levied pursuant to Article VIII-I of the Pennsylvania Code, as it will be separately reimbursed. Federal Income Tax is calculated by applying the tax rate to the sum of the HIF plus Profit/Contingency.

Administrative Expenses
General and Claims
Agent/Broker Fees and Commissions
13.02\%
10.44\%
1.78\%

| Quality Improvement Initiatives | $0.80 \%$ |  |
| :--- | :---: | :---: |
| Taxes and Fees |  | $2.60 \%$ |
| RA User Fee | $0.03 \%$ |  |
| PCORI Fee | $0.04 \%$ |  |
| PA Premium Tax | $2.00 \%$ |  |
| Federal Income Tax | $0.53 \%$ |  |
| Health Insurance Providers Fee | $0.00 \%$ |  |
| Profit/Contingency |  | $2.00 \%$ |
| Total Retention |  | $17.61 \%$ |

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

Table 7 compares the normalization factors used in this filing to those used in the 2023 filing. The changes in the factors reflect small differences from the projected populations in 2023 and 2024.

## D. COMPONENTS OF RATE CHANGE

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

Data in Table 9 is consistent with the 2023 and 2024 URRT with the exception of Risk Adjustment which was revised to project company-specific values.

## E. MLR DEMONSTRATION

| Projected Claims PMPM (After Reinsurance) | $\$ 525.46$ |
| :--- | ---: |
| Premium PMPM | $\$ 637.83$ |
| Quality Improvement Expense PMPM | $\$ 5.01$ |
| Exchange User Fee PMPM | $\$ 12.85$ |
| HIF PMPM | $\$ 0.00$ |
| Federal Income Tax PMPM | $\$ 3.32$ |
| Premium Tax PMPM | $\$ 12.52$ |
| Federal MLR | $85.0 \%$ |

## 3. PLAN RATE DEVELOPMENT

Table 10 is populated with plan information consistent with entries in the 2024 URRT. Plan mappings, where applicable, are illustrated in Column F of Table 10.

Attached to this actuarial memorandum are exhibits providing actuarial certifications for the use of alternate methods of calculating the Actuarial Value, where applicable, as well as required support for the calculations.

The factor "AV and Cost Sharing Design of Plan" in Worksheet 2 of the URRT is the product of the Pricing AV, the Non-Funding of CSR Adjustment, and the Benefit Richness Factors from the Actuarial Memo Rate Exhibit. Again, please note that the URRT requires factors to be rounded to four decimal places, resulting in small differences.

## 4. PLAN PREMIUM DEVELOPMENT FOR 21-YEAR OLD NON-TOBACCO USER

Table 11 is populated from other sections of the Rate Exhibits, along with the population by age and rating area for the Projection Period.

## 5. PLAN FACTORS

Tables 12, 13, and 14 illustrate the factors used in pricing for age, tobacco, geographic rating area, and network. The tobacco factors match the previously approved tobacco factors from the 2023 filing.

## 6. ACTUARIAL CERTIFICATION

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

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

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

- The projected index rate is:
-In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.08(d)(1) and 147.106);
—Developed in compliance with applicable Actuarial Standards of Practice;
-Reasonable in relation to the benefits provided and the population anticipated to be covered; and
-Neither excessive nor deficient.
- The index rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan level rates.
- The percent of total premium that represents essential health benefits included in Worksheet 2, Sections III and IV were calculated in accordance with actuarial standards of practice.
- The AV Calculator was used to determine the AV Metal Values illustrated in Worksheet 2 of the Part I Unified Rate Review Template for all plans, unless an alternate methodology was required. If an alternate methodology was used to calculate the AV Metal Value for at least one plan offered, a copy of the actuarial certification required by 45 CFR Part 156 , $\S 156.135$ will be included.
- All factor, benefit, and other changes from the prior approved filing have been disclosed in the actuarial memorandum.
- New plans cannot be considered modifications of existing plans under the uniform modification standards in 45 CFR 147.106.
- The information presented in the PA Actuarial Memorandum and PA Actuarial Memorandum Rate Exhibits is consistent with the information presented in the 2024 Rate Filing Justification.

May 17, 2023


Table 4. Historical Experience

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Table 2b. Manual Experience Period Claims and Premiums


Table 3b. Manual Trend Components


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

| Carrier Name: | QCC Insurance Company, Inc. | Attachment Point: | \$60,000 |
| :---: | :---: | :---: | :---: |
| Product(s): | PPO | Reinsurance Cap: | \$100,000 |
| Market Segment: | Individual | Coinsurance Rate: | 50\% |
| Rate Effective Date: | 1/1/2024 |  |  |
| Incurred Dates: | 1/1/2022 to 12/31/2022 | Proj. Incurred Claim Impact: | -4.1\% |


| 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 | 180,849 | 1,723,890 | \$439,106,099 | \$439,106,099 |
| \$30,000 | \$34,999 | 774 | 8,341 | \$25,065,010 | \$25,065,010 |
| \$35,000 | \$39,999 | 631 | 6,862 | \$23,622,059 | \$23,622,059 |
| \$40,000 | \$44,999 | 469 | 5,270 | \$19,895,900 | \$19,895,900 |
| \$45,000 | \$49,999 | 394 | 4,447 | \$18,760,386 | \$18,760,386 |
| \$50,000 | \$54,999 | 303 | 3,327 | \$15,871,543 | \$15,871,543 |
| \$55,000 | \$59,999 | 268 | 2,993 | \$15,397,898 | \$15,397,898 |
| \$60,000 | \$64,999 | 235 | 2,660 | \$14,684,799 | \$14,392,400 |
| \$65,000 | \$69,999 | 225 | 2,501 | \$15,196,232 | \$14,348,116 |
| \$70,000 | \$74,999 | 208 | 2,352 | \$15,081,808 | \$13,780,904 |
| \$75,000 | \$79,999 | 178 | 1,969 | \$13,783,749 | \$12,231,875 |
| \$80,000 | \$84,999 | 168 | 1,920 | \$13,819,393 | \$11,949,697 |
| \$85,000 | \$89,999 | 141 | 1,537 | \$12,346,861 | \$10,403,430 |
| \$90,000 | \$94,999 | 110 | 1,204 | \$10,170,367 | \$8,385,184 |
| \$95,000 | \$99,999 | 124 | 1,418 | \$12,068,312 | \$9,754,156 |
| \$100,000 | \$109,999 | 146 | 1,622 | \$15,309,346 | \$12,389,346 |
| \$110,000 | \$119,999 | 141 | 1,536 | \$16,217,275 | \$13,397,275 |
| \$120,000 | \$129,999 | 122 | 1,347 | \$15,220,692 | \$12,780,692 |
| \$130,000 | \$139,999 | 88 | 966 | \$11,821,379 | \$10,061,379 |
| \$140,000 | \$149,999 | 87 | 956 | \$12,590,982 | \$10,850,982 |
| \$150,000 | \$159,999 | 66 | 740 | \$10,228,166 | \$8,908,166 |
| \$160,000 | \$169,999 | 70 | 777 | \$11,570,312 | \$10,170,312 |
| \$170,000 | \$179,999 | 55 | 638 | \$9,618,945 | \$8,518,945 |
| \$180,000 | \$189,999 | 60 | 659 | \$11,077,584 | \$9,877,584 |
| \$190,000 | \$199,999 | 45 | 477 | \$8,759,355 | \$7,859,355 |
| \$200,000 | \$209,999 | 34 | 390 | \$6,978,624 | \$6,298,624 |
| \$210,000 | \$219,999 | 45 | 506 | \$9,686,157 | \$8,786,157 |
| \$220,000 | \$229,999 | 44 | 493 | \$9,916,755 | \$9,036,755 |
| \$230,000 | \$239,999 | 28 | 304 | \$6,598,803 | \$6,038,803 |
| \$240,000 | \$249,999 | 28 | 322 | \$6,837,705 | \$6,277,705 |
| \$250,000 | \$259,999 | 22 | 237 | \$5,594,639 | \$5,154,639 |
| \$260,000 | \$269,999 | 20 | 231 | \$5,285,312 | \$4,885,312 |
| \$270,000 | \$279,999 | 26 | 305 | \$7,149,603 | \$6,629,603 |
| \$280,000 | \$289,999 | 15 | 167 | \$4,277,472 | \$3,977,472 |
| \$290,000 | \$299,999 | 10 | 107 | \$2,931,399 | \$2,731,399 |
| \$300,000 | \$324,999 | 26 | 297 | \$8,054,140 | \$7,534,140 |
| \$325,000 | \$349,999 | 25 | 277 | \$8,427,848 | \$7,927,848 |
| \$350,000 | \$374,999 | 18 | 200 | \$6,563,718 | \$6,203,718 |
| \$375,000 | \$399,999 | 20 | 225 | \$7,798,976 | \$7,398,976 |
| \$400,000 | \$424,999 | 12 | 138 | \$4,962,632 | \$4,722,632 |
| \$425,000 | \$449,999 | 8 | 95 | \$3,508,075 | \$3,348,075 |
| \$450,000 | \$474,999 | 10 | 99 | \$4,643,598 | \$4,443,598 |
| \$475,000 | \$499,999 | 9 | 98 | \$4,407,822 | \$4,227,822 |
| \$500,000 | \$599,999 | 14 | 150 | \$7,740,811 | \$7,460,811 |
| \$600,000 | \$699,999 | 10 | 109 | \$6,634,340 | \$6,434,340 |
| \$700,000 | \$799,999 | 10 | 119 | \$7,409,383 | \$7,209,383 |
| \$800,000 | \$899,999 | 5 | 60 | \$4,208,435 | \$4,108,435 |
| \$900,000 | \$999,999 | 7 | 84 | \$6,691,847 | \$6,551,847 |
| \$1,000,000+ |  | 10 | 117 | \$13,393,091 | \$13,193,091 |
| Total |  | 186,413 | 1,785,539 | \$946,985,638 | \$908,359,877 |

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

| Carrier Name: | QCC Insurance Company, Inc. | Attachment Point: | \$60,000 |
| :---: | :---: | :---: | :---: |
| Product(s): | PPO | Reinsurance Cap: | \$100,000 |
| Market Segment: | Individual | Coinsurance Rate: | 50\% |
| Rate Effective Date: | 1/1/2024 |  |  |
|  |  | Proj. Incurred Claim Impact: | -4.3\% |
|  |  | Proj. Morbidity Impact: | 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 | 179,624 | 1,710,219 | \$509,843,448 | \$509,843,448 |
| \$30,000 | \$34,999 | 899 | 10,050 | \$29,128,295 | \$29,128,295 |
| \$35,000 | \$39,999 | 651 | 7,107 | \$24,441,688 | \$24,441,688 |
| \$40,000 | \$44,999 | 547 | 5,925 | \$23,199,969 | \$23,199,969 |
| \$45,000 | \$49,999 | 510 | 5,538 | \$24,122,452 | \$24,122,452 |
| \$50,000 | \$54,999 | 387 | 4,331 | \$20,263,088 | \$20,263,088 |
| \$55,000 | \$59,999 | 314 | 3,553 | \$18,020,231 | \$18,020,231 |
| \$60,000 | \$64,999 | 305 | 3,423 | \$19,002,468 | \$18,651,234 |
| \$65,000 | \$69,999 | 230 | 2,482 | \$15,530,484 | \$14,665,242 |
| \$70,000 | \$74,999 | 207 | 2,354 | \$14,998,861 | \$13,709,430 |
| \$75,000 | \$79,999 | 186 | 2,099 | \$14,381,131 | \$12,770,566 |
| \$80,000 | \$84,999 | 178 | 1,973 | \$14,656,519 | \$12,668,260 |
| \$85,000 | \$89,999 | 178 | 2,020 | \$15,542,109 | \$13,111,054 |
| \$90,000 | \$94,999 | 169 | 1,900 | \$15,614,181 | \$12,877,091 |
| \$95,000 | \$99,999 | 137 | 1,508 | \$13,347,893 | \$10,783,947 |
| \$100,000 | \$109,999 | 251 | 2,813 | \$26,220,847 | \$21,200,847 |
| \$110,000 | \$119,999 | 198 | 2,180 | \$22,713,636 | \$18,753,636 |
| \$120,000 | \$129,999 | 154 | 1,723 | \$19,110,062 | \$16,030,062 |
| \$130,000 | \$139,999 | 120 | 1,339 | \$16,140,530 | \$13,740,530 |
| \$140,000 | \$149,999 | 119 | 1,312 | \$17,282,551 | \$14,902,551 |
| \$150,000 | \$159,999 | 101 | 1,134 | \$15,700,348 | \$13,680,348 |
| \$160,000 | \$169,999 | 75 | 813 | \$12,357,258 | \$10,857,258 |
| \$170,000 | \$179,999 | 71 | 764 | \$12,459,373 | \$11,039,373 |
| \$180,000 | \$189,999 | 64 | 719 | \$11,847,370 | \$10,567,370 |
| \$190,000 | \$199,999 | 48 | 541 | \$9,379,366 | \$8,419,366 |
| \$200,000 | \$209,999 | 57 | 619 | \$11,714,137 | \$10,574,137 |
| \$210,000 | \$219,999 | 48 | 552 | \$10,325,330 | \$9,365,330 |
| \$220,000 | \$229,999 | 46 | 520 | \$10,353,789 | \$9,433,789 |
| \$230,000 | \$239,999 | 49 | 535 | \$11,516,501 | \$10,536,501 |
| \$240,000 | \$249,999 | 33 | 351 | \$8,105,648 | \$7,445,648 |
| \$250,000 | \$259,999 | 25 | 283 | \$6,380,930 | \$5,880,930 |
| \$260,000 | \$269,999 | 34 | 377 | \$9,029,102 | \$8,349,102 |
| \$270,000 | \$279,999 | 37 | 431 | \$10,198,630 | \$9,458,630 |
| \$280,000 | \$289,999 | 32 | 355 | \$9,141,599 | \$8,501,599 |
| \$290,000 | \$299,999 | 20 | 217 | \$5,918,377 | \$5,518,377 |
| \$300,000 | \$324,999 | 51 | 569 | \$15,821,090 | \$14,801,090 |
| \$325,000 | \$349,999 | 45 | 520 | \$15,172,912 | \$14,272,912 |
| \$350,000 | \$374,999 | 29 | 322 | \$10,445,129 | \$9,865,129 |
| \$375,000 | \$399,999 | 25 | 285 | \$9,698,408 | \$9,198,408 |
| \$400,000 | \$424,999 | 16 | 185 | \$6,656,016 | \$6,336,016 |
| \$425,000 | \$449,999 | 15 | 164 | \$6,551,257 | \$6,251,257 |
| \$450,000 | \$474,999 | 14 | 152 | \$6,477,642 | \$6,197,642 |
| \$475,000 | \$499,999 | 16 | 177 | \$7,806,447 | \$7,486,447 |
| \$500,000 | \$599,999 | 33 | 368 | \$17,952,384 | \$17,292,384 |
| \$600,000 | \$699,999 | 16 | 177 | \$10,159,597 | \$9,839,597 |
| \$700,000 | \$799,999 | 9 | 95 | \$6,636,295 | \$6,456,295 |
| \$800,000 | \$899,999 | 9 | 96 | \$7,655,134 | \$7,475,134 |
| \$900,000 | \$999,999 | 9 | 108 | \$8,404,666 | \$8,224,666 |
| \$1,000,000+ |  | 22 | 261 | \$30,473,607 | \$30,033,607 |
| Total |  | 186,413 | 1,785,539 | \$1,187,898,784 | \$1,136,241,961 |






## PA Rate Quarterly Template Part V

 Consumer FactorsTable 12. Age and Tobacco Factors

| Projection Period Age and Tobacco Factors |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Age <br> Band | Age Factor | Tobacco Factor | Age <br> Band | Age Factor | Tobacco Factor |
| 0-14 | 0.765 |  | 40 | 1.278 | 1.225 |
| 15 | 0.833 |  | 41 | 1.302 | 1.225 |
| 16 | 0.859 |  | 42 | 1.325 | 1.225 |
| 17 | 0.885 |  | 43 | 1.357 | 1.225 |
| 18 | 0.913 |  | 44 | 1.397 | 1.225 |
| 19 | 0.941 |  | 45 | 1.444 | 1.225 |
| 20 | 0.970 |  | 46 | 1.500 | 1.225 |
| 21 | 1.000 | 1.125 | 47 | 1.563 | 1.225 |
| 22 | 1.000 | 1.125 | 48 | 1.635 | 1.225 |
| 23 | 1.000 | 1.125 | 49 | 1.706 | 1.225 |
| 24 | 1.000 | 1.125 | 50 | 1.786 | 1.375 |
| 25 | 1.004 | 1.125 | 51 | 1.865 | 1.375 |
| 26 | 1.024 | 1.125 | 52 | 1.952 | 1.375 |
| 27 | 1.048 | 1.125 | 53 | 2.040 | 1.375 |
| 28 | 1.087 | 1.125 | 54 | 2.135 | 1.375 |
| 29 | 1.119 | 1.125 | 55 | 2.230 | 1.375 |
| 30 | 1.135 | 1.175 | 56 | 2.333 | 1.375 |
| 31 | 1.159 | 1.175 | 57 | 2.437 | 1.375 |
| 32 | 1.183 | 1.175 | 58 | 2.548 | 1.375 |
| 33 | 1.198 | 1.175 | 59 | 2.603 | 1.375 |
| 34 | 1.214 | 1.175 | 60 | 2.714 | 1.375 |
| 35 | 1.222 | 1.175 | 61 | 2.810 | 1.375 |
| 36 | 1.230 | 1.175 | 62 | 2.873 | 1.375 |
| 37 | 1.238 | 1.175 | 63 | 2.952 | 1.375 |
| 38 | 1.246 | 1.175 | 64+ | 3.000 | 1.375 |
| 39 | 1.262 | 1.175 |  |  |  |


| Carrier Name: | QCC Insurance Company, Inc. |
| :--- | :--- |
| Product(s): | PPO |
| 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 |  | 1.000 | 1.000 |
| Rating Area 8 | Bucks, Chester, Delaware, Philadelphia, <br> Montgomery |  |  |
| Rating Area 9 |  |  |  |

Table 14. Network Factors

| Projection Period Network Factors |  |  |  |  |  |  |  |
| :--- | :--- | ---: | ---: | ---: | :---: | :---: | :---: |
| Network Name | Rating Area <br> Factor | Proposed <br> Factor | Approval <br> Date |  |  |  |  |
| PPO | Rating Area 8 | 1.000 | 1.000 | $5 / 6 / 1997$ |  |  |  |
|  | Rating Area 8 | 0.950 | 0.950 | $5 / 6 / 1997$ |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

PA Rate Template Part VI - Rate Change Summary Table 15. Rate Change Summary Information

Overview

| Overview |  |  |
| :---: | :---: | :---: |
| Inital Requested Average Rate Change: |  | 2.66\% |
| Revised Requested Average Rate Change: |  | -2.66\% |
| Minimum Requested Rate Change: |  | -3.45\% |
| Maximum Requested Rate Change: |  | -2.32\% |
| Mapped Members: |  | 35,089 |
| Avalable in Rating Areas: | Rating Ar |  |

Key Information

| Premium |  |  |
| :---: | :---: | :---: |
| ms |  | 319,617,503:72 |
| Administrative Expenses | \$ | 825.00 |
| Taxes \& fees | \$ | 099,06.00 |






## QCC Insurance Company <br> Individual <br> Plan Design Summary

| HIOS Plan ID | Plan Marketing Name | Product | Metal | On/Off Exchange | Network | Rating Area | Counties Covered |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31609PA0070002 | Personal Choice PPO Gold | PPO | Gold | On/Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0070003 | Personal Choice PPO Silver | PPO | Silver | On/Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0070004 | Personal Choice PPO Bronze | PPO | Expanded Bron | On/Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0070011 | Personal Choice PPO Gold Classic | PPO | Gold | On/Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0070012 | Personal Choice PPO Gold Deluxe | PPO | Gold | On/Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0160001 | Personal Choice EPO Catastrophic | EPO | Catastrophic | On/Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0160005 | Personal Choice EPO Bronze Reserve | EPo | Expanded Bron | On/Off | Personal Choice |  | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0160006 | Personal Choice EPO Bronze Basic | EPO | Expanded Bron | On/Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0160009 | Personal Choice EPO Bronze Classic | EPO | Expanded Bron | On/Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0180001 | Personal Choice EPO Catastrophic | EPO | Catastrophic | Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0180004 | Personal Choice EPO Bronze Reserve | EPo | Expanded Bron | Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0180005 | Personal Choice EPO Bronze Basic | EPO | Expanded Bron | Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0190002 | Personal Choice PPO Gold | PPO | Gold | Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0190004 | Personal Choice PPO Bronze | PPO | Expanded Bron | Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0190006 | Personal Choice PPO Gold | PPO | Gold | Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
| 31609PA0180008 | Personal Choice EPO Bronze Classic | EPo | Expanded Bron | Off | Personal Choice | 8 | Bucks, Chester, Delaware, Montgomery, Philadelphia |
|  |  |  |  |  |  |  |  |




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

## Rating Area

Rating Factor
Rating Area 8
1.0000

## GENERAL OVERVIEW

## PURPOSES

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

## GENERAL INFORMATION

## COMPANY IDENTIFYING INFORMATION

Company Legal Name: QCC Insurance Company, Inc. ("QCC")
State: Pennsylvania
HIOS Issuer ID (5-digit): 31609

| Market: | Individual |
| :--- | :--- |
| Effective Date(s): | $1 / 1 / 2024$ |

Worksheet 1 of the accompanying URRT contains experience period data and development of the projected Single Risk Pool Gross Premium Average Rate PMPM for the individual market for QCC. Worksheet 2 contains experience period data and projections by product for the single risk pool for the same entities.

## COMPANY CONTACT INFORMATION

## Primary Contact Name:

Primary Contact Telephone Number:
Primary Contact Email Address:


## PROPOSED RATE INCREASE

The changes to the single risk pool gross premium average rate per member per month (PMPM) from calendar year 2022 to calendar year 2024 were incorporated into the pricing and reflected in the Unified Rate Review Template. The changes are driven by factors including: changes in market-wide population risk morbidity and covered services, increasing unit costs for medical services, increasing utilization of medical services, increasing fees and taxes imposed by the federal government, anticipated costs to administer the plan, and anticipated revenue or payments due to market-wide risk adjustment.

The Federal government ended the Health Insurance Providers Fee beginning with premiums due in 2021.

We are projecting that claims will increase by $9.6 \%$ in 2024. Nearly half of the change in health care service costs is driven by changes to health care provider fees.

A reinsurance program administered by the state became effective January 1, 2021. We project that this will reduce rates by approximately $4.3 \%$ in the 2024 time period.

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

The weighted average increase across QCC plans based on projected membership, inclusive of the impact of benefit and cost sharing changes, is $-2.7 \%$. The minimum increase is $-3.4 \%$ and the maximum increase is $-2.3 \%$.

## WORKSHEET 1: MARKET EXPERIENCE

## SECTION I: EXPERIENCE PERIOD DATA

## SINGLE RISK POOL

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

## PAID THROUGH DATE

Experience period premium, claims, and member months are obtained from the company's internal data warehouse. The claims data is collected for incurred dates from January through December 2022 and paid through February 2023. Earned premiums and member months are for January through December 2022. The data are for all direct-written individual business of QCC in the Commonwealth of Pennsylvania.

## PREMIUMS IN EXPERIENCE PERIOD

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

## ALLOWED AND INCURRED CLAIMS INCURRED DURING THE EXPERIENCE PERIOD

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

Insurer fee-for-service claims expenses and member liabilities for dates of service in January 2022 through December 2022 and paid through February 2023 are sourced from the IBCFOC's internal data warehouse. The claims and member liabilities are completed with incurred but not reported (IBNR) adjustments to develop ultimate incurred insurer fee-for-service claims expenses and member liabilities for the January through December 2022 period. Capitation amounts are also sourced from the internal data warehouse for the January through December 2022 period but they are not adjusted for IBNR.

## Allowed Claims

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

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

## IBNR Development

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

The completion factors are developed annually in the $2 Q-3 Q$ period. We do not believe our IBNR is unusually high or unusually low for incurred 2022 paid through February 2023.

## Experience Period Index Rate

The Index Rate of Experience Period is estimated by removing cost and utilization trend from the Index Rate for Projection Period.

## SECTION II: PROJECTIONS

## BENEFIT CATEGORIES

Experience Period Index Rate PMPM Data is provided in Section II. The data is provided by benefit category using a standardized indicator from the internal data warehouse that assigns each claim line to a category based on the type of provider and the location of the service.

## PROJECTION FACTORS

The estimated incurred claims experience on an allowed basis for January 2022 through December 2022 is projected to the future rating period by several factors.

## Morbidity Adjustment

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

## COVID-19 Impact



## Demographic Shift

This factor reflects the projected change in the average age, rating area, and tobacco utilization of the single risk pool.

## Plan Design Changes

This factor reflects any changes in EHB allowed claims due to plan design changes.

## Other Changes

This factor reflects changes in cost related to items other than changes in Morbidity, Demographic Shift, or Plan Design.

## Trend Factors

## a. Annualized Cost Trend

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

## b. Annualized Utilization Trend

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

## CREDIBILITY MANUAL RATE DEVELOPMENT

We combined the experience period data for QCC with the experience period data for Keystone Health Plan East ("KHPE"). This should provide a more stable basis for projecting the Index Rate. The combined data is shown in Tab Ib. The Change in Network Factor is intended to result in QCC rates that are reasonable in relation to KHPE rates. The combined claims are determined to be $100 \%$ credible as reflected in Table 5.

## RISK ADJUSTMENT AND REINSURANCE

## Projected Risk Adjustment PMPM

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

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

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

The projected risk adjustment amounts for KHPE and Independence Blue Cross (QCC) are consistent with the projection made in the respective submissions. We also considered preliminary 2022 risk transfer results.

## Projected ACA Reinsurance Recoveries Net of Reinsurance Premium (Individual Market Only)

With the expiration of the reinsurance program at the end of the 2016 benefit year, there are no projected reinsurance recoveries or reinsurance premium assumed in the rates.

## MARKET ADJUSTED INDEX RATE

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

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

## WORKSHEET 2: PRODUCT-PLAN DATA COLLECTION

## SECTION I: GENERAL PRODUCT AND PLAN INFORMATION

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

## AV METAL VALUES

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

## SECTION II: EXPERIENCE PERIOD AND CURRENT PLAN LEVEL INFORMATION

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

## SECTION III: PLAN ADJUSTMENT FACTORS

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

## PLAN ADJUSTED INDEX RATE

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

## NON-BENEFIT EXPENSES AND PROFIT \& RISK

## Administrative Expense Load

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

## Profit \& Risk Load/Contribution to Surplus

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

## Taxes and Fees

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

## CALIBRATION

The plan adjusted index rate is projected for all products using the same anticipated age distribution and the mandated age curve. Therefore the consumer adjusted premium rate is the plan adjusted index rate divided by the average age, geographic and tobacco factors for the expected distribution. The average age of the combined individual risk pool population is 42.

The Average Age factor is the reciprocal of the weighted average age factor based on the projected membership. The Tobacco Factor is calculated as the reciprocal of the projected average factor for tobacco users multiplied by the projected tobacco use prevalence.

There is only one geographic rating area for this filing. The geographic rating area factor for this filing is 1.0.

Small differences result between the Calibrated Plan Adjusted Index rates and the Age 21 non-tobacco rates in the Rate Template due to rounding restrictions required in the URRT Part 1.

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

## MEMBERSHIP PROJECTIONS

Enrollment is projected based on current and anticipated enrollment by plan. Items impacting these projections include changes in the size of the market due to guarantee issue requirements and the individual mandate changes. The enrollment is our February 2023 enrollment.

## LOSS RATIO

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

## INDEX RATE

The Index Rate is defined as the EHB portion of projected allowed claims divided by all projected single risk pool lives. The Index Rate is the same value for all non-grandfathered plans for QCC Individual Plans in Pennsylvania. The Index Rate reflects the twelve month projection for calendar year 2023. It has been developed following the specifications of 45 CFR § 156.80(d)(1).

## TERMINATED PLANS

The following plan is being terminated in 2024:

31609PA0190003 Personal Choice PPO Silver

## WORKSHEET 3: RATING AREAS

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

## ACTUARIAL CERTIFICATION

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

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

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

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
















## Cover Page

HIOS Issuer ID: 31609
HIOS Product IDs: 31609PA007, 31609PA019, 31609PA016, 31609PA018
This single PDF file contains four separate actuarial certifications for the unique plan designs under Issuer ID 31609. Please refer to all of the pages contained herein.

# Unique Plan Design Supporting Documentation and Justification 

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 31609
HIOS Product IDs: 31609PA007, 31609PA019
Applicable HIOS Plan IDs (Standard Component): 31609PA0070002, 31609PA0190002, 31609PA0070003, 31609PA0190003, 31609PA0070004, 31609PA0190004, 31609PA0070011, 31609PA0070012, 31609PA0190006

## Purpose of document:

The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning $1 / 1 / 2024$. As prescribed by law, the AV calculation was based on the AV calculator to the full extent possible. The AV is meant to represent the average percent of costs paid by the insurer for a standard population and may vary from actual member experience. The resulting AV was based on prescribed methodology and, therefore, may not reasonably reflect the actuary's estimate of the portion of allowed costs covered by the health insurance plan. The AV was determined based on the plan's benefits and coverage data,the standard population, and utilization and continuance tables published by HHS for purposes of the valuation of AV. This actuarial analysis is not appropriate for any other purposes.

## Reasons the plan design is unique (benefits that are not compatible with the parameters of the AV calculator and the materiality of those benefits):

The cost-sharing for inpatient hospital services for a subset of these plans differs by facility and professionalclaims. Inpatient hospital services account for about $20 \%$ of allowed costs in the AV calculation.

The cost-sharing for laboratory outpatient and professional services for a subset of these plans varies by site of service. Laboratory outpatient and professional services account for about 3\% of allowed costs in the AV calculation.

The outpatient facility fee cost-sharing for a subset of these plans varies by site of service. Services have different copays or coinsurances for a free-standing facility setting and a hospital setting. Outpatient facility fee accounts for about $14 \%$ of allowed costs in the AV calculation.

The cost-sharing for primary care for a subset of these plans is a combination of copays for office visits in person and virtual care. Primary care services account for about $4 \%$ of allowed costs in the AV calculation.

The cost-sharing for specialist care for a subset of these plans is a combination of copays for office visits in person and virtual care. Specialist services account for about $4 \%$ of allowed costs in the AV calculation.

The cost-sharing for occupational and physical therapy for a subset of these plans varies by site
of service. Occupational and physical therapy accounts for about $2 \%$ of allowed costs in the AV calculation.

The cost-sharing for x-rays and diagnostic imaging for a subset of these plans varies by site of service. X-rays and diagnostic imaging accounts for about $4 \%$ of allowed costs in the AV calculation.

The cost-sharing for imaging (CT/PET scans, MRIs) for a subset of these plans varies by site of service. Imaging accounts for about $2 \%$ of allowed costs in the AV calculation.
The cost-sharing for Outpatient Mental Health and Substance Abuse for these plans varies between Office visits and All Other services. Outpatient Mental Health and Substance Abuse accounts for about $2 \%$ of allowed costs in the AV calculation.

The cost-sharing for Generic Drugs for these plans varies between low-cost Generics and normal Generics. Generic Drugs accounts for about 5\% of allowed costs in the AV calculation.

Acceptable alternate method used per 156.135(b)(2) or 156.135(b)(3):
Method $156.135(b)(2)$ was used for inpatient hospital, laboratory site of service, outpatient facility, primary care, specialist care, occupational and physical therapy, x-rays, imaging, outpatient mental health and substance abuse, and generic drugs cost-sharing.

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

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

## Description of the standardized plan population data used:

For the inpatient hospital utilization, we considered our commercial PPO and HMO data incurred between January 2022 and December 2022.
For the freestanding and hospital utilization data for outpatient facility, we considered our commercial PPO and HMO data incurred between January 2022 and December 2022.

For the freestanding and hospital utilization data for laboratory services, we considered our commercial PPO data incurred between January 2022 and December 2022.
For the physical therapy and radiology site-of-service utilization, we considered our commercial PPO data incurred between January 2022 and December 2022.

For the primary care and specialist utilization, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

For the outpatient mental health and substance abuse utilization, we used our commercial PPO data incurred between January 2022 and December 2022. For average cost per unit, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

For the generic drugs utilization, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

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:

## Primary Care Copay Differential

For primary care, our recent data indicated that $80 \%$ of utilization came from office visits in person and $20 \%$ from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

| HIOS_ID | Cost - sharing |  |  |
| :--- | :---: | :---: | :---: |
| PCP | Virtual PCP | AV Input |  |
| 31609PA0070002, 31609PA0190002 | $\$ 30$ | $\$ 20$ | $\$ 28.00$ |
| 31609PA0070003, 31609PA0190003 | $\$ 30$ | $\$ 20$ | $\$ 28.00$ |
| 31609PA0070003-04 | $\$ 30$ | $\$ 20$ | $\$ 28.00$ |
| 31609PA0070003-05 | $\$ 25$ | $\$ 20$ | $\$ 24.00$ |
| 31609PA0070003-06 | $\$ 5$ | $\$ 0$ | $\$ 4.00$ |
| 31609PA0070012, 31609PA0190006 | $\$ 15$ | $\$ 5$ | $\$ 13.00$ |

## Specialist Copay Differential

For specialist visits, our recent data indicated that $95 \%$ of utilization came from office visits in person and 5\% from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

|  | Cost - sharing |  |  |
| :--- | :---: | :---: | :--- |
| HIOS_ID | SP | Virtual SP | AV Input |
| 31609PA0070002, 31609PA0190002 | $\$ 65$ | $\$ 45$ | $\$ 64.00$ |
| 31609PA0070003, 31609PA0190003 | $\$ 75$ | $\$ 50$ | $\$ 73.75$ |
| 31609PA0070003-04 | $\$ 75$ | $\$ 50$ | $\$ 73.75$ |
| 31609PA0070003-05 | $\$ 50$ | $\$ 35$ | $\$ 49.25$ |
| 31609PA0070003-06 | $\$ 10$ | $\$ 5$ | $\$ 9.75$ |
| 31609PA0070012, 31609PA0190006 | $\$ 15$ | $\$ 5$ | $\$ 14.50$ |

## Combination of Copays and Coinsurance for IP Hospital

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

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

The average cost per admit was divided by the average length of stay to calculate the average cost per day. Based on our data, we assumed that $85 \%$ of the cost was from facility claims and the remaining $15 \%$ was from professional claims.

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

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

|  |  |  |
| :--- | ---: | ---: |
|  | 31609PA0070002, | 31609PA0070012, |
| HIOS IDs | 31609PA0190002 | 31609PA0190006 |
| IP Cost Sharing |  |  |
| Facility | $\$ 750$ | $\$ 500$ |
| Professional | $20 \%$ | $20 \%$ |


| AVC Continuance Table | Gold |  | Gold |
| :--- | ---: | :--- | ---: |
| PMPY for IP |  | $\$ 1,577$ |  |
| Admit PMPY | 0.06 |  | $\$ 1,577$ |
| Claim per Admit |  | $\$ 24,919$ |  |
| Average LOS (days) | 4.7 |  | $\$ 24,919$ |
| Effective Copay Factor for 5-days |  | 0.47 |  |


| Assumption from Data |  |  |
| :--- | :--- | :--- |
| \% Facility Cost | $85 \%$ | $85 \%$ |
| \% Professional Cost | $15 \%$ | $15 \%$ |


| Calculations |  |  |
| :--- | ---: | ---: |
| Professional Claim per Admit | $\$ 3,738$ | $\$ 3,738$ |
| Professional Claim per Day | $\$ 788$ | $\$ 788$ |
| Equiv. Copay per Day no max | $\$ 158$ | $\$ 158$ |
| Equiv. Copay per Day, 5-day max | $\$ 338$ | $\$ 338$ |
| Total Copay per Day, 5-day max | $\$ 1,088$ | $\$ 838$ |

## Combination of Coinsurance for IP Hospital

The coinsurance for inpatient hospital facility claims was blended with the coinsurance on professional claims to calculate equivalent coinsurance for inpatient claims. Based on our data, we assumed that $85 \%$ of the cost was from facility claims and the remaining $15 \%$ was from professional claims.

|  |  |  |
| :--- | ---: | ---: |
|  | 31609PA0070003, | 31609PA0070004, |
| HIOS IDs | 31609PA0190003 | 31609PA0190004 |
| Facility | $25 \%$ | $25 \%$ |
| Professional | $30 \%$ | $50 \%$ |
| Blend | $\mathbf{7 4 . 3 \%}$ | $\mathbf{7 1 . 3 \%}$ |

The silver variations, 31609PA0070003-04, 31609PA0070003-05 and 31609PA0070003-06, do not require blending of the facility and professional inpatient coinsurances. In fact, the actual benefit coinsurance amounts were entered directly into the AV calculator.

## Combination of Coinsurance for Laboratory Services

For the lab site of service cost-sharing, our recent data suggested that $15 \%$ of units are at a hospital setting with an average unit cost of $\$ 59.22$, while $85 \%$ of units are at a freestanding setting with an average unit cost of $\$ 22.51$. Taking a weighted average of a $50 \%$ issuer coinsurance applied to $\$ 59.22$ and a $100 \%$ issuer coinsurance applied to $\$ 22.51$ produced an average issuer paid amount of $\$ 23.57$ out of an average cost of $\$ 28.01$, giving an effective issuer coinsurance of $84.1 \%$ which was entered into the AV calculator.

## Combination of Coinsurance for Outpatient Facility Fee

For the outpatient facility site of service cost-sharing, our recent data indicated that $80 \%$ of outpatient facility claims came from the hospital setting. The cost-sharing entered into the AV calculator is a blend of the coinsurance in a hospital setting and the coinsurance in an ambulatory surgery center.

|  | 31609PA0070003, | 31609PA0070011 |
| :--- | ---: | ---: |
| 31609PA0190003 |  |  |
| Hospital | $50.0 \%$ | $40.0 \%$ |
| ASC | $30.0 \%$ | $20.0 \%$ |
| Blend | $\mathbf{5 4 . 0 \%}$ | $\mathbf{6 4 . 0 \%}$ |

The silver variations, 31609PA0070003-04, 31609PA0070003-05 and 31609PA0070003-06, do not require blending of the hospital and ambulatory surgery center coinsurances. In fact, the actual benefit coinsurance amounts were entered directly into the AV calculator.

## Combination of Copays for Outpatient Facility Fee

For the outpatient facility site of service cost-sharing, our recent data indicated that $55 \%$ of outpatient facility utilization came from the hospital setting. The cost-sharing entered into the AV calculator is a blend of the copay in a hospital setting and the copay in an ambulatory surgery center.

|  | 31609PA0070002, | 31609PA0070012, |
| :--- | ---: | ---: |
|  | 31609PA0190002 | 31609PA0190006 |
| Hospital | $\$ 700$ | $\$ 700$ |
| ASC | $\$ 300$ | $\$ 300$ |
| Blend | $\$ 520.00$ | $\$ 520.00$ |

## Occupational and Physical Therapy Site-of-service Differential

For the physical therapy site of service cost-sharing, our recent data indicated that $80 \%$ of utilization came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of the copays at each site.

## X-rays and Diagnostic Imaging Site-of-service Copay Differential

For the x-ray site of service cost-sharing, our recent data indicated that $30 \%$ of utilization came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

## X-rays and Diagnostic Imaging Site-of-service Coinsurance Differential

For the x-ray site of service cost-sharing, our recent data indicated that $30 \%$ of claims came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of coinsurance based on claims at each site.

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

For the imaging site of service cost-sharing, our recent data indicated that $30 \%$ of utilization came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

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

For the imaging site of service cost-sharing, our recent data indicated that $20 \%$ of claims came from the preferred site. The cost-sharing entered into the AV calculator is a weighted average of coinsurance based on claims at each site.

|  |  | Cost-sharing |  |  |
| :---: | :---: | :---: | :---: | :---: |
| HIOS ID | Service Type | Preferred Site | Non-preferred Site | AV Input |
| 31609PA0070002, <br> 31609PA0190002 | Phys. Ther. | \$65 | \$95 | \$71.00 |
|  | X-rays | \$60 | \$90 | \$81.00 |
|  | Imaging | \$120 | \$160 | \$148.00 |
| 31609PA0070003, <br> 31609PA0190003 | Phys. Ther. | \$75 | \$105 | \$81.00 |
|  | X-rays | 30\% | 50\% | 56\% |
|  | Imaging | 30\% | 50\% | 54\% |

## Combination of Cost-sharing for Outpatient Mental Health and Substance Abuse

For the outpatient mental health and substance abuse cost-sharing, our recent data indicated that $75 \%$ of outpatient mental health utilization came from office visits. The cost-sharing entered into the AV calculator is a blend of the cost-sharing for outpatient mental health office visits and the cost-sharing for all other outpatient mental health services. For plans where this cost-sharing is a combination of copay and coinsurance, a separate exhibit has been included to show the development of the effective copay that was used in the AV calculator.

|  | Cost - sharing |  |  |
| :--- | :---: | :---: | :--- |
| HIOS_ID | MH/SA Office | MH/SA Other | AV Input |
| 31609PA0070002, 31609PA0190002 | $\$ 65$ | $\$ 65$ | $\$ 65.00$ |
| 31609PA0070004, 31609PA0190004 | $50 \%$ | $50 \%$ | $50 \%$ |
| 31609PA0070011 | $20 \%$ | $20 \%$ | $80 \%$ |
| 31609PA0070012, 31609PA0190006 | $\$ 15$ | $\$ 45$ | $\$ 22.50$ |

For plans 31609PA0070003 and 31609PA0190003 and the silver variations of plan 31609 PA 0070003 , the cost-sharing for outpatient mental health was input in the AV calculator as an effective copay to capture the blending of a copay for outpatient mental health visits and coinsurance for all other outpatient mental health services. For plans 31609PA0070003 and 31609PA0070003-04, the coinsurance for all other outpatient mental health services was effective after the deductible. Accordingly, the effective copays for these plans were developed to recognize separate costs for when the member was in the deductible. We determined a utilization split for services in the deductible using the plan's deductible value and our CPD model.

|  | $31609 P A 0070003$, <br> $31609 P A 0190003$ |  |
| :--- | ---: | ---: |
|  | $\$ 75$ |  |
| OP Visit Cost-sharing | $75 \%$ | $\$ 75$ |
| OP Visit Weight |  | $75 \%$ |
|  |  | $\$ 241.79$ |
| Avg Cost/Unit OP Other | $100 \%$ | $\$ 241.79$ |
| OP Other Cost-sharing in Deductible | $14 \%$ | $100 \%$ |
| OP Other Weight in Deductible | $30 \%$ | $14 \%$ |
| OP Other Cost-sharing after Deductible | $11 \%$ | $20 \%$ |
| OP Other Weight after Deductible | $\mathbf{\$ 9 7 . 9 3}$ | $11 \%$ |
| Effective Copay (AV Input) | $\$ 95.25$ |  |


|  |  |  |
| :--- | ---: | ---: |
|  | 31609PA0070003-05 | 31609PA0070003-06 |
| OP Visit Cost-sharing | $\$ 50$ | $\$ 10$ |
| OP Visit Weight | $75 \%$ | $75 \%$ |
| Avg Cost/Unit OP Other | $\$ 241.79$ | $\$ 241.79$ |
| OP Other Cost-sharing in Deductible | $\mathrm{N} / \mathrm{A}$ | $\mathrm{N} / \mathrm{A}$ |
| OP Other Weight in Deductible | $\mathrm{N} / \mathrm{A}$ | $\mathrm{N} / \mathrm{A}$ |
| OP Other Cost-sharing after Deductible | $10 \%$ | $10 \%$ |
| OP Other Weight after Deductible | $25 \%$ | $25 \%$ |
| Effective Copay (AV Input) | $\$ 43.54$ | $\$ 13.54$ |

## Generic Drugs Copay Differential

For generic drugs, our recent data indicated that $40 \%$ of utilization came from low-cost generic drugs. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization for low-cost generic drugs and normal generic drugs.

|  | Cost - sharing |  |  |
| :--- | :---: | :---: | :--- |
| HIOS_ID | Low-Cost Generic | Generic | AV Input |
| 31609PA0070002, 31609PA0190002 | $\$ 3$ | $\$ 15$ | $\$$ |

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

Not applicable.

## Certification Language:

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

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

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

## Actuary signature:

Actuary Printed Name: $\qquad$

Date:

AV screenshots redacted.

# Unique Plan Design Supporting Documentation and Justification 

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 31609
HIOS Product IDs: 31609PA016, 31609PA018
Applicable HIOS Plan IDs (Standard Component): 31609PA0160006, 31609PA0180005, 31609PA0180001, 31609PA0160001

## Purpose of document:

The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning $1 / 1 / 2024$. As prescribed by law, the AV calculation was based on the AV calculator to the full extent possible. The AV is meant to represent the average percent of costs paid by the insurer for a standard population and may vary from actual member experience. The resulting AV was based on prescribed methodology and, therefore, may not reasonably reflect the actuary's estimate of the portion of allowed costs covered by the health insurance plan. The AV was determined based on the plan's benefits and coverage data, the standard population, and utilization and continuance tables published by HHS for purposes of the valuation of AV. This actuarial analysis is not appropriate for any other purposes.

## Reasons the plan design is unique (benefits that are not compatible with the parametersof

 the AV calculator and the materiality of those benefits):The cost-sharing for primary care for these plans is a combination of copays for office visits in person and virtual care. Primary care services account for about $4 \%$ of allowed costs in the AV calculation.

The cost-sharing for Outpatient Mental Health and Substance Abuse for these plans varies between Office visits and All Other services. Additionally, the cost-sharing for the first 3 outpatient mental health office visits for these plans is exempt from the deductible. Outpatient Mental Health and Substance Abuse accounts for about $2 \%$ of allowed costs in the AV calculation.

The cost-sharing for Generic Drugs for plans 31609PA0160006 and 31609PA0180005 varies between low-cost Generics and normal Generics. Generic Drugs accounts for about 5\% of allowed costs in the AV calculation.

Acceptable alternate method used per 156.135(b)(2) or 156.135(b)(3):
Method 156.135 (b)(2) was used for the primary care, outpatient mental health and substance abuse, and generic drugs cost-sharing.

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

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

## Description of the standardized plan population data used:

For the primary care and specialist utilization, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

For the outpatient mental health and substance abuse utilization, we used our commercial PPO data incurred between January 2022 and December 2022. For average cost per unit, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

For the generic drugs utilization, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

If the method described in $156.135(b)(2)$ was used, a description of how the benefits were modified to fit the parameters of the AV calculator:

## Combination of Cost-sharing for Outpatient Mental Health and Substance Abuse

For the outpatient mental health and substance abuse cost-sharing, our recent data indicated that $75 \%$ of outpatient mental health utilization came from office visits. The cost-sharing entered into the AV calculator is a blend of the cost-sharing for outpatient mental health office visits and the cost-sharing for all other outpatient mental health services.

For these plans, the cost-sharing for outpatient mental health was input in the AV calculator as an effective copay to capture the fact that the first 3 outpatient mental health visits are exempt from the deductible. The effective copays for these plans were developed to recognize separate costs for when the member was in the deductible. We determined a utilization split for services in the deductible using the plan's deductible value and our CPD model.

Using the bronze continuance table in the Final 2024 AV Calculator, we calculated the average cost per visit for outpatient mental health before the out-of-pocket maximum. This average cost was used as a point estimate of the allowed cost per visit for services before satisfying the out-of-pocket maximum. An effective member copay is calculated by taking a weighted average of $\$ 0$ for the first three visits times the proportion of visits within the first three visits, which according to our experience period between January 2022 and December 2022 for commercial PPO is $11.50 \%$, and the average cost per service from the AV Calculator times the remaining proportion of visits. This effective copay was then used as the cost-sharing for outpatient mental health office visits in our blended outpatient mental health calculation below.

|  | 31609PA0160006, <br> 31609PA0180005 | 31609PA0160001, <br> 31609PA0180001 |
| :--- | ---: | ---: |
| Cost per Visit | $\$ 109.36$ | $\$ 109.36$ |
| Copay for Visits 1-3: | $\$ 0.00$ | $\$ 0.00$ |
| Visits 1-3 Proportion: | $11.50 \%$ |  |
| Eff. Member Copay | $\$ 96.78$ | $11.50 \%$ |


|  | 31609PA0160006, | 31609PA0160001, |
| :--- | ---: | ---: |
| OP Visit Cost-sharing | 31609PA0180005 | 31609PA0180001 |
| OP Visit Weight | $\$ 96.78$ | $\$ 96.78$ |
|  | $75 \%$ | $75 \%$ |
| Avg Cost/Unit OP Other |  |  |
| OP Other Cost-sharing in Deductible | $\mathbf{2 4 1 . 7 9}$ | $\$ 241.79$ |
| OP Other Weight in Deductible | $25 \%$ | $100 \%$ |
| OP Other Cost-sharing after Deductible | $\mathrm{N} / \mathrm{A}$ | $25 \%$ |
| OP Other Weight after Deductible | $\mathrm{N} / \mathrm{A}$ | $\mathrm{N} / \mathrm{A}$ |
| Effective Copay (AV Input) | $\mathbf{\$ 1 3 3 . 0 4}$ | $\mathrm{N} / \mathrm{A}$ |

## Primary Care Copay Differential

For primary care, our recent data indicated that $80 \%$ of utilization came from office visits in person and $20 \%$ from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

|  | Cost - sharing |  |  |
| :---: | :---: | :---: | :---: |
| HIOS_ID | PCP | Virtual PCP | AV Input |
| 31609PA0160006, |  |  |  |
| 31609PA0180005 | $\$ 20$ | $\$ 15$ | $\$ 19.00$ |
| 31609PA0160001, |  |  |  |
| 31609PA0180001 | $\$ 50$ | $\$ 35$ | $\$ 47.00$ |

## Generic Drugs Copay Differential

For generic drugs, our recent data indicated that $40 \%$ of utilization came from low-cost generic drugs. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization for low-cost generic drugs and normal generic drugs.

|  | Cost - sharing |  |  |
| :---: | :---: | :---: | :--- |
| HIOS_ID | Low-Cost Generic | Generic | AV Input |
| 31609PA0160006, 31609PA0180005 | $\$ 3$ | $\$ 25$ | $\$ 16.20$ |

If the method described in $156.135(b)(3)$ was used, a description of the data and method used to develop the adjustments:
Not applicable.

## Certification Language:

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

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

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

## Actuary signature:

Actuary Printed Name:

Date:

AV screenshots redacted.

# Unique Plan Design Supporting Documentation and Justification 

ACTUARIAL MEMORANDUM

HIOS Issuer ID: 31609
HIOS Product IDs: 31609PA016, 31609PA018
Applicable HIOS Plan IDs (Standard Component): 31609PA0160005, 31609PA0180004

## Purpose of document:

The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning $1 / 1 / 2024$. As prescribed by law, the AV calculation was based on the AV calculator to the full extent possible. The AV is meant to represent the average percent of costs paid by the insurer for a standard population and may vary from actual member experience. The resulting AV was based on prescribed methodology and, therefore, may not reasonably reflect the actuary's estimate of the portion of allowed costs covered by the health insurance plan. The AV was determined based on the plan's benefits and coverage data, the standard population, and utilization and continuance tables published by HHS for purposes of the valuation of AV. This actuarial analysis is not appropriate for any other purposes.

Reasons the plan design is unique (benefits that are not compatible with the parameters of the AV calculator and the materiality of those benefits):

The cost-sharing for Outpatient Mental Health and Substance Abuse for these plans varies between Office visits and All Other services. Outpatient Mental Health and Substance Abuse accounts for about $2 \%$ of allowed costs in the AV calculation.

Acceptable alternate method used per 156.135(b)(2) or 156.135(b)(3):
Method 156.135(b)(2) was used for outpatient mental health and substance abuse.

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

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

## Description of the standardized plan population data used:

For the outpatient mental health and substance abuse utilization, we used our commercial PPO data incurred between January 2022 and December 2022. For average cost per unit, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

If the method described in $156.135(b)(2)$ was used, a description of how the benefits were modified to fit the parameters of the AV calculator:

Combination of Cost-sharing for Outpatient Mental Health and Substance Abuse
For the outpatient mental health and substance abuse cost-sharing, our recent data indicated that $75 \%$ of outpatient mental health utilization came from office visits. The cost-sharing entered into the AV calculator is a blend of the cost-sharing for outpatient mental health office visits and the cost-sharing for all other outpatient mental health services.

|  | Cost - sharing |  |  |
| :---: | :---: | :---: | :--- |
| HIOS_ID | MH/SA Office | MH/SA Other | AV Input |
| 31609PA0160005, 31609PA0180004 | $0 \%$ | $0 \%$ | $100 \%$ |

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

Not applicable.

## Certification Language:

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

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

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

## Actuary signature:

$\qquad$

## Actuary Printed Name:

$\qquad$

Date:
8/17/2023

AV screenshots redacted.

# Unique Plan Design Supporting Documentation and Justification 

ACTUARIAL MEMORANDUM
HIOS Issuer ID: 31609
HIOS Product IDs: 31609PA016, 31609PA018
Applicable HIOS Plan IDs (Standard Component): 31609PA0160009, 31609PA0180008
Purpose of document:
The purpose of this document is to provide CMS with a justification of the methods used in calculating the actuarial value for unique plan designs offered in the individual or small group market for the plan year beginning $1 / 1 / 2024$. As prescribed by law, the AV calculation was based on the AV calculator to the full extent possible. The AV is meant to represent the average percent of costs paid by the insurer for a standard population and may vary from actual member experience. The resulting AV was based on prescribed methodology and, therefore, may not reasonably reflect the actuary's estimate of the portion of allowed costs covered by the health insurance plan. The AV was determined based on the plan's benefits and coverage data,the standard population, and utilization and continuance tables published by HHS for purposes of the valuation of AV. This actuarial analysis is not appropriate for any other purposes.

Reasons the plan design is unique (benefits that are not compatible with the parameters of the AV calculator and the materiality of those benefits):

The cost-sharing for primary care for these plans is a combination of copays for office visits in person and virtual care. Primary care services account for about $4 \%$ of allowed costs in the AV calculation.

The cost-sharing for specialist care for a subset of these plans is a combination of copays for office visits in person and virtual care. Specialist services account for about $4 \%$ of allowed costs in the AV calculation.

The cost-sharing for Outpatient Mental Health and Substance Abuse for these plans varies between Office visits and All Other services. Outpatient Mental Health and Substance Abuse accounts for about $2 \%$ of allowed costs in the AV calculation.

The cost-sharing for Generic Drugs for these plans varies between low-cost Generics and normal Generics. Generic Drugs accounts for about 5\% of allowed costs in the AV calculation.
Acceptable alternate method used per 156.135(b)(2) or 156.135(b)(3):
Method $156.135(\mathrm{~b})(2)$ was used for primary care, specialist care, outpatient mental health and substance abuse, and generic drugs cost-sharing.

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

I confirm that only in-network cost-sharing was considered.
Description of the standardized plan population data used:

For the primary care and specialist utilization, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

For the outpatient mental health and substance abuse utilization, we used our commercial PPO data incurred between January 2022 and December 2022. For average cost per unit, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

For the generic drugs utilization and average cost per low-cost generic drug, we used our commercial PPO and HMO data incurred between January 2022 and December 2022.

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:

## Primary Care Copay Differential

For primary care, our recent data indicated that $80 \%$ of utilization came from office visits in person and $20 \%$ from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

|  | Cost - sharing |  |  |
| :---: | :---: | :---: | :---: |
| HIOS_ID | PCP | Virtual PCP | AV Input |
| 31609PA0160009, 31609PA0180008 | $\$ 65$ | $\$ 50$ | $\$ 62.00$ |

## Specialist Copay Differential

For specialist visits, our recent data indicated that $95 \%$ of utilization came from office visits in person and 5\% from virtual care. The cost-sharing entered into the AV calculator is a weighted average of copays based on utilization at each site.

|  | Cost - sharing |  |  |
| :---: | :---: | :---: | :---: |
| HIOS_ID | SP | Virtual SP | AV Input |
| 31609PA0160009, 31609PA0180008 | $\$ 65$ | $\$ 50$ | $\$ 64.25$ |

## Combination of Cost-sharing for Outpatient Mental Health and Substance Abuse

For the outpatient mental health and substance abuse cost-sharing, our recent data indicated that $75 \%$ of outpatient mental health utilization came from office visits. The cost-sharing entered into the AV calculator is a blend of the cost-sharing for outpatient mental health office visits and the cost-sharing for all other outpatient mental health services.

For these plans, the cost-sharing for outpatient mental health was input in the AV calculator as an effective copay to capture the blending of a copay for outpatient mental health visits and coinsurance for all other outpatient mental health services. Additionally, the coinsurance for all other outpatient mental health services was effective after the deductible. Accordingly, the effective copays for these plans were developed to recognize separate costs for when the member was in the deductible. We determined a utilization split for services in the deductible using the plan's deductible value and our CPD model.

|  | 31609PA0160009, <br> 31609PA0180008 |
| :--- | ---: |
| OP Visit Cost-sharing | $\$ 65$ |
| OP Visit Weight | $75 \%$ |
|  |  |
| Avg Cost/Unit OP Other | $\$ 241.79$ |
| OP Other Cost-sharing in Deductible | $100 \%$ |
| OP Other Weight in Deductible | $16 \%$ |
| OP Other Cost-sharing after Deductible | $50 \%$ |
| OP Other Weight after Deductible | $9 \%$ |
| Effective Copay (AV Input) | $\$ 98.07$ |

## Generic Drugs Copay Differential

For generic drugs, our recent data indicated that $40 \%$ of utilization came from low-cost generic drugs. For these plans, the cost-sharing entered into the AV calculator is an effective coinsurance to capture the blending of a copay for low-cost generic drugs and coinsurance for normal generic drugs.

|  | Cost - sharing |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| HIOS_ID | Low-Cost <br> Generic | Generic | Low-Cost <br> Generic Cost | AV Input |
| 31609PA0160009, 31609PA0180008 | $\$ 3$ | $50 \%$ | $\$ 5.13$ | $47 \%$ |

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

Not applicable.

## Certification Language:

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

The analysis was
(iii) conducted by a member of the American Academy of Actuaries; and (iv)performed in accordance with generally accepted actuarial principles and methodologies.

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

## Actuary signature:

## Actuary Printed Name:

Date:

AV screenshots redacted.

A Reinsurance Morbidity Adjustment of 1.000 was used as requested in the guidance.
An Individual Morbidity Adjustment of 1.000 was used as requested in the guidance.
XXXXXXXXXX the impact of COVID in the Experience Period that we do not expect to recur in the Projection Period.

The change in demographics was calculated considering changes to age, geography, and tobacco use.
The change in the average age was measured by comparing the average age factor calculated in this filing, based on February 2021 enrollments, to the average age factor calculated for the prior annual filing.

|  | 2023 | 2024 |  |
| :--- | :---: | :---: | ---: |
|  | Filing | Filing | Change |
| Age Factor | 1.730 | 1.743 | 1.008 |
| Geographic Factor | 1.000 | 1.000 | 1.000 |
| Tobacco Factor | 1.004 | 1.004 | 1.000 |
|  |  |  |  |
| Total change |  |  | 1.008 |

No changes were assumed for this filing.

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

The network factor used for PPO was 1.000.
The network factor used for EPO was 0.950 .

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

Table 10 factors: PPO 1.023
EPO 0.972

## REDACTION JUSTIFICATION - QCC CONSUMER

## DOCUMENT

## URRT Part III - Federal Actuarial Memorandum

Redacted Name of opining actuary (page 8)
Redacted COVID-19 Impact (page 4) - confidential and proprietary information
Redacted Company Contact Information (page 1) - name, telephone number, email address

## PA Actuarial Memorandum

Redacted Name of opining actuary (pages 8 and 9)
Redacted COVID-19 Impact (page 5) - confidential and proprietary information
Redacted Company Contact Information (page 1) - name, telephone number, email address

## PA Actuarial Memo Rate Exhibits

Column C through E in Tabs "II.a. Reins Table - Exp" and "II.b. Reins Table - Proj" - confidential and proprietary information

## Cover Letter

Redacted names and contact information (page 2)

## AV Screenshots

Entire File Redacted

Unique AV Justification file

Redacted name of opining actuary (page 11)
Redacted AV Screenshots (all)

## 2023 and 2024 Service Area <br> Issuer: QCC Insurance Company <br> Market: Individual



[^0]
## Responses to Section E, 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.

We do not project that 2024 membership will differ significantly from the current membership.
2. a. Experience Period Claims: a. Please confirm that all claims which are capitated have been removed from the experience period claims.

We confirm that capitated claims have been removed.
b. Please confirm that all non-EHB claims have been removed from the experience period claims.

We confirm that non-EHB claims have been removed.
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?

We work with our PBM to forecast rx rebate increases from the base period to the rating period. These projected increases are fully reflected in the trend component of the rate development.
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.

We confirm there is no COVID adjustment in Tables 2-4. No COVID adjustment was made in Table 5.
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.

N/A
b. [SG. Only] In Table 5A, if cells K32:M32 are left to equal J32, please explain why that is a reasonable assumption.

N/A
5. Table 6-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 we used a Federal Income Tax rate of 21\% in this calculation.
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 that these factors are consistent.
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.

We confirm that the commission PMPM is consistent between the four options.
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 AV's 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.

Metal AV is a national average AV which is not intended for pricing purposes per CMS Guidance (noted below). Please see attached model for Pricing AV calculation. The metal AV is based on the $A V$ calculator which is calibrated to national average costs. The Philadelphia market is significantly more expensive than the national average from a cost of services standpoint. The same deductible or copay is worth significantly less as a percentage of total allowed cost in the Philadelphia market compared to the national average. This leads to different Pricing AVs for the same metal level.

Pricing based on local data should give a more accurate result than pricing using national data. Our pricing model is using data that is more aligned with of how members buying these plans in this area will use them than another model which relies on national data.

In addition, CMS continues to state that "the AV Calculator is intended to establish a comparison tool and was not developed for pricing purposes" in its Actuarial Calculator Methodology.

This is further supported by the Society of Actuaries paper, "A Summary of the 2020 Actuarial Value Calculator", which states " It is important to remember that the AV calculator was designed to determine if specific benefit designs meet the de minimis criteria and not for plan pricing."

## 7. Expanded Bronze Plans

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

Please see the attached "EBP" exhibit.
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.

The proposed geographic area rating factors shown in Tab $V$ are the same as those used in the previous year.
b. Please provide quantitative and qualitative support for the proposed network factors, if different from the previous year.

The proposed network factors shown in Tab V are the same as those used in the previous year. Within Table 10, they are normalized using the membership in Table 10 to result in a composite factor of 1.000.
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.

We did not make an adjustment for the expiration of the Public Health Emergency.
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?

We did not make an adjustment to morbidity for the expiration of the Public Health Emergency.
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 preventive and covered at 100\%.

Services classified as preventive will be covered at $100 \%$.
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)
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 | Pricing | Actual | Pricing |
| 2019 | $74.1 \%$ | $85.8 \%$ | 466,084 | 492,072 |
| 2020 | $72.2 \%$ | $83.2 \%$ | 468,369 | 505,932 |
| 2021 | $71.3 \%$ | $85.2 \%$ | 497,020 | 498,720 |

11. Plan of Withdrawal:
a. Please confirm that a Plan of Withdrawal has been submitted if any plans are being discontinued.

No withdrawals are proposed in this filing.

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

These plans satisfy the requirements by providing first dollar coverage (before deductible) as follows:

QCC $\quad \frac{\text { HIOS IDs }}{\text { 31609PA0070004, 31609PA0190004 }}$ 31609PA0160006, 31609PA0180005 31609PA0160005, 31609PA0180004 31609PA0160009, 31609PA0180008

## Plan Marketing Name

Personal Choice PPO Bronze
Personal Choice EPO Bronze Basic Personal Choice EPO Bronze Reserve
Personal Choice EPO Bronze Classic

FDC Generic Rx
X
$x$

FDC Primary Care Services HSA Plan
X
X

Issuer Name: QCC Insurance Company, Inc.
Market: Individual PPO
SERFF ID: INAC-133668798

| TOC \# | Description | Completed <br> (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 | 29-36 | Y |
|  | Federal Rates Template | X |  |  |  |
| Summary Documents/Confirmation of HIOS \& SERFF Submissions |  |  |  |  |  |
| A.2.B. | HIOS Submission | X |  |  |  |
| A.2.C. | SERFF Submission | X |  |  |  |
| A.2.D. | SERFF Rate/Rule Schedule Tab | X |  |  |  |
| B. | Cover Letter \& PA Bulletin Information | X |  |  |  |
| PA Actuarial Memorandum and Rate Exhibits |  |  |  |  |  |
| D.1.A. | Company Information | X | Y | 4 | Y |
| D.1.B. | Rate History \& Proposed Variation in Rate Changes | X | N | 5 | N/A |
| D.1.C. | Average Rate Change | X | N | 5 | N/A |
| D.1.D. | Membership Count | X | N | 5 | N/A |
|  | PA Act. Exhibits Table 1 | X | N | 13 | N/A |
| D.1.E. | Benefit Changes | X | N | 5 | N/A |
| D.1.F. | Experience Period Claims \& Premium | X | N | 5-6 | N/A |
|  | PA Act. Exhibits Table 2 | X | N | 13 | N/A |
| D.1.G. | Credibility of Data | X | N | 7 | N/A |
|  | PA Act. Exhibits Tables 2b, 3b, 4b (if applicable) | X | N | 14 | N/A |
| D.1.H. | Trend Identification | X | N | 7 | N/A |
|  | PA Act. Exhibits Table 3 | X | N | 13 | N/A |
| D.1.I. | Historical Experience | X | N | 7 | N/A |
|  | PA Act. Exhibits Table 4 | X | N | 13 | N/A |
| D.2.A. | Development of PAIR, MAIR and Total Allowed Claims | X | N | 8 | N/A |
|  | PA Act. Exhibits Table 5 | X | N | 17 | N/A |
| D.2.B. | Retention Items | X | N | 9-10 | N/A |
|  | PA Act. Exhibits Table 6 | X | N | 17 | N/A |
| D.2.C. | Normalized Market-Adjusted Projected Allowed Total Claims | X | N | 10 | N/A |
|  | PA Act. Exhibits Table 7 | X | N | 17 | N/A |
| D.2.D. | Components of Rate Change | X | N | 10 | N/A |
|  | PA Act. Exhibits Table 8 | X | N | 17 | N/A |
|  | PA Act. Exhibits Table 9 | X | N | 17 | N/A |
| D.3. | Plan Rate Development | X | N | 10-11 | N/A |
|  | PA Act. Exhibits Table 10 | X | N | 18 | N/A |
| D.4. | Plan Premium Development for 21-Year-Old Non-Tobacco User | X | N | 11 | N/A |
|  | PA Act. Exhibits Table 11 | X | N | 19-20 | N/A |
| D.5.A. | Age and Tobacco Factors | X | N | 11 | N/A |
|  | PA Act. Exhibits Table 12 | X | N | 21 | N/A |
| D.5.B. | Geographic Factors | X | N | 11 | N/A |
|  | PA Act. Exhibits Table 13 | X | N | 21 | N/A |
| D.5.C. | Network Factors | X | N | 11 | N/A |
|  | PA Act. Exhibits Table 14 | X | N | 21 | N/A |
| D.5.D | Rate Change Request Summary | X | N | 22 | N/A |
|  | PA Act. Exhibits Table 15 | X | N | 22 | N/A |
| D.5.E. | Service Area Composition | X | N | 11 | N/A |
| D.5.F | Composite Rating | X | N | 11 | N/A |
| D.6. | Actuarial Certifications | X | Y | 11-12 | Y |
| Additional Exhibits |  |  |  |  |  |
| E. | Department Plan Design Summary \& Rate Tables | X | N | 23-25 | N/A |
|  | Service Area Map | X | N | 83 | N/A |
| Summary Documents/Confirmation of HIOS \& SERFF Submissions |  | X |  |  | Y |


[^0]:    Key (modify as needed)
    : On-exchange service area
    Off-exchange only service area

