SERFF Tracking #: CABC-131915046 State Tracking #: CABC-131915046 Company Tracking #: 19-42

State: Pennsylvania Filing Company: Capital Advantage Insurance Company

TOI/Sub-TOI: H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense

Product Name: Rates - CAIC Individual PPO

Project Name/Number: /

Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
07/12/2019		Supporting Document	ACA Public Rate Filing PDF		Ind_19- 42_Initial_CAIC_PPO_PublicFiling0 1_Supporting_20190712.pdf (Superceded) Ind_19- 42_Initial_CAIC_PPO_PublicFiling0 2_Supporting_20190712.pdf (Superceded) Ind_19- 42_Initial_CAIC_PPO_PublicFiling0 3_Supporting_20190712.pdf (Superceded)



May 21, 2019

, Director

Bureau of Life, Accident and Health Insurance Office of Insurance Product Regulation and Administration Commonwealth of Pennsylvania Insurance Department 1311 Strawberry Square Harrisburg, PA 17120

Re: Capital Advantage Insurance Company

Individual Rates Filing No 19-42

TOI Code: H15I Individual Health – Hospital/Surgical/Medical Expense

Sub-TOI Code: H15I.001 - Hospital/Surgical/Medical Expense

Filing Type: Rate

Dear :

By this filing Capital BlueCross, on behalf of its wholly owned subsidiary Capital Advantage Insurance Company, submits to the Department Individual Rates effective January 1, 2020.

The following is a summary of the rate filing:

- Company Name: Capital Advantage Insurance Company (CAIC)
- NAIC: 41203
- Market: Individual
- On/Off Exchange: Off Exchange
- Effective Date: 1/1/2020
- Average Rate Change Requested: -2.3%
- Range of Requested Rate Change: -2.3% to -2.3%
- Total additional annual revenue generated from the proposed rate change: \$(3,706)
- Product: PPO
- Rating Areas: 6,7,9
- Metal Levels: Catastrophic
- Current Covered Lives and Policyholders: 52/47
- 2020 Number of Plans: 1
- 2019 Number of Plans and Change: 1/No Plan Change
- Contract Form #: CAIC-Ind-PPO-C-v0120
- Form Filing SERFF #: CABC-131915200
- Binder SERFF #: CABC-PA20-125092048
- HIOS Issuer ID: 82795
- HIOS Submission Tracking Number: 82795-1473191712519638017

Please note that per instructions from the Insurance Department, 0.06 was added to the morbidity factor.

In support of this filing, I have included an Actuarial Memorandum with supporting exhibits, URRT, Consumer Friendly Justification, Rates Table Template, Rate Change Request Summary, and PA Plan Design Summary and Rate Tables.

If you have any questions regarding this filing, please call me at the control of the control of

Enclosures

cc: , FSA, MAAA, Senior Director, Actuarial Services , ASA, MAAA, Vice President and Chief Actuary, Actuarial Services , Corporate Counsel

Attachment I

Rate Change Summary

Capital Advantage Insurance Company – Individual Plans

Rate request filing ID # CABC-131915046 - This document is prepared by the insurance company submitting the rate filing as a consumer tool to help explain the rate filing. It is not intended to describe or include all factors or information considered in the review process. For more information, see the filing at

http://www.insurance.pa.gov/Consumers/ACARelatedFilings/

Overview

Initial requested average rate change: -2.3%¹
Revised requested average rate change: -3.8%

Range of requested rate change: -3.8% to -3.8% to -3.8% People impacted: 52

Available in: Rating Area 6, Rating Area 7, and Rating Area 9

Key information

Jan. 2018-Dec. 2018 financial experience

Company made (after taxes)	\$101,700
Taxes & fees	\$ 93,040
Administrative expenses	\$ 458,084
Claims	\$ 1,924,633
Premiums	\$ 2,577,457

How it plans to spend your premium

This is how the insurance company plans to spend the premium it collects in 2020:

 Claims:
 72.86%

 Administrative:
 19.99%

 Taxes & fees:
 5.15%

 Profit:
 2.0%

The company expects its annual medical costs to increase 7.88%.

Explanation of requested rate change

Reimplementation of the Health Insurer Fee in 2020 Anticipated increase in facility and physician unit costs Anticipated changes in prescription drug unit costs Continuing change in utilization

¹ Note that insurers will have the opportunity to revise their rate change request in July, after they are scheduled to receive updated information about the impact of a federal program called risk adjustment. This document will be updated accordingly at that time.



July 12, 2019

. Director

Bureau of Life, Accident and Health Insurance Office of Insurance Product Regulation and Administration Commonwealth of Pennsylvania Insurance Department 1311 Strawberry Square Harrisburg, PA 17120

Re: Capital Advantage Insurance Company

Individual Rates Filing No 19-42

TOI Code: H15I Individual Health – Hospital/Surgical/Medical Expense

Sub-TOI Code: H15I.001 - Hospital/Surgical/Medical Expense

Filing Type: Rate

Dear :

By this filing Capital BlueCross, on behalf of its wholly owned subsidiary Capital Advantage Insurance Company, submits to the Department Individual Rates effective January 1, 2020.

The following is a summary of the rate filing:

- Company Name: Capital Advantage Insurance Company (CAIC)
- NAIC: 41203
- Market: Individual
- On/Off Exchange: Off Exchange
- Effective Date: 1/1/2020
- Average Rate Change Requested: -3.8%
- Range of Requested Rate Change: -3.8% to -3.8%
- Total additional annual revenue generated from the proposed rate change: \$(6,073)
- Product: PPO
- Rating Areas: 6,7,9
- Metal Levels: Catastrophic
- Current Covered Lives and Policyholders: 52/47
- 2020 Number of Plans: 1
- 2019 Number of Plans and Change: 1/No Plan Change
- Contract Form #: CAIC-Ind-PPO-C-v0120
- Form Filing SERFF #: CABC-131915200
- Binder SERFF #: CABC-PA20-125092048
- HIOS Issuer ID: 82795
- HIOS Submission Tracking Number: 82795-1473191712519638017

Please note that per instructions from the Insurance Department, 0.06 was added to the morbidity factor.

In support of this filing, I have included an Actuarial Memorandum with supporting exhibits, URRT, Consumer Friendly Justification, Rates Table Template, Rate Change Request Summary, and PA Plan Design Summary and Rate Tables.

If you have any questions regarding this filing, please call me at (or via email at) or at (...). Thank you for your assistance in this matter.

Sincerely,

ASA, MAAA
Manager, Actuarial Services
Capital BlueCross

Enclosures

cc: , FSA, MAAA, Senior Director, Actuarial Services , ASA, MAAA, Vice President and Chief Actuary, Actuarial Services , Corporate Counsel

CAPITAL ADVANTAGE INSURANCE COMPANY, INC.

ACTUARIAL MEMORANDUM Individual Rates Effective January 1, 2020

General Information

Company Information

• Company Legal Name: Capital Advantage Insurance Company – CAIC

• State: PA

HIOS Issuer ID: 82795Market: Individual

• Effective Date: 1/1/2020

PID Company Information

• Company Name: Capital Advantage Insurance Company (CAIC)

• NAIC: 41203

• Market: Individual

• On/Off Exchange: Off Exchange

• Effective Date: 1/1/2020

• Average Rate Change Requested: -3.8%

• Range of Requested Rate Change: -3.8% to -3.8%

• Total additional annual revenue generated from the proposed rate change: \$(6,073)

• Product: PPO

• Rating Areas: 6,7,9

• Metal Levels: Catastrophic

• Current Covered Lives and Policyholders: 52/47

• 2020 Number of Plans: 1

• 2019 Number of Plans and Change: 1/No Plan Change

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• Binder SERFF #: CABC-PA20-125092048

• HIOS Issuer ID: 82795

• HIOS Submission Tracking Number: 82795-1473191712519638017

Company Contact Information

• Primary Contact Name:

• Primary Contact Telephone Number:

• Primary Contact Email Address:

Scope and Purpose

By this filing, Capital Advantage Insurance Company (CAIC), a subsidiary of Capital BlueCross (CBC), submits rates for products to be made available effective January 1, 2020. CAIC will only offer products off the federally-facilitated exchange.

Rate History and Proposed Variations in Rate Changes

Market	Company	Effective Date	SERFF#	Annual Increase
Individual	CAIC	1/1/2016	CABC-130079084	-2.10%
Individual	CAIC	1/1/2017	CABC-130539588	39.00%
Individual	CAIC	1/1/2018	CABC-131022047	20.20%
Individual	CAIC	1/1/2019	CABC-131454888	-43.20%

Average Rate Change

CAIC is proposing an aggregate annual -3.8% rate change. The rate change does vary by plan. The rate change is calculated in PA Rate Template Part III, Table 10, cell AC15.

The key drivers of the rate change, and approximate impact, are as follows:

Reimplementation of the Health Insurer Fee: 3%

Catastrophic plan performance better than forecasted: -15%

Future Cost and Utilization: 8%

Regulatory Considerations

Rates submitted by this filing assume changes to the current regulatory framework. As directed by the Insurance Department, the following factors have been applied to the rates for regulatory changes:

• Individual Mandate: 0.06 added to the morbidity factor.

Membership

Membership is shown in PA Rate Template Part I, Table 1. The average age is 47.

Benefit Changes 2019-2020

A summary of proposed 2020 benefits is included in Exhibit A.

There are several benefit changes being implemented in 2020. All benefit changes comply with the uniform modification of coverage standards described in 45 CFR 147.106(e). Any plan with a benefit change that did not meet the uniform modification of coverage standard was terminated, and a new plan was created in its place. Benefit changes by plan are listed in Exhibit B, highlighted in yellow.

Experience Period Premium and Claims

Single Risk Pool: The data used to develop rates and shown in URRT and PA Rate Exhibits abides by 45 CFR part 156.80(d) single risk pool requirements. The single risk pool reflects all covered lives for every non-grandfathered, non-transitional product/plan combination for CAIC in the individual market.

Base Experience Period: The base experience period (BEP) includes completed fee-for-service paid and incurred claims for dates of service between January 1, 2018 and December 31, 2018.

Paid Through Date: Claims in the BEP are paid through March 31, 2019

Premiums (net of MLR Rebate) in BEP: Premiums are calculated on an earned basis in the BEP. MLR rebate adjustments applied are equal to zero.

Allowed and Incurred Claims in BEP:

- Allowed claims are developed by combining paid claims with member cost-sharing.
 Allowed claims meet the definition in the URR instructions. They do not include provider quality incentive payments.
- Incurred claims are net of HHS CSR payments.
- CBC only covers Essential Health benefits (EHBs).
- CAIC does not include capitated services.
- Allowed and Incurred claims are net of pharmacy rebates. BEP rebates are completed based on actual utilization of rebate-eligible drugs and rebate amounts.

Estimated Incurred but Not Paid Claims: Paid claims by date of service come directly from CBC's data warehouse. The method for calculating incurred claims in the BEP is as follows:

- 1. Historical fee-for-service claims are viewed by date of service and date of payment in a claims triangle.
- 2. The claims triangle payments are then accumulated by date of service to develop factors that represent the rate of accumulation or rate of "completion".
- 3. Historical rates of completion by duration are used to derive projected rates of completion. Some of the methods used to develop projected completion factors are averages (e.g. harmonic averages, time weighted averages, geometric averages) and regression methods. Numerous items are considered when viewing these averages or regression statistics, such as the impact of high claims on perceived completion patterns.

- 4. For durations that exhibit a projected completion factor greater than the Valuation Actuary's chosen threshold (e.g. 80% complete), cumulative paid and incurred claims are divided by the projected completion factor to arrive at ultimate incurred claims. For durations that are less than the chosen threshold, a projection methodology is used. Similar to completion factor development, projection methodologies are worthy of a lengthy discussion. In general, an ultimate incurred claims PMPM is derived by projecting a recent 12-month period to the current month(s) and seasonally adjusting.
- 5. With all months having both a cumulative paid amount and an estimated ultimate incurred amount, the completion factors used in pricing are calculated by taking the quotient of the two. Allowed completion and incurred completion are assumed to be identical.
- 6. Both allowed and paid claims in the BEP are completed by applying completion factors by incurred month developed in Step 6.

$$BEP\ Incurred\ Claims\ =\ \sum rac{BEP\ Paid\ Claims\ by\ Incurred\ Month}{Completion\ by\ Incurred\ Month}$$

BEP Allowed Claims

$$= \sum \frac{BEP\ Paid\ Claims + BEP\ Member\ Cost\ Share\ by\ Incurred\ Month}{Completion\ by\ Incurred\ Month}$$

Risk Adjustment in BEP: Risk adjustment amounts in the BEP are equal to final risk adjustment transfer amounts released on June 28, 2019.

Loss Ratio in BEP: Loss ratio is 74.67%

Credibility of Data

CAIC individual data is not credible, so CBC subsidiary, Keystone Health Plan Central (KHPC) is used as the credibility manual. KHPC data is relevant to CAIC rate development because KHPC offers off-exchange Bronze and Catastrophic plans, similar to CAIC's 2020 product offering.

Trend Identification

Trend: 7.9%

Trend levels reflect CBC's best estimate of changes in utilization, provider reimbursement contracts, the network of facilities and providers, disease management initiatives and the impact of utilization management.

The following is a description of considerations used to determine trend.

- 1. Base Cost/ Change in hospital and physician contracting: The contracted increase in reimbursements to hospitals and physicians is the basis of cost trends. CBC uses the following to project future costs:
 - a. Vendor Physician Cost Model and Internal Hospital Contracting Model

- i. The medical cost models use best estimates of Capital BlueCross (CBC)'s future contracting increases with physicians and hospitals. The models use cost estimates based on varying contract effective dates by physician and hospital. All facilities and providers are considered in this modeling effort (i.e. acute and non-acute, network and non-network, inpatient and outpatient, in- area and out-of-area). From there, a monthly anticipated cost (assuming static utilization) summary is produced which can be used in projecting future claims costs. Cost trends are determined at the CBC book of business level for all commercial business.
- b. Internal Prescription Drug Trend Model
 - i. Price Inflation
 - ii. Contract Pricing
 - iii. Member Cost-Sharing
 - iv. Units per Script
 - v. Brand/Generic Mix
 - vi. Therapeutic Mix
 - vii. Cost per Script
 - viii. Pipeline (new drugs)
- 2. Utilization Considerations:
 - a. Intensity of medical services rendered
 - b. Changes in place of service (e.g. continued migration of inpatient stays to outpatient setting)
 - c. Further migration from brand prescription drugs to generic prescription drugs
 - d. Favorable impacts of value based benefits designs
 - e. Medical utilization estimates reviewed by CBC's Chief Medical Officer
- 3. Leveraging: The trend model is based on allowed cost increases. Paid claims trend at a higher rate than allowed due to leveraging. Leveraging is the impact of static cost-share, such as deductibles and copays, to the paid trend.
- 4. Intensity: Measure of cost increase due to change in treatment sophistication. An example is migration from x-rays to MRIs at significantly higher cost.
- 5. Underwriting Cycle: The underwriting cycle is defined as the tendency to swing between profitable and unprofitable periods over time. The underwriting cycle is exacerbated partly by pricing performed with incomplete information as to the level of current experience trends. A reaction delay occurs, as carriers tend to rely on measurements of past experience in developing current pricing assumptions. As a result, carriers are often increasing their pricing trends when actual experience trends have begun to decline, and decreasing their pricing trends actual trends are increasing. CBC strives to mitigate the underwriting cycle by keeping trends consistent through times of increasing and decreasing claim cost and utilization.

Historical Experience: Historical experience was not used to the develop trend.

Benefit Categories: Claims in the benefit categories displayed in URRT come directly from CBC's data warehouse. These same categories are used to develop category-level trend. See Exhibit C for a description of benefits by benefit category.

See Exhibit E for CAIC's pricing trend, as well as cost and utilization components of the pricing trend.

Rate Development & Change

Projection Factors

Changes in Morbidity: Found in URRT Worksheet 1, "Morbidity Adjustment", and PA Rate Exhibits, Table 5. The changes to morbidity is equal to the Department's Individual Adjustment factor discussed above.

Changes in Benefits: Benefit changes are not applied to allowed claims as allowed should stay consistent from 2018 to 2020. Benefit changes are applied in the development of future incurred claims, due to changes in member cost-share. This calculation is shown in Exhibit D, and applied in Exhibit G. The manual cost PMPMs are developed from CBC's internal benefit relativity model, discussed in the Plan Adjusted Index Rate section below. The benefit change is equal to member-month weighted average projected manual PMPM divided by member-month weighted average manual PMPM in the BEP. This process is further discussed in the Paid-to-Allowed section below.

Changes in Demographics: CAIC does not expect changes in demographics in its individual population.

Changes in Network: No network adjustment is applied.

Other Adjustments: No other adjustment is applied.

Benefits, Demographics, Network and Other adjustments are found in URRT Worksheet 1 and PA Rate Exhibits Table 5.

Index Rate

The experience period index rate is CAIC's allowed claims PMPM, set in accordance with the single risk pool provision. All CAIC covered benefits are categorized as Essential Health Benefits (EHBs), therefore no adjustment was made to the experience period index.

Projected Allowed Claims: The CAIC experience period allowed claims, benefit-adjusted, trended to the projection period (See <u>Projection Factors</u> section above), and credibility adjusted, is the *Projected Allowed Claims at Current Benefits*. This number is reflected in Worksheet 1 of URRT ("Projected Allowed Experience Claims PMPM (w/ applied credibility if applicable)").

To calculate the projected index rate:

- 1. Start with Projected Allowed Claims at Current Benefits
- 2. The *Projected Allowed Claims at Current Benefits* reflect EHBs 100 percent, so no adjustment needs to be made to add EHBs and remove non-EHB claim cost. This is the index rate for individuals renewing January December.

See Exhibit J for the Index Rate.

Paid to Allowed Ratio

CAIC used the prescribed URRT allowed claim rate development methodology in conjunction with a paid and incurred rate development methodology to determine final premium rates. URRT projects allowed claims, and uses a paid-to-allowed ratio in order to adjust allowed claims to paid levels. This value is then used to develop premiums. In order to determine the paid-to-allowed ratio, CAIC projected paid and incurred claims, adjusted for benefits, to the experience period.

Projected Paid and Incurred Claims are calculated as follows:

- 1. Gather claims experience as described in the Data section above.
 - a. Base Experience Period (BEP) Paid Claims, Capitation, and Rx Rebates
 - b. BEP Member Months
- 2. Develop BEP Paid and Incurred Claims:

BEP Paid and Incurred Claims =
$$\frac{BEP \ Paid \ Claims}{Completion \ Factor}$$

The development of completion factors is described in <u>Experience Period Premium</u> and Claims above.

3. Develop the BEP Paid and Incurred Claim PMPM:

$$BEP\ Paid\ and\ Incurred\ Claim\ PMPM = \frac{BEP\ Paid\ and\ Incurred\ Claims}{BEP\ Member\ Months}$$

4. Develop *Trended Claim PMPM*: Using the aggregate trend described in the <u>Projection Factors</u> section above, trend the BEP Paid and Incurred Claim PMPM from the midpoint of the experience period to the midpoint of the rating period.

Trended Claim PMPM

=
$$[BEP\ Paid\ and\ Incurred\ Claim\ PMPM] \times (1 + [Trend\%])^{Trend\ Months/12}$$

5. Develop *Projected Paid and Incurred Claim PMPM*:

 $Projected \ Paid \ and \ Incurred \ Claims \ PMPM \\ = [Trended \ Claim \ PMPM] \times [Benefit \ Adjustment] \\ \times [Morbidity \ Adjustment] \times [Other \ Adjustment]$

The *Benefit Adjustment*, *Morbidity Adjustment*, and *Other Adjustment* are discussed in the Projections Factors section above.

- 6. Develop *Projected Claims PMPM by Benefit* as follows:
 - a. CAIC uses an actuarial cost model to measure the impact of cost-sharing designs on cost and utilization amounts by service category. The cost model shows frequency per 1,000 per year by type of service (IP, OP, Professional), and allowed cost per service for each of the same types of service, normalized to a \$0 office visit copayment and a \$25 ER copayment. Given a particular benefit design (for example, \$20 office visit copayment), utilization is adjusted from the benchmark based on assumed utilization change factors, and cost per service is reduced by the copayment or coinsurance per service. Cost and utilization are multiplied together to derive a PMPM by service, summed for all services. The impact of global deductible, coinsurance, and out-of-pocket max is then measured based on cumulative probability distributions (CPDs), where the value of services that apply to the CPDs adjusts the level of the curve, as well as global utilization adjustments.
 - b. This actuarial cost model derives a Manual Cost for each benefit design in the experience period, as well as plans being offered in the projection period. The average Manual Cost of the experience is compared to the Manual Cost of the base plan. The projected experience period data is then adjusted to the base plan:

$$Benefit\ Level\ Adjustment = rac{Average\ Manual\ Cost\ in\ Projection\ Period\ Manual\ Cost\ of\ Base\ Plan}{Manual\ Cost\ of\ Base\ Plan}$$

c. The *Projected Paid and Incurred Claim PMPM* (Step 5) is then adjusted to the Base Plan as follows:

$$Base\ Plan\ Paid\ and\ Incurred\ Claims\ PMPM \\ = \frac{Benefit\ Adjusted\ Paid\ and\ Incurred\ Claims\ PMPM}{Benefit\ Level\ Adjustment}$$

d. Each additional benefit design has its own unique Manual Cost, which can then be compared to the Base Plan to develop a Benefit Relativity:

$$Benefit \ Relativity \ A = \frac{Manual \ Cost \ of \ Benefit \ A}{Manual \ Cost \ of \ Base \ Plan}$$

- e. The Benefit Relativity developed in d. above is then used as a gauge to develop a final *Pricing Relativity*. This pricing relativity is developed using actuarial judgment including the following considerations:
 - i. Final premium relativities must make sense based on benefits. For example, the annual cost difference between a PPO 2000 and PPO 1000 must be less than \$1000.
 - ii. Adjustments for plan designs that fall outside of the actuarial cost model.
- a. So the Projected Claims PMPM by Benefit is:

Projected Claims PMPM Benefit A
= Projected Claims PMPM Base Plan
× Pricing Relativity A

- b. And to arrive at the *Total Projected Claims PMPM*, CAIC assumes a distribution of members across the benefit plans being offered in 2019. The *Total Projected Claims PMPM*:
- = Projected Claims PMPM Benefit $A \times Expected$ Member Dist of Benefit A + Projected Claims PMPM Benefit $B \times Expected$ Member Dis of Benefit $B + \cdots$
- 7. The Paid-To-Allowed Ratio is then:

 $\textit{Paid to Allowed Ratio} = \frac{\textit{Total Projected Claims PMPM}}{\textit{Projected Allowed Claims at Current Benefits}}$

See Exhibit G for the development of the *Paid-to-Allowed Ratio*. And see Exhibit L for the plan-level projected incurred amount development.

Risk Adjustment

Projected Risk Adjustments PMPM:

Relevant to 2020 pricing is the impact of Commercial Risk Adjustment (CRA) payment transfers that are expected to be earned in 2020. The following items are those that we deem important in generating a CRA payment transfer adjustment:

- 1. Risk profile of the those enrolled in CRA eligible plans for the market or state (i.e. competitors) relative to risk profile of CRA eligible membership enrolled in our plans
- 2. Statewide average premiums
- 3. Current market penetration of this company and competitors in the market and in the state
- 4. 2016-2017 risk adjustment results

5. Market improvement in coding risk: CBC's ACA book of business has had a churn rate that makes a multi-year perspective of member diagnosis and risk very challenging. Because closing gaps in care and coding, and a myriad of other risk adjustment functions require more than a single year of data to facilitate an accurate depiction of risk, it is believed that CBC is disadvantaged in the market. This will drive CBC's relative risk to the market down over time.

Market Adjusted Index Rate

The Market Adjusted Index Rate is calculated as the Index Rate adjusted for all allowable market-wide modifiers defined in the market rating rules, 45 CFR Part 156.80(d)(1). So,

[Market Adjusted Index Rate]

- $= ([Index\ Rate]\ x\ [Paid\ to\ Allowed\ Ratio]$
- [Net Projected ACA Reinsurace Recoveries]
- [Net Projected Risk Adjustments PMPM] + [Exchange Fees PMPM])
- ÷ [Paid to Allowed Ratio]

See Exhibit K for the development of the Market Adjusted Index Rate.

Retention Items

Administrative Expense Load:

- 1. Risk Adjustment User Fee: To fund the HHS-risk adjustment program, issuers will remit to HHS a fee of \$0.18 PMPM. The Risk Adjustment Fee PMPM is included in URRT Worksheet 1, URRT Worksheet 2, "Administrative Expense", and PA Rate Exhibits Table 6.
- 2. Administrative Expense: Calculated using an allocation method from CBC's Finance department, and trended to the rating period. Costs are allocated according to results reported through a company-wide questionnaire. On an annual basis, each cost center within the company completes a questionnaire listing the distribution of costs (in percentage terms) by product as well as by market segment. For example, the questionnaire will ask what percentage of time is spent on PPO versus HMO versus Drug versus Medicare. And separately will ask what percentage of time is spent on large group, small group, individual, and government programs. Using those distributions, all costs needed to perform the business are allocated to the proper market segments and lines of business. The administrative expense applied in the rate development is the total expense allocated to CBC individual products. Administrative expenses are included in URRT Worksheet 2, "Administrative Expense", and PA Rate Exhibits Table 6. Expense as a percentage of premium vary by plan because a fixed dollar admin PMPM is applied to each plan.
- 3. Broker Expense: Calculated based on CBC's explicit per contract broker fee. Broker Expense is included in URRT Worksheet 2, "Administrative Expense", and PA Rate Exhibits Table 6. CBC pays commissions for new business and renewal enrollment received during open enrollment, both on and off exchange, and in all geographic

areas. Commission is less on catastrophic plans due to the lower premium. CBC does not pay commission during Special Enrollment Periods (SEP). The 2020 broker commission schedule is yet to be finalized. Attached please find the 1/1/2019 copy of the broker agreement – redacted version. Files are as follows:

- a. Redacted Agent Agreement: "Ind_19 41 Initial CAIC PPO WBEBrokerIndRedacted Supporting 20190521.pdf"
- b. Redacted Preferred Producer Master Agreement: "Ind_19-41_Initial_CAIC_PPO_PPMABrokerIndRedacted_Supporting_20190521.pdf"
- 4. Value-Based Benefits (VBB): Standard with each plan, Capital BlueCross includes wellness incentives to maximize the likelihood that consumers make positive behavioral changes, which lead to better health, and curbed health care costs for employers and employees alike. The incentive is as follows:
 - a. Complete Health Risk Assessment questionnaire and receive a gift card.
 - b. Participate in an online coaching program and receive a gift card reward.
 - c. The wellness program is administered through a vendor and costs are based on vendor fees, anticipated participation, and reward card amounts.
 - d. Fees are included in overall administrative expense fee discussed above.
 - e. Included in URRT Worksheet 2 "Administrative Expense", and PA Rate Exhibits Table 6.
- 5. Identity Theft Coverage: Identity protection offering will include the following components:
 - a. Credit monitoring Monitors activity that may affect credit
 - b. Fraud detection Identifies potentially fraudulent use of identity or credit
 - c. Fraud resolution support Assists members in addressing issues that arise in relation to credit monitoring and fraud detection
 - d. Included in URRT Worksheet 1, "Administrative Load", and PA Rate Exhibits Table 6.
- 6. Additional Quality Improvement: The Final Notice of Benefit and Payment Parameters (NBPP) for 2020 finalized the rule to allow issuers to apply a standard 0.8% of premium for quality improvement (QI) measures in the MLR calculation. Additional QI amounts applied in rating equal 0.4%. Included in URRT Worksheet 2, "Administrative Expense", and PA Rate Exhibits Table 6.

Profit (or Contribution to Surplus) & Risk Margin:

7. Contingency: Contingency is included in URRT Worksheet 1, "Profit and Risk", and PA Rate Exhibits Table 6.

Taxes and Fees:

1. Health Insurer Fee (HIF) – Section 9010 of PPACA and Section 1406 of the Reconciliation Act (which modified PPACA) refer to HIF. The fee is a fixed-dollar amount distributed across health insurance providers: \$8 billion in 2014, \$11.3 billion in 2015 and 2016, \$13.9 billion in 2017, \$14.3 billion in 2018, and the HIF increases by the rate of premium growth for 2019 and subsequent years. There was a moratorium on the

- fee for 2017 and there is a suspension on the fee for 2019. HIF is included in URRT Worksheet 2, "Taxes and Fees", and PA Rate Exhibits, Table 6.
- 2. Exchange Fee All issuers participating in a federally-facilitated exchange will remit 3% of premium to HHS. The exchange user fee is applied as an adjustment to the Index Rate at the market level. CAIC only offers off-exchanges products, therefore no exchange fee is applied.
- 3. Federal Income Tax: Federal Income Tax will be collected on the 2% contingency built into the premium. The projected Federal Income Tax is included in URRT Worksheet 2, "Taxes and Fees", and PA Rate Exhibits, Table 6.
- 4. Premium Tax: CAIC is charged premium tax of 2%. Premium tax is included in URRT, Worksheet2, "Taxes and Fees" and PA Rate Exhibits, Table 6.

See Exhibit H for all retention values.

Plan Rate Development

The Plan Adjusted Index Rates are included in Worksheet 2, Section IV of URRT.

The following adjustments were used to derive the Plan Adjusted Index Rate:

- 1. Actuarial Value and Cost Sharing adjustment: The Actuarial Value and Cost Sharing Adjustment is determined using CAIC's actuarial cost model. CAIC uses an actuarial cost model to measure the impact of cost-sharing designs on cost and utilization amounts by service category. The cost model shows frequency per 1,000 per year by type of service (IP, OP, Professional), and allowed cost per service for each of the same types of service, normalized to a \$0 office visit copayment and a \$25 ER copayment. Given a particular benefit design (for example, \$20 office visit copayment), utilization is adjusted from the benchmark based on assumed utilization change factors, and cost per service is reduced by the copayment or coinsurance per service. Cost and utilization are multiplied together to derive a claim PMPM by service, summed for all services. The impact of global deductible, coinsurance, and out-of-pocket max is then measured based on CPDs, where the value of services that apply to the CPDs adjusts the level of the curve, as well as global utilization adjustments.
- 2. Induced Demand: Please see Table 8
- 3. Provider Network: The Provider network is the same across all PPO plans. A network factor is applied to adjust HMO base data to PPO (1.6% for OON medical benefits).
- 4. Adjustment for benefits in addition to EHBs: No benefits other than EHBs are included in the plans, so no adjustment is necessary.
- 5. Catastrophic Plans: Applied to catastrophic plans to reflect lower morbidity.
- 6. Adjustment for distribution and administrative costs: Described in <u>Retention</u> section above.
- 7. Tobacco Adjustment: Calculated as the average tobacco factor applied across the risk pool.

The development of the Plan Adjusted Index rate is found in Exhibit L, and summarized in Exhibit M.

Plan Premium Development for 21-Year-Old Non-Tobacco User

Age Curve Calibration: The average age factor is calculated by taking the member-weighted average of current individual enrollment by age in CAIC. Age factors are applied in accordance with CMS's Standard Age Curve. The age calibration factor is adjusted for contracts with greater than three children under the age of 21. Please see file Ind_19-42_Initial_CAIC_PPO_List-Billed_Supporting_20190521 for the calculation.

Geographic Factor Calibration: The average geographic rating factor is calculated by taking the CAIC member-weighted average by region.

Geographic Factors: CBC performed regional analysis to quantify the cost difference between the three regions in our service area. The analysis gathered incurred claims net Rx rebates, projected risk adjustment, and premium for a 12-month period by region. The loss ratio of each region is then compared to the average loss ratio for the book of business. In theory, the change in regional rating factor is:

```
[Change in Regional Rating Factor Region A] = [Region A LR] \div [BOB LR]
```

But our preferred approach is to gradually change factors, so not to shock the market, while moving rates in the appropriate direction. In order to do this, the following approach is being proposed:

```
[Change in Regional Rating Factor Region A] = [Region A LR] \div [Target LR]
```

Where Target LR is in between Region A LR and BOB LR. With this gradual approach, annual rate change by region is shown on Exhibit Q, column G.

Tobacco Factor Calibration: Average tobacco factor is calculated using current month member by smoking status data.

The calibration is:

```
[Calibrated Plan Adjusted Index Rate] = [Plan Adjusted Index Rate] \div ([Age Curve Calibration] \times [Geographic Factor Calibration] \times [Tobacco Factor])
```

Calibrated Plan Adjusted Index Rates are found on PA Rate Exhibits Table 10. The calibration factors and development are found on Exhibit N.

Consumer Adjusted Premium Rate Development

The Consumer Adjusted Premium Rate is developed as follows:

1. Member-Level Consumer Adjusted Premium Rate:

```
[Member - Level Consumer Adjusted Premium Rate] \\ = [Calibrated Plan Adjusted Index Rate] \times [Age Factor] \\ \times [Geographic Factor] \times [Tobacco Factor]
```

[Family Consumer Adjusted Premium Rate] = ∑[Member –
 Level Consumer Adjusted Premium Rate]
 With no more than three child dependents under age 21 taken into account

All consumer-level adjustments are applied uniformly to all plans in the Single Risk Pool. These adjustments do not vary by plan. Age and Geographic factors are displayed in Exhibits O.

Base Rates, i.e. Calibrated Plan Adjusted Index Rates, are found on Exhibit P.

AV Metal Values

The AV Metal Values included in URRT Worksheet 2 and PA Rate Exhibits, Table 10 were based on the federally issued AV Calculator.

See AV Screenshots included with the submission.

AV Pricing Values

All AV Pricing values were developed using CAIC's actuarial cost model and actuarial judgment as described in section Paid to Allowed above. Differences in health status are not included.

Projected Loss Ratio

See Exhibit I for the projected loss ratio calculation. The projected loss ratio is calculated using the federally prescribed MLR methodology.

Membership Projection

The membership projections found in Worksheet 2 of URRT were developed by assuming moderate growth and similar distribution to current.

Attachments and Examples

The following is a list of Exhibits and Data to support this filing:

PA Rate Exhibits Part I through Part V

Table 8

Exhibit A – Benefit Summary

Exhibit B – Benefit Change Summary

Exhibit C – Benefit Categories

Exhibit D – Benefit Mix

Exhibit E – Trend

Exhibit F – URRT

Exhibit G – Paid-to-Allowed Development

Exhibit H – Retention

Exhibit I – Projected Loss Ratio

Exhibit J – Index Rate

Exhibit K – Market Adjusted Index Rate

Exhibit L – Rate Development by Plan

Exhibit M – Plan Adjusted Index Rates

Exhibit N – Calibration

Exhibit O – Rating Factors

Exhibit P – Quarterly Base Rates

Exhibit Q – Regional Analysis

Broker Contracts
Actuarial Value Screenshots
List-Billed Data

Actuarial Statement

I, ASA, MAAA, am of the opinion that this filing is in compliance with the applicable Federal and State Laws and Regulations concerning the Patient Protection and Affordable Care Act and the Health Care and Education Reconciliation Act of 2010.

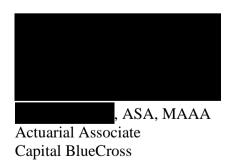
I, ASA, MAAA, do hereby certify that:

- 1. This filing has been prepared in accordance with the following:
 - a. Actuarial Standard of Practice No. 5, "Health and Disability Claims"
 - b. Actuarial Standard of Practice No. 8, "Regulatory Filings for Rates and Financial Projections for Health Plans"
 - c. Actuarial Standard of Practice No. 12, "Risk Classification"
 - d. Actuarial Standard of Practice No. 23, "Data Quality"
 - e. Actuarial Standard of Practice No. 25, "Credibility Procedures Applicable to Accident and Health, Group Term Life, and Property/Casualty Coverage"
 - f. Actuarial Standard of Practice No. 26, "Compliance with Statutory and Regulatory Requirements for the Actuarial Certification of Small Employer Health Benefit Plans"
 - g. Actuarial Standard of Practice No. 41, "Actuarial Communications".

2. The index rate is:

- a. Projected in compliance with all applicable state and federal statutes and regulations (45 CFR 156.80(d) (1)).
- b. Developed in compliance with the applicable Actuarial Standards of Practice.

- c. Reasonable in relation to the benefits provided and the population anticipated to be covered.
- d. Neither excessive nor deficient.
- e. Adjusted by only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) to generate plan level rates.
- 3. The percent of total premium that represents essential health benefits were calculated in accordance with actuarial standards of practice.
- 4. 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, and in accordance with CFR 156.135(b)(2) as necessary. For any plan requiring an alternative method, 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 benefits that deviate substantially from the parameters of the AVC and have a material impact on the actuarial value.
 - a. The analysis was
 - i. conducted by a member of the American Academy of Actuaries, and
 - ii. performed in accordance with generally accepted actuarial principles and methods.
- 5. Geographic area rating factors reflect only differences in the costs of delivery and not differences due to population morbidity.
- 6. All factor, benefit and other changes from the prior approved filing have been disclosed in the actuarial memorandum.
- 7. New plans cannot be considered modifications of existing plans under the uniform modification standards in 45 CFR 147.106.
- 8. The information presented in the PA Actuarial Memorandum and PA Actuarial Memorandum Rate Exhibits is consistent with the information presented in the Rate Filing Justification.



PA Rate Template Part I Data Relevant to the Rate Filing

Table 0. Identifying Information

Carrier Name:	Capital Advantage Insurance Company
	Capital Advantage insulance Company
Product(s):	PPO
Market Segment:	Individual
Rate Effective Date:	1/1/2020 to
Base Period Start Date	1/1/2018 to
Date of Most Recent Membership	2/1/2019

12/31/2020 12/31/2018

Table 1. Number of Members

	Member-months	Members	Member-months
	Experience Period	Current Period (as of 02-01-2019)	Projected Rating Period
Average Age	47.3	21.8	21.8
Total	2,825	52	752
<18	262	11	159
18-24	126	12	174
25-29	72	29	419
30-34	126	0	0
35-39	154	0	0
40-44	167	0	0
45-49	178	0	0
50-54	412	0	0
55-59	488	0	0
60-63	528	0	0
64+	312	0	0

Table 2. Experience Period Claims and Premiums

Earned Premium	Paid Claims	Ultimate Incurred Claims	Member Months	Estimated Cost Sharing (Member & HHS)	Allowed Claims (Non-Capitated)	Non-EHB portion of Allowed Claims	Total Prescription Drug Rebates*	Total EHB Capitation	Total Non-EHB Capitation	Estimated Risk Adjustment
\$2,452,839.38	\$1,960,509.43	\$1,978,839.47	2,825	\$496,744.48	\$2,475,583.95	\$0.00	(\$54,206.52)	\$0.00	\$0.00	\$124,617.90
Experience Period Total Allowed EHB Claims + EHB Capitation PMPM (net of prescription drug rebates)									\$ 857.12	

Table 3. Trend Components

Service Category	Cost*	Utilization*	Induced Demand*	Composite Trend	Weight*
Inpatient Hospital	6.00%	2.30%	0.00%	8.44%	18.98%
Outpatient Hospital	5.65%	2.30%	0.00%	8.08%	39.36%
Professional	3.85%	1.80%	0.00%	5.72%	16.98%
Other Medical	5.65%	2.00%	0.00%	7.76%	3.41%
Capitation				3.00%	3.20%
Prescription Drugs	8.80%	0.85%	0.00%	9.72%	18.07%
Total Annual Trend				7.88%	100.00%
Months of Trend				24	
Total Applied Trend Projection Factor				1.164	
* Express Cost, Utilization, Induced Utilization and Weight as perce	entages	•		•	•
** Should = URRT Trend					

Table 4. Historical Experience

Month-Year	Total Annual Premium	Incurred Claims	Completion Factors*	Ultimate Incurred Claims	Members	Ultimate Incurred PMPM	Estimated Annual Cost Sharing (Member + HHS)	Prescription Drug Rebates**	Allowed Claims (Net of Prescription Drug Rebates)	Allowed PMPM
Jan-15		\$516.00	1.0000	\$ 516.00		#DIV/0!	(manuar : may	(\$1.766.34)	(\$1.250.34)	#DIV/0!
Feb-15		\$360.00	1.0000	\$ 360.00		#DIV/0!		\$0.00	\$360.00	#DIV/01
Mar-15		\$264.00	1.0000	\$ 264.00		#DIV/0!		\$1.859.75	\$2,123,75	#DIV/01
Apr-15		\$216.00	1.0000	\$ 216.00		#DIV/0!		\$0.00	\$216.00	#DIV/01
May-15		\$156.00	1.0000	\$ 156.00		#DIV/0!		\$0.00	\$156.00	#DIV/01
Jun-15		\$156.00	1.0000	\$ 156.00		#DIV/0!		\$0.00	\$156.00	#DIV/0!
Jul-15		\$132.00	1.0000	\$ 132.00		#DIV/0!		\$0.00	\$132.00	#DIV/01
Aug-15		\$84.00	1.0000	\$ 84.00		#DIV/0!		\$0.00	\$84.00	#DIV/0!
Sep-15		\$84.00	1.0000	\$ 84.00		#DIV/0!		\$0.00	\$84.00	#DIV/0!
Oct-15		\$168.00	1.0000	\$ 168.00	-	#DIV/01		\$0.00	\$168.00	#DIV/01
Nov-15		\$48.00	1.0000	\$ 48.00		#DIV/0!		\$0.00	\$48.00	#DIV/0!
Dec-15	\$0.00	\$48.00	1.0000	\$ 48.00		#DIV/0!	\$0.00	\$0.00	\$48.00	#DIV/0!
Jan-16		\$120.20	1.0000	\$ 120.20	10	\$ 12.02		(\$0.73)	\$614.97	\$ 61.50
Feb-16		\$681.09	1.0000	\$ 681.09	10			(\$0.37)	\$1,222.59	\$ 122.26
Mar-16		\$60.00	1.0000	\$ 60.00	14	\$ 4.29		(\$67.60)	\$3.29	\$ 0.24
Apr-16		\$99.65	1.0000	\$ 99.65	14			(\$0.37)	\$227.82	\$ 16.27
May-16		\$12.00	1.0000	\$ 12.00	14			\$0.00	\$20.72	\$ 1.48
Jun-16		\$742.28	0.9991	\$ 742.92	14	\$ 53.07		\$9.53	\$1,237.88	\$ 88.42
Jul-16		\$925.74	0.9962	\$ 929.28	12			\$0.00	\$2,440.44	\$ 203.37
Aug-16		\$2,046.24	0.9999	\$ 2,046.36	12			\$0.00	\$2,394.93	\$ 199.58
Sep-16		\$342.91	1.0000	\$ 342.91	14			\$114.10	\$722.71	\$ 51.62
Oct-16		\$702.64	1.0000	\$ 702.64	15			\$0.00	\$1,059.70	\$ 70.65
Nov-16		\$435.17	1.0000		15			\$0.00	\$1,333.34	\$ 88.89
Dec-16	\$74,955,52	\$405.98	1.0000	\$ 405.97	16		\$7.396.90	\$0.00	\$2,751.27	\$ 171.95
Jan-17		\$96,004.32	1.0000		164			(\$997.93)	\$114,751.04	
Feb-17		\$183,415.56	1.0000	\$ 183,415.57	167	\$ 1,098.30		(\$659.41)	\$193,152.82	\$ 1,156.60
Mar-17		\$269,011.47	1.0000	\$ 269,011.67	170	\$ 1,582.42		(\$810.47)	\$285,346.22	\$ 1,678.51
Apr-17		\$24,352.95	1.0000	\$ 24,353.06	159	\$ 153.16		(\$737.26)	\$41,955.23	\$ 263.87
May-17		\$32,295.29	1.0000	\$ 32,295.65		\$ 205.70		(\$1,423.66)	\$48,967.51	\$ 311.89
Jun-17		\$41,261.48	1.0000	\$ 41,262.20	150			(\$1,064.38)	\$58,817.24	
Jul-17		\$35.928.26	1.0000	\$ 35.929.03	148			(\$1.217.70)	\$48.874.53	\$ 330.23
Aug-17		\$21,891.35	1.0000		141	\$ 155.26		(\$1,219.46)	\$28,997.26	\$ 205.65
Sep-17		\$69,608.33	1.0000	\$ 69,611.29	142	\$ 490.22		(\$991.31)	\$83,024.33	\$ 584.68 \$ 232.10
0ct-17		\$19,006.24 \$18,942.39	1.0000	\$ 19,006.53 \$ 18,943.09	142	\$ 133.85		(\$990.58) (\$867.36)	\$32,958.29 \$31,185,33	\$ 232.10
Nov-17 Dec-17		\$18,942.39 \$27,692.80	1.0000		144	\$ 131.55 \$ 209.81		(\$867.36) (\$1.234.42)	\$31,185.33 \$38,923,97	\$ 216.56 \$ 294.88
	\$1.129.039.72	\$27,692.80	0.9999		255		\$179,748,24	(\$1,234.42)	\$38,923.97	\$ 785.85
Jan-18		\$133,315.46	0.9998					(\$3,236.84) (\$2,985.24)	\$200,392.75	
Feb-18 Mar-18		\$90,055.49 \$105.189.54	0.9993	\$ 90,116.42 \$ 105,291.65	256			(\$2,985.24) (\$4.181.16)	\$138,003.45 \$141,734.80	\$ 539.08 \$ 555.82
					255					
Apr-18		\$219,072.15	0.9990	\$ 219,298.06	249			(\$3,822.43)	\$260,876.00	\$ 1,047.69
May-18 Jun-18		\$120.111.84 \$144.593.14	0.9989	S 120.239.34 S 144.808.08	237	\$ 507.34 \$ 621.49		(\$3.125.98) (\$2.821.65)	\$176.055.00 \$173.066.12	\$ 742.85 \$ 742.77
		\$144,593.14 \$269.042.05	0.9985		233	\$ 621.49 \$ 1.157.03		(\$2,821.65) (\$4,137.66)	\$173,066.12 \$295.825.36	\$ 742.77 \$ 1.269.64
Jul-18 Aug-18		\$269.042.05 \$86.462.79	0.9980	S 269.587.09 S 87.194.26		S 1.157.03 S 375.84		(\$4.137.66) (\$8.484.66)	\$295.825.36 \$107.311.01	\$ 1.269.64 \$ 462.55
		\$91,500,11	0.9916	\$ 87,194.26 \$ 96.568.74	232	\$ 3/5.84 \$ 418.05		(\$8,484.66) (\$4.371.10)	\$107,311.01 \$127,564.87	
Sep-18 Oct-18		\$91,500.11 \$331.425.82	0.9475	\$ 96,568.74 \$ 334.536.13	231			(\$4,371.10) (\$6.087.35)	\$127,564.87 \$373.974.49	\$ 552.23 \$ 1.692.19
0ct-18 Nov-18		\$331,AZ5.8Z \$226.913.45	0.9907	\$ 334,536.13 \$ 231,920.91		\$ 1,513.74 \$ 1,078.70		(\$6,087.35) (\$6,425.13)	\$373,974.49	\$ 1,692.19 \$ 1.208.53
Nov-18 Dec-18	\$2.452.839.38	\$142.827.59	0.9784	S 231,920.91 S 145.942.91	215	\$ 1,078.70	\$496.744.48	(\$4,527.32)	\$259,834.42 \$166,739.16	
* Express Completion Factor as a percen		3142,827.39	0.9787	7 143,342.31	208	701.83	5495.744.48	(34,327.32)	\$100,739.18	A 901.63

Dec-18

* Express Completion Factor as a percentage

**Express Prescription Drug Rebates as a negative number

Carrier Name: Capital Advantage Insurance Company
Product(s): PPO
Market Segment: Individual
Rate Effective Date: 1/1/2020

Table 2b. Manual Experience Period Claims and Premiums

Earned Premium	Paid Claims	Ultimate Incurred Claims	Member Months	Estimated Cost Sharing (Member & HHS)	Allowed Claims (Non-Capitated)	Non-EHB portion of Allowed Claims	Total Prescription Drug Rebates*	Total EHB Capitation	Total Non-EHB Capitation	Estimated Risk Adjustment
\$12,648,571.42	\$5,859,980.68	\$5,658,971.47	22,568	\$2,315,667.87	\$7,974,639.34		(\$238,424.77)	\$255,682.17	\$0.00	(\$3,395,553.64)
Experience Period Total Allowed EHB Claims + EHB Capitation PMPM (net of prescription drug rebates)										\$ 354.13
Loss Ratio									61.34%	

Loss Ratio
*Express Prescription Drug Rebates as a negative number

Table 3b. Manual Trend Components

Service Category	Cost*	Utilization*	Induced Utilization*	Composite Trend	Weight*
Inpatient Hospital	6.00%	2.30%	0.00%	8.44%	18.98%
Outpatient Hospital	5.65%	2.30%	0.00%	8.08%	39.36%
Professional	3.85%	1.80%	0.00%	5.72%	16.98%
Other Medical	5.65%	2.00%	0.00%	7.76%	3.41%
Capitation				3.00%	3.20%
Prescription Drugs	8.80%	0.85%	0.00%	9.72%	18.07%
Total Annual Trend				7.88%	100.00%
Months of Trend				24	
Total Applied Trend Projection Factor		X	XIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	1 164	

* Express Cost, Utilization, Induced Utilization and Weight as percentage:

Table 4b. Historical Manual Experience

							Estimated Annual Cost Sharing		Allowed Claims (Net of	
Month-Year	Total Annual Premium	Incurred Claims	Completion Factors*	Ultimate Incurred Claims	Members	Ultimate Incurred PMPM	(Member + HHS)	Prescription Drug Rebates**	Prescription Drug Rebates)	Allowed PMPM
Jan-15		\$715,661.71	1.0000		1,789	\$ 400.03		(\$1,210.91)	\$847,212.26	
Feb-15		\$764,779.59	1.0000	\$ 764,779.59	2,155	\$ 354.89		(\$756.18)	\$899,011.09	\$ 417.
Mar-15		\$717,506.14	1.0000		2,827	\$ 253.80		(\$30,151.50)	\$859,103.72	\$ 303.
Apr-15		\$787,842.27	1.0000		2,766			(\$1,471.34)	\$944,845.48	\$ 341.
May-15		\$802,490.06	1.0000		2,720			(\$4,719.22)	\$969,538.59	\$ 356.
Jun-15		\$771.692.30	1.0000		2.704	\$ 285.39		(\$95.673.71)	\$814.444.18	Š 301.
Jul-15	-	\$990,102.94	1.0000		2,652	\$ 373.34		(\$4,992.99)	\$1,131,979.04	
Aug-15	-	\$773,125.91	1.0000	\$ 773,125.91	2,626	\$ 294.41		(\$4,623.10)	\$921,829.28	\$ 351.
Sep-15	-	\$842,262.11	1.0000		2,627	\$ 320.62		(\$84,347.81)	\$891,221.56	
Oct-15	-	\$754,417.37 \$994,039.74	1.0000	\$ 754,417.37	2,558	\$ 294.92		(\$5,547.83)	\$858,964.92	\$ 335. \$ 429.
Nov-15					2,554			(\$4,106.53)		
Dec-15	\$8,538,561.04	\$983,119.09	1.0000		2,507		\$1,674,736.16	(\$158,337.80)	\$940,249.92	
Jan-16	-	\$6,862,123.64	1.0000		31,434	\$ 218.30		(\$49,543.64)	\$8,309,951.39	
Feb-16	-	\$8,645,871.30	1.0000		34,349	\$ 251.71		(\$20,136.12)	\$10,485,806.34	\$ 305.
Mar-16	-	\$11,970,854.45	1.0000	\$ 11,970,854.45	36,772	\$ 325.54		(\$775,490.70)	\$13,441,735.48	\$ 365.
Apr-16	ļ.	\$10.902.117.85	1.0000	\$ 10.902.117.85	36.816	\$ 296.12		(\$561.849.80)	\$12.401.137.08	Š 336.
May-16	-	\$11,276,680.01	1.0000	\$ 11,276,680.01	36,132	\$ 312.10		(\$1,375.43)	\$13,213,264.67	\$ 365.
Jun-16	-	\$12,159,758.52	0.9992	\$ 12,169,282.93	35,497	\$ 342.83		(\$439,783.56)	\$13,556,818.63	\$ 381.
Jul-16	-	\$11,036,476.50	0.9962		34,922	\$ 317.23		(\$467,508.00)	\$12,456,020.08	\$ 356.
Aug-16	-	\$10,037,982.62	0.9999		34,375	\$ 292.03		(\$339.79)	\$11,831,698.07	\$ 344.
Sep-16	-	\$9,783,740.45	1.0000		33,919	\$ 288.44		(\$521,117.40)	\$10,911,082.74	\$ 321.
Oct-16	-	\$10,642,743.95	1.0000	\$ 10,642,743.95	32,978	\$ 322.72		(\$0.92)	\$12,213,894.66	\$ 370.
Nov-16	ļ.	\$11,470,288.47	1.0000	\$ 11,470,673.42	32,184	\$ 356.41		(\$7.98)	\$13,033,137.18	\$ 404.
Dec-16	\$141,573,983.44	\$11,113,342.53	1.0000		30,676	\$ 362.29	\$21,393,629.33	(\$1,616,062.73)	\$11,040,422.01	\$ 359.
Jan-17	-	\$270,644.89	1.0000		2,921	\$ 92.66		(\$13,291.83)	\$589,248.78	\$ 201.
Feb-17	ļ.	\$332,347.58	1.0000	\$ 332,352.01	3,019			(\$12,503.68)	\$600,472.63	\$ 198.
Mar-17	-	\$848,334.60	1.0000		3,009	\$ 281.94		(\$13,455.39)	\$1,100,543.88	
Apr-17	ļ.	\$342.158.83	1.0000		2.928	\$ 116.86		(\$13.915.68)	\$619.964.91	
May-17	-	\$714,630.91	1.0000		2,835	\$ 252.08		(\$25,994.52)	\$987,764.07	
Jun-17	-	\$722,223.09	1.0000	\$ 722,235.32	2,761	\$ 261.58		(\$27,080.95)	\$1,018,157.38	\$ 368.
Jul-17	-	\$344,882.18	1.0000		2,716	\$ 126.98		(\$27,945.17)	\$544,919.53	\$ 200.
Aug-17	-	\$490,336.36	1.0000		2,659	\$ 184.41		(\$11,536.24)	\$700,427.82	\$ 263.
Sep-17	ļ.	\$488,743.89	1.0000		2,616			(\$12,585.49)	\$642,928.08	\$ 245.
Oct-17	-	\$469,580.50	1.0000		2,555			(\$13,220.87)	\$655,598.20	\$ 256.
Nov-17	ļ.	\$566.070.86	1.0000		2.502			(\$13.753.58)	\$746.818.13	Š 298.
Dec-17	\$15,277,780.74	\$882,642.99	0.9999		2,390		\$3,015,559.08	(\$14,777.82)	\$1,081,440.70	
Jan-18	-	\$370,686.57	0.9999		2,229			(\$13,012.91)	\$669,909.85	
Feb-18		\$304.993.18	0.9995		2.039	\$ 149.65		(\$13.487.82)	\$525.907.24	Š 257.
Mar-18	ļ.	\$350,083.61	0.9993		2,005	\$ 174.73		(\$15,194.73)	\$558,575.92	\$ 278.
Apr-18		\$423,498.07	0.9992		1.965			(\$21.745.14)	\$580.038.28	\$ 295.
May-18		\$525,532.30	0.9991		1,923			(\$12,618.90)	\$696,572.40	\$ 362
Jun-18		\$542,199.51	0.9988		1,894	\$ 286.62		(\$18,827.93)	\$745,613.26	\$ 393
Jul-18		\$450,737.52	0.9986		1,858	\$ 242.93		(\$18,488.75)	\$595,497.68	\$ 320
Aug-18		\$690,987.67	0.9905	\$ 697,584.86	1,832	\$ 380.78		(\$22,196.12)	\$882,284.97	\$ 481
Sep-18		\$394,157.98	0.9529	\$ 413,642.37	1,774	\$ 233.17		(\$20,191.43)	\$560,395.36	\$ 315
Oct-18		\$654,679.02	0.9920		1,735	\$ 380.39		(\$24,589.42)	\$807,547.68	
Nov-18		\$537.762.39	0.9841	\$ 546.434.53	1.681	\$ 325.07		(\$32.793.30)	\$643.382.83	\$ 382.
Dec-18	\$12,648,571,42	\$614,662,86	0.9808	\$ 626,712,71	1.633	\$ 383.78	\$2,315,667.87	(\$25,278,32)	\$726,171,27	\$ 444.

*Express Completion Factor as a percentage

*Express Prescription Drua Rebates as a negative number

PA Rate Template Part II
Rate Development and Change
Carrier Name:
Productly
Marint Segment
Rate Effective Date:
Table 5. Development of the Projected I

Development of the Projected Index Rate		ual Experience Data	Manual Data		
Total Allowed EHB Claims + EHB Capitation PMPM (net of prescription drue rebates) PMPM	s	857.12	s	254.12	 Actual Experience PMPM should be consistent with the Index Rate
Two war freed projection Factor		1.164		1.164	
Inadiasted Projected Allowed EHB Claims PMPM	5	997.55	2	412.14	
Single Risk Pool Adjustment Factors					
Change in Morbidity		0.604		1.604	<- See URRT Instructions
Change in Other		1.000		1.000	
Change in Demographics		1.000		.000	<- See URRT Instructions
Change in Network		1.000		.000	
Change in Senefits		1.000		.000	<- See URRT Instructions
Change in Other		1.000		.000	<- See URRT Instructions
Fotal Adjusted Projected Allowed EHS Claims PMPM	s	602.90	s	249.09	
Conditional Factors		0%		100%	c- See Instructions
Blended Projected EHB Claims PMPM			s	249.09	c- Projected Index Rate
Development of the Market-Adjusted Index Rate and Total Allowed Claims					='
Adjusted Projected Allowed EHB Claims PMPM	5	249.09	c- Index R	ate for Projecti	on Period on URRT - Individual or First Quarter Small Group
Adjusted Projected Allowed EHB Claims PMPM [will only populate for small group filings]	\$				
Projected Paid to Allowed Ratio		0.709			
Projected Paid EHS Claims PMPM	5	176.56			
Market-wide Adjustments					
Projected Risk Adjustment PMPM		\$0.00			
Projected Paid Exchange User Fees PMPM		\$0.00			
Market-Adjusted Projected Paid EHB Claims PMPM	\$	176.56			
Market-Adjusted Projected Allowed EHS Claims PMPM	\$	249.09	< Market	Adjusted Index	Rate
Projected Allowed Non-EHS Claims PMPM		\$0.00			
Market-Adjusted Projected Paid Total Claims PMPM	5	176.56			

Table 5A. Small Group Projected Index Rate with Quarterly Trend

Effective Date	1/1/2020	4/1/2020	7/1/2020	10/1/2020	Total Single Risk Pool
# of Member Months Renewing in Quarter					
Adjusted Projected Allowed EHS Claims PMPM Q1	\$ 249.09	\$ 249.09	\$ 249.09	\$ 249.09	\$ 249.09
Months of Trend		3	6	9	
Annual Trend	7.88%	7.88%	7.88%		
Single Risk Pool Projected Allowed Claims	\$ 249.09	\$ 253.86	\$ 258.72		
Quarterly Trend Factor	100.0%	101.9%	103.9%		
2020 Trend Factors by Quarter	#DIV/01	#DIV/01	#DFV/01	#DFV/DI	

Retention Items - Express in percentages	Percentages	PMPM Amounts
Administrative Expenses	19.99%	\$48.44
General and Claims	18.24%	\$44.19
Agent/Broker Fees and Commissions	1.35%	\$3.26
Quality Improvement Initiatives	0.41%	\$0.99
Taxes and Fees	5.15%	\$12.47
RA User Fee	0.07%	\$0.18
PA Premium Tax (if applicable)	2.00%	\$4.85
Federal Income Tax	0.42%	\$1.02
Health Insurance Providers Fee (Prorated for Small Groups only)	2.65%	\$6.43
Profit/Contingency (after tax)	2.00%	\$4.85
Total Retention	27.14%	\$65.76
Projected Required Revenue PMPM	\$ 242.31	

Table 7. Normalized Market-Adjusted Projected Allowed Total Claims

Normalization Factors		2019		2020
Average Age Factor		1,618		0.979
Average Geographic Factor		1.027		1.029
Average Tobacco Factor		1.006		1.005
Average Benefit Richness (Induced demand)		0.641		1.000
Average Network Factor		1.016		1.000
Market-Adjusted Projected Allowed Total Claims PMPM		\$817.31	5	249.09
Normalized Market-Adjusted Projected Allowed Total Claims PMPM	s	750.17	s	246.18

Rate Components		2019		2020	Diff	ference	Percent Change
A. Calibrated Plan Adjusted Index Rate (PMPM)	5	248.99	5	239.48		-\$9.51	-3.85
B. Base period allowed claims before normalization		\$284.15	5	354.13		\$69.98	28.25
C. Normalization factor component of change	5	(23.34)	\$	(4.14)		\$19.20	7.75
D. Change in Normalized Allowed Claims Adjustment Components							
D1. Base period allowed claims after normalization	5	260.81	5	349.99	5	89.18	35.85
D2. URRT Trend	5	49.92	5	57.34	5	7.42	3.05
D3. URRT Morbidity	5	18.64	5	(161.15)	\$	(179.79)	-72.25
D4. URRT Other	5	5.36	5		\$	(5.35)	-2.25
DS. Normalized URRT RA/RI on an allowed basis	5	415.46	\$		\$	(415.46)	-266.99
D6. Normalized Exchange User Fee on an allowed basis	5		5		5		0.01
D7. Subtotal - Sum(D1:06)	ś	750.18	s	246.18	s	(504.00)	-202.45
E. Change in Allowable Plan Adjusted Level Components							
E1. Network	5	24.59	5		5	(24.59)	-9.95
E2. Pricing AV		-360.9002948	s	(71.69)	ś	289.21	116.25
E3. Benefit Richness	5		s		5		0.01
E4. Catastrophic Elimbility	ė.	(206.94)	è		è	705.94	83.25
E5. Subtotal - Sum(E1:E4)	s	(543.24)	s	(71.69)	ś	471.56	189.45
F. Change in Retention Components							
F1. Administrative Expenses	5	31.05	5	47.87	5	16.82	6.83
F2. Taxes and Fees	s		š		š	6.30	2.55
F3. Profit and/or Continuency		4.98	è	4.79	è	(0.19)	-0.15
F4. Subtotal - Sum(F2:F3)	5	42.06	š	64.99	š	22.93	9.25
G. Change in Miscellaneous Items	-			\$0.00	5	-	0.09
H. Sum of Components of Rate Change (should approximate the change shown in line A)	5	249.00	5	239.48	\$	(9.51)	-3.85

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

	2019	2020	ī	1		1
Paid-to-Allowed	0.423	0.709				
URRT Trend (Total Applied Trend Factor)	1.191			< URRT W1, S2		
URRT Morbidity	1.060			< URRT W1, S2		
URRT "Other"	1.016	1.000		< URRT W1, S2	<- URRT W1, S2	 URRTW1, S2
				l	i	
Risk Adjustment	\$291.67			 usstwi, si 		
Exchange User Fee	\$0.00			 URRTWI, SI 		
Capitation	\$0.30	\$0.00		 URRTW1, S2 	- URRTWI, SZ	 URITWI, S2
Network	1.033	1.000				
Pricing AV	0.534	0.709		<- For 2019 in cell JB1, please include a fa-	 For 2019 in cell IB1, please include a factor equal to the product of the s 	 For 2019 in cell JB1, please include a factor equal to the product of the average Pricing AV and the Non-Fun
Benefit Richness	1.000	1.000				
Catastrophic Eligibility	0.500	1.000				
Administrative Expenses	12.47%	19.99%				
Taxes and Fees	2.42%	5.15%				
Profit and/or Contingency	2.00%	2.00%				

| Part |

PA Rate Template Part IV A - Individual
Table 11. Plan Premium Development for 21-Year-Old Non-Tobacco User

Carrier Name: Capital Advantage Insurance Company
Productify
Will
Market Engrand: Insulation
Place Effective Cable: 1/4/2020.

Plan Number	HIOS Plan ID (Standard Component)	1/1/2019 Plan Marketing Name	Discontinued, New, Modified, Existing (D,N,M,E) for 2020	1/1/2020 Plan HIOS Plan ID (If 1/1/2019 Plan Discontinued & Masoedi	Metalik Tier	Exchange On/Off or Off
Totals		These cells auto-fill	using the data or	stered in Table 33.		

			2019 21-ye	er-old, Non-T	Tobacco Pren	nium PMPM			
1	2	3	4	s	6	,		9	Average (weighted by enrollment by rating areal
ś .	٤.	\$ -	ś .	٠. 2	5 248.99	5 256.46	\$ -	5 268.91	\$ 256.60

	2	1	4	5	Fobacco Prem	7		۰	Average (weighted by enrollment by rating area)
4 .	s .	5 -	s -	s -	5 239.48	5 256.24	5 -	5 241.88	\$ 246.80

	2019 22-year-old, Non-Tobacco Premium PMPM	2020 21-year-old, Non-Tobacco Premium PMFM	Change in 21-year-old Non-Tebacco Premium PMPM
Discontinued, No. ModRef. 1/1/2009 Plan HIGS Plan Cachange 1/1/2009 Plan HI	Average	Average	Average
Totals These cells auto-fill usins the data entered in Table 50.	5 - 5 - 5 - 5 - 5 - 5 - 5 28800 5 2646 5 - 5 26801 5 25500	5 - 5 - 5 - 5 - 5 - 5 - 5 20048 5 20524 5 - 5 24188 5 24680	00% 00% 00% 00% 00% -10% 00% -101% -18%
	\$. \$. \$. \$. \$. \$. \$. \$. \$. \$.	\$. \$. \$. \$. \$. \$. \$. \$. \$. \$ 220.48 \$ 226.28 \$. \$ 241.88 \$ 246.60 \$. \$. \$. \$. \$. \$. \$. \$. \$. \$	210 270 270 281

PA Rate Quarterly Template Part V Consumer Factors

Table 12. Age and Tobacco Factors

	Proj	ection Perio	d Age and	Tobacco F	actors	
Age Band	Age Factor	Tobacco Factor		Age Band	Age Factor	Tobacco Factor
0-14	0.765			40	1.278	1.075
15	0.833			41	1.302	1.075
16	0.859			42	1.325	1.075
17	0.885			43	1.357	1.075
18	0.913	1.000		44	1.397	1.075
19	0.941	1.000		45	1.444	1.100
20	0.970	1.000		46	1.500	1.100
21	1.000	1.025		47	1.563	1.100
22	1.000	1.025		48	1.635	1.100
23	1.000	1.025		49	1.706	1.100
24	1.000	1.025		50	1.786	1.150
25	1.004	1.025		51	1.865	1.150
26	1.024	1.025		52	1.952	1.150
27	1.048	1.025		53	2.040	1.150
28	1.087	1.025		54	2.135	1.150
29	1.119	1.025		55	2.230	1.200
30	1.135	1.025		56	2.333	1.200
31	1.159	1.025		57	2.437	1.200
32	1.183	1.025		58	2.548	1.200
33	1.198	1.025		59	2.603	1.200
34	1.214	1.025		60	2.714	1.250
35	1.222	1.025		61	2.810	1.250
36	1.230	1.025		62	2.873	1.250
37	1.238	1.025		63	2.952	1.250
38	1.246	1.025		64+	3.000	1.250
39	1.262	1.025				

^{*}PA follows the federal default age curve.

Carrier Name: Capital Advantage Insurance Company

Product(s): PPO
Market Segment: Individual
Rate Effective Date: 1/1/2020

Table 13. Geographic Factors

	Geographic Area Factors		
Area	Counties	Current Factor	Proposed Factor
Rating Area 1			
Rating Area 2			
Rating Area 3			
Rating Area 4			
Rating Area 5			
Rating Area 6	Centre, Columbia, Lehigh, Mifflin, Montour, Northampton, Northumberland, Schutlkill, Snyder, Union	1.000	1.000
Rating Area 7	Adams, Berks, Lancaster, York	1.030	1.070
Rating Area 8			
Rating Area 9	Cumberland, Dauphin, Franklin, Fulton, Juniata, Lebanon, Perry	1.080	1.010

Table 14. Network Factors

	Projecion Period Network Factors			
Network Name	Rating Area	Current Factor	Proposed Factor	DOH Approval Date
PPO	All	1.000	1	

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Table B

<u>Plan ID</u>	<u>Plan Name</u>	Metal Level	Projected Membership	Projected Allowed Claims	Projected Paid Claims	Paid to Allowed Factor	Average Tobacco Factor	AV and Cost Sharing Factor	(8)/(6*7) Induced Utilization	Induced Demand Table 10
(1)		(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	
82795PA0140001	Catastrophic PPO 8150/0/75	Bronze	752	187,318	132,772	0.71	1.000	0.71	1.00	1.00
Total			752	187,318	132,772	0.71	1.00	0.71	1.00	1.00
PMPM				249.09	176.56					
Rate Dev II				249.09	176.56					

Capital Advantage Insurance
Company Name:
Company
Market:
Individual
Product:
PPO
Effective Date of Rates:
January 1, 2020

Ending date of Rates:

December 31, 2020

Effective Date of Rates:	January	1, 2020			Ending date of Rates:		
HIOS Plan ID (On Exchange)=>	82795PA	0140001	82795PA	0140001	82795PA	0140001	
HIOS Plan ID (Off Exchange)=>	82795PA		82795PA		82795PA 82795PA		
Plan Marketing Name =>	Catastrophic P		Catastrophic P		Catastrophic P		
Form # =>	CAIC-Ind-PF		CAIC-Ind-PI		CAIC-Ind-PF		
Rating Area =>	6		7		g)	
Network =>	PP	0	PF	0	PP	0	
Metal =>	Bro	nze	Bro	nze	Bro	nze	
Deductible =>	\$8150 Med/F	Rx Combined	\$8150 Med/I	Rx Combined	\$8150 Med/F	Rx Combined	
Coinsurance =>	09	%	09	%	09	%	
Copays =>	\$75/\$0/\$0 F		\$75/\$0/\$0 F		\$75/\$0/\$0 F		
OOP Maximum =>	\$8150 Med/F		\$8150 Med/Rx Combined		\$8150 Med/F		
Pediatric Dental (Yes/No) =>	Ye		Ye		Ye		
Age Band	Non-Tobacco	Tobacco	Non-Tobacco	Tobacco	Non-Tobacco	Tobacco	
0 - 14	\$183.20	\$183.20	\$196.03	\$196.03	\$185.03	\$185.03	
15 16	\$199.49 \$205.71	\$199.49 \$205.71	\$213.45 \$220.11	\$213.45 \$220.11	\$201.48 \$207.77	\$201.48 \$207.77	
17	\$203.71	\$203.71	\$226.78	\$226.78	\$207.77	\$207.77	
18	\$211.94	\$211.94	\$233.95	\$233.95	\$214.00	\$214.00	
19	\$225.35	\$225.35	\$241.13	\$241.13	\$227.60	\$227.60	
20	\$232.30	\$232.30	\$248.56	\$248.56	\$234.62	\$234.62	
21	\$239.48	\$245.47	\$256.24	\$262.65	\$241.87	\$247.92	
22	\$239.48	\$245.47	\$256.24	\$262.65	\$241.87	\$247.92	
23	\$239.48	\$245.47	\$256.24	\$262.65	\$241.87	\$247.92	
24	\$239.48	\$245.47	\$256.24	\$262.65	\$241.87	\$247.92	
25	\$240.44	\$246.45	\$257.27	\$263.70	\$242.84	\$248.91	
26	\$245.23	\$251.36	\$262.39	\$268.95	\$247.68	\$253.87	
27	\$250.98	\$257.25	\$268.54	\$275.26	\$253.48	\$259.82	
28	\$260.31	\$266.82	\$278.54	\$285.50	\$262.92	\$269.49	
29	\$267.98	\$274.68	\$286.74	\$293.91	\$270.66	\$277.42	
30	\$271.81 \$277.56	\$278.61 \$284.50	\$290.84	\$298.11	\$274.53 \$280.33	\$281.39 \$287.34	
31 32	\$277.36	\$290.39	\$296.99 \$303.14	\$304.41 \$310.71	\$280.33	\$293.29	
33	\$285.30	\$294.07	\$306.98	\$314.65	\$280.14	\$293.29	
34	\$290.73	\$298.00	\$311.08	\$318.86	\$293.64	\$300.98	
35	\$292.64	\$299.96	\$313.13	\$320.96	\$295.57	\$302.96	
36	\$294.56	\$301.92	\$315.18	\$323.06	\$297.51	\$304.94	
37	\$296.48	\$303.89	\$317.23	\$325.16	\$299.44	\$306.93	
38	\$298.39	\$305.85	\$319.28	\$327.26	\$301.38	\$308.91	
39	\$302.22	\$309.78	\$323.38	\$331.46	\$305.25	\$312.88	
40	\$306.06	\$329.01	\$327.48	\$352.04	\$309.12	\$332.30	
41	\$311.80	\$335.19	\$333.63	\$358.65	\$314.92	\$338.54	
42	\$317.31	\$341.11	\$339.52	\$364.99	\$320.48	\$344.52	
43	\$324.97	\$349.35	\$347.72	\$373.80	\$328.22	\$352.84	
44 45	\$334.55 \$245.91	\$359.65	\$357.97 \$370.03	\$384.82 \$407.03	\$337.90 \$349.37	\$363.24	
45 46	\$345.81 \$359.22	\$380.39 \$395.14	\$370.02 \$384.37	\$407.02 \$422.80	\$349.27 \$362.81	\$384.19 \$399.09	
40	\$359.22 \$374.31	\$395.14 \$411.74	\$384.37	\$440.56	\$302.81	\$399.09	
48	\$374.51	\$430.70	\$400.31	\$460.85	\$378.03	\$435.01	
49	\$408.55	\$449.41	\$437.15	\$480.87	\$412.64	\$453.90	
50	\$427.71	\$491.87	\$457.65	\$526.30	\$431.99	\$496.79	
51	\$446.63	\$513.62	\$477.89	\$549.58	\$451.10	\$518.76	
52	\$467.46	\$537.58	\$500.19	\$575.22	\$472.14	\$542.96	
53	\$488.54	\$561.82	\$522.74	\$601.15	\$493.42	\$567.44	
54	\$511.29	\$587.98	\$547.08	\$629.14	\$516.40	\$593.86	
55	\$534.04	\$640.85	\$571.42	\$685.71	\$539.38	\$647.26	
56	\$558.71	\$670.45	\$597.82	\$717.38	\$564.29	\$677.15	
57	\$583.61	\$700.34	\$624.47	\$749.36	\$589.45	\$707.34	
58	\$610.20	\$732.23	\$652.91	\$783.49	\$616.30	\$739.56	
59 60	\$623.37	\$748.04 \$812.44	\$667.00	\$800.40	\$629.60	\$755.52	
60 61	\$649.95 \$672.94	\$812.44 \$841.17	\$695.45 \$720.04	\$869.31 \$900.06	\$656.45 \$679.67	\$820.56 \$849.59	
62	\$672.94 \$688.03	\$841.17 \$860.03	\$720.04 \$736.19	\$900.06	\$679.67 \$694.91	\$849.59 \$868.63	
63	\$706.94	\$883.68	\$756.43	\$945.54	\$094.91 \$714.01	\$892.52	
64+	\$700.54 \$718.43	\$898.05	\$750. 4 3 \$768.72	\$960.91	\$725.61	\$907.03	
<u> </u>	7, 20, 10	+555.05	T, 00.72	+300.51	7,20.01	Ţ30,.00	

Page Number: 1 12/24/2014

Capital Advantage Insurance Company Individual Plan Design Summary

				On/Off			
HIOS Plan ID	Plan Marketing Name	Product	Metal	Exchange	Network	Rating Area	Counties Covered
82795PA0140001	Catastrophic PPO 8150/0/75	PPO	Catastrophic	Off	PPO	6,7,9	All

Company Name Capital Advantage Insurance Company

Market Individual

RATES FOR AGE 21, NON-TOBACCO USER, BY RATING AREA AND COUNTY

	02-01-2019 Number of Co	vered Lives by R	ating County	
HIOS Plan ID	Plan Marketing Name	Product	Metal	On/Off Exchange
82795PA0140001	Catastrophic PPO 8150/0/75	PPO	Catastrophic	Off

RATING AR	FING AREA 6 RATING AREA 7													
1	2	8	1	0	6	0	1	0	0	1	5	11	4	
Centre	Columbia	Lehigh	Mifflin	Montour	Northampton	Northumberland	Schuylkill	Snyder	Union	Adams	Berks	Lancaster	York	
\$239.48	\$239.48	\$239.48	\$239.48	\$239.48	\$239.48	\$239.48	\$239.48	\$239.48	######	\$256.24	\$256.24	\$256.24	\$256.24	

RATING AREA 7

_	RATING AREA 9									
	7	4	0	0	0	1	0			
	Cumberland	Dauphin	Franklin	Fulton	Juniata	Lebanon	Perry			
ļ	\$241.87	\$241.87	\$241.87	\$241.87	\$241.87	\$241.87	\$241.87			

В	C	D	E	F	G	Н		1	K L M N O P Q R S
Unified Rate Review v5.0		-	- '	"	-			, -	To add a product to Worksheet 2 - Plan Product Info, select the Add Product button or Ctrl + Shift + I To add a plan to Worksheet 2 - Plan Product Info, select the Add Plan button or Ctrl + Shift + L
Company Legal Name:	Capital Advantage Insurance Con	mpany					State:	PA	To validate, select the Validate button or Ctrl + Shift + I.
HIOS Issuer ID:	82795						Market:	Individual	To finalize, select the Finalize button or Ctrl + Shift + F.
Effective Date of Rate Change(s):	1/1/2020								
Market Level Calculations (Same for	all Plans)								
Section I: Experience Period Data Experience Period:		1/1/201	to Total	12/31/2018 PMPM					
Allowed Claims			\$2,421,377.43	\$857.12					
Reinsurance			\$0.00	\$0.00					
Incurred Claims in Experience Period			\$1,924,632.95	\$681.29					
Risk Adjustment			\$51,297.40	\$18.16					
Experience Period Premium			\$2,452,839.38	\$868.26					
Experience Period Member Months			2,825						
Section II: Projections	1	Voor	1 Trend	Year 2 Tre	nd .		_		
Benefit Category	Experience Period Index Rate PMPM	Cost	Utilization	Cost	Utilization	Trended EHB Allowed Claims PMPM	•		
Inpatient Hospital	\$345.51	1.05	1.023	1.063	1.023	\$406.2	28		
Outpatient Hospital	\$202.61	1.05		1.060	1.023	\$236.6			
Professional	\$205.62	1.04		1.037	1.018	\$229.8			
Other Medical	\$21.55	1.05		1.060	1.020	\$25.0			
Capitation	\$0.00	1.030		1.030	1.000	\$0.0			
Prescription Drug	\$81.82	1.089	1.004	1.087	1.013	\$98.5			
Total	\$857.11					\$996.2	29		
Morbidity Adjustment				0.604					
Demographic Shift				1.000					
Plan Design Changes				1.000					
Other				1.000					
Adjusted Trended EHB Allowed Claim	s PMPM for	1/1/2020)	\$601.76					
Manual EHB Allowed Claims PMPM				\$249.09					
Applied Credibility %				0.00%					
					Projected Period Totals	1			
Projected Index Rate for Reinsurance		1/1/2020	J	\$249.09 \$0.00	\$187,315.68 \$0.00				
				\$0.00	\$0.00				
				0.00%	\$0.00				
Risk Adjustment Payment/Charge									
Risk Adjustment Payment/Charge Exchange User Fees				\$249 09	\$187 315 68				
Risk Adjustment Payment/Charge Exchange User Fees Market Adjusted Index Rate				\$249.09	\$187,315.68				

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

1 of 3

Product-Plan Data Collection

To add a product to Worksheet 2 - Plan Product Info, select the Add Product button or Ctrl + Shift + P.
To add a plan to Worksheet 2 - Plan Product Info, select the Add Plan button or Ctrl + Shift + L.
To validate, select the Validate button or Ctrl + Shift + I.
To finalize, select the Finalize button or Ctrl + Shift + F.

State: Market:

PA Individual

Capital Advantage Insurance Company 82795 1/1/2020 Company Legal Name: HIOS Issuer ID: Effective Date of Rate Change(s):

Product/Plan Level Calculations

ald #	Section I	· General	Product	and E	Dian I	nforms

Field #	Section I: General Product and Plan Information		
1.1	Product Name	PPO	PPO
1.2	Product ID	82795PA012	82795PA014
		Silver	
		CareConnect	
		3000/0/35	Catastrophic PPO
1.3	Plan Name	Combined w/Med	8150/0/75
1.4	Plan ID (Standard Component ID)	82795PA0120001	82795PA0140001
1.5	Metal	Silver	Catastrophic
1.6	AV Metal Value	0.710	0.608
1.7	Plan Category	Terminated	Renewing
1.8	Plan Type	PPO	PPO
1.9	Exchange Plan?	No	No
1.10	Effective Date of Proposed Rates	1/1/2020	1/1/2020
1.11	Cumulative Rate Change % (over 12 mos prior)	0.00%	-3.82%
1.12	Product Rate Increase %	0.00%	-3.82%
1.13	Submission Level Rate Increase %	-3.8	32%

Worksheet 1 Totals	Section II: Experience Period and Current Plan Level Information									
	2.1 Plan ID (Standard Component ID)	Total	82795PA0120001	8						
\$2,421,377	2.2 Allowed Claims	\$2,421,377	\$2,421,377							
\$0	2.3 Reinsurance	\$0	\$0							
	2.4 Member Cost Sharing	\$496,744	\$496,744							
	2.5 Cost Sharing Reduction	\$0	\$0							
\$1,924,633	7.6 Incurred Claims	\$1,024,633	\$1 924 633							

	2.5 Cost Sharing Reduction	\$0	\$0	\$0
\$1,924,633	2.6 Incurred Claims	\$1,924,633	\$1,924,633	\$0
\$51,297	2.7 Risk Adjustment Transfer Amount	\$124,618	\$124,618	\$0
\$2,452,839	2.8 Premium	\$2,452,839	\$2,452,839	\$0
2,825	2.9 Experience Period Member Months	2,825	2,825	0
	2.10 Current Enrollment	52	0	52
	2.11 Current Premium PMPM	\$416.43	\$0.00	\$416.43
	2.12 Loss Ratio	74.67%	74.67%	#DIV/0
	Per Member Per Month			
	2.13 Allowed Claims	\$857.12	\$857.12	#DIV/0
	2.14 Reinsurance	\$0.00	\$0.00	#DIV/0
	2.15 Member Cost Sharing	\$175.84	\$175.84	#DIV/0
	2.16 Cost Sharing Reduction	\$0.00	\$0.00	#DIV/0
	2.17 Incurred Claims	\$681.29	\$681.29	#DIV/0
	2.18 Risk Adjustment Transfer Amount	\$44.11	\$44.11	#DIV/0
	2.19 Premium	\$868.26	\$868.26	#DIV/0

Section III: Plan Adjustment Factors

3.1 Plan ID (Standard Component ID)		82795PA0120001	82795PA0140001
3.2 Market Adjusted Index Rate		\$24	9.09
3.3 AV and Cost Sharing Design of Plan		1.0000	0.7088
3.4 Provider Network Adjustment		1.0000	1.0000
3.5 Benefits in Addition to EHB		1.0000	1.0000
Administrative Costs			
3.6 Administrative Expense		0.00%	19.99%
3.7 Taxes and Fees		0.00%	5.15%
3.8 Profit & Risk Load		0.00%	2.009
3.9 Catastrophic Adjustment		1.0000	1.0000
3.10 Plan Adjusted Index Rate		\$249.09	\$242.32
3.11 Age Calibration Factor	1.0215	1.0	215
3.12 Geographic Calibration Factor	0.9720	0.9	720
3.13 Tobacco Calibration Factor	0.9954	0.9	954
3.14 Calibrated Plan Adjusted Index Rate		\$246.18	\$239.49

Section IV: Projected Plan Level Information

4.1 Plan ID (Standard Component ID)	Total	82795PA0120001	82795PA0140001
4.2 Allowed Claims	\$187,316	\$0	\$187,316
4.3 Reinsurance	\$0	\$0	\$0
4.4 Member Cost Sharing	\$54,544	\$0	\$54,544
4.5 Cost Sharing Reduction	\$0	\$0	\$0
4.6 Incurred Claims	\$132,772	\$0	\$132,772
4.7 Risk Adjustment Transfer Amount	\$0	\$0	\$0
4.8 Premium	\$182,220	\$0	\$182,220
4.9 Projected Member Months	752	0	752
4.10 Loss Ratio	72.86%	#DIV/0!	72.86%
Per Member Per Month			
4.11 Allowed Claims	\$249.09	#DIV/0!	\$249.09
4.12 Reinsurance	\$0.00	#DIV/0!	\$0.00
4.13 Member Cost Sharing	\$72.53	#DIV/0!	\$72.53
4.14 Cost Sharing Reduction	\$0.00	#DIV/0!	\$0.00
4.15 Incurred Claims	\$176.56	#DIV/0!	\$176.56
4.16 Risk Adjustment Transfer Amount	\$0.00	#DIV/0!	\$0.00
4.17 Premium	\$242.31	#DIV/0!	\$242.31

Rating Area Data Collection

Specify the total number of Rating Areas in your State by selecting the Create Rating Areas button or Ctrl + Shift + R. Select only the Rating Areas you are offering plans within and add a factor for each area.

To validate, select the Validate button or Ctrl + Shift + I.

To finalize, select the Finalize button or Ctrl + Shift + F.

Rating Area	Rating Factor	
Rating Area 6	1.0000	
Rating Area 7	1.0700	
Rating Area 9	1.0100	

CAPITAL ADVANTAGE INSURANCE COMPANY, INC.

ACTUARIAL MEMORANDUM Individual Rates Effective January 1, 2020

General Information

Company Information

• Company Legal Name: Capital Advantage Insurance Company – CAIC

• State: PA

HIOS Issuer ID: 82795Market: Individual

• Effective Date: 1/1/2020

PID Company Information

• Company Name: Capital Advantage Insurance Company (CAIC)

• NAIC: 41203

• Market: Individual

• On/Off Exchange: Off Exchange

• Effective Date: 1/1/2020

• Average Rate Change Requested: -3.8%

• Range of Requested Rate Change: -3.8% to -3.8%

• Total additional annual revenue generated from the proposed rate change: \$(6,073)

• Product: PPO

• Rating Areas: 6,7,9

• Metal Levels: Catastrophic

• Current Covered Lives and Policyholders: 52/47

• 2020 Number of Plans: 1

• 2019 Number of Plans and Change: 1/No Plan Change

• Contract Form #: CAIC-Ind-PPO-C-v0120

• Form Filing SERFF #: CABC-131915200

• Binder SERFF #: CABC-PA20-125092048

• HIOS Issuer ID: 82795

• HIOS Submission Tracking Number: 82795-1473191712519638017

Company Contact Information

• Primary Contact Name:

• Primary Contact Telephone Number:

• Primary Contact Email Address:

Scope and Purpose

By this filing, Capital Advantage Insurance Company (CAIC), a subsidiary of Capital BlueCross (CBC), submits rates for products to be made available effective January 1, 2020. CAIC will only offer products off the federally-facilitated exchange.

Rate History and Proposed Variations in Rate Changes

Market	Company	Effective Date	SERFF#	Annual Increase
Individual	CAIC	1/1/2016	CABC-130079084	-2.10%
Individual	CAIC	1/1/2017	CABC-130539588	39.00%
Individual	CAIC	1/1/2018	CABC-131022047	20.20%
Individual	Individual CAIC		CABC-131454888	-43.20%

Average Rate Change

CAIC is proposing an aggregate annual -3.8% rate change. The rate change does vary by plan. The rate change is calculated in PA Rate Template Part III, Table 10, cell AC15.

The key drivers of the rate change, and approximate impact, are as follows:

Reimplementation of the Health Insurer Fee: 3%

Catastrophic plan performance better than forecasted: -15%

Future Cost and Utilization: 8%

Regulatory Considerations

Rates submitted by this filing assume changes to the current regulatory framework. As directed by the Insurance Department, the following factors have been applied to the rates for regulatory changes:

• Individual Mandate: 0.06 added to the morbidity factor.

Membership

Membership is shown in PA Rate Template Part I, Table 1. The average age is 47.

Benefit Changes 2019-2020

A summary of proposed 2020 benefits is included in Exhibit A.

There are several benefit changes being implemented in 2020. All benefit changes comply with the uniform modification of coverage standards described in 45 CFR 147.106(e). Any plan with a benefit change that did not meet the uniform modification of coverage standard was terminated, and a new plan was created in its place. Benefit changes by plan are listed in Exhibit B, highlighted in yellow.

Experience Period Premium and Claims

Single Risk Pool: The data used to develop rates and shown in URRT and PA Rate Exhibits abides by 45 CFR part 156.80(d) single risk pool requirements. The single risk pool reflects all covered lives for every non-grandfathered, non-transitional product/plan combination for CAIC in the individual market.

Base Experience Period: The base experience period (BEP) includes completed fee-for-service paid and incurred claims for dates of service between January 1, 2018 and December 31, 2018.

Paid Through Date: Claims in the BEP are paid through March 31, 2019

Premiums (net of MLR Rebate) in BEP: Premiums are calculated on an earned basis in the BEP. MLR rebate adjustments applied are equal to zero.

Allowed and Incurred Claims in BEP:

- Allowed claims are developed by combining paid claims with member cost-sharing.
 Allowed claims meet the definition in the URR instructions. They do not include provider quality incentive payments.
- Incurred claims are net of HHS CSR payments.
- CBC only covers Essential Health benefits (EHBs).
- CAIC does not include capitated services.
- Allowed and Incurred claims are net of pharmacy rebates. BEP rebates are completed based on actual utilization of rebate-eligible drugs and rebate amounts.

Estimated Incurred but Not Paid Claims: Paid claims by date of service come directly from CBC's data warehouse. The method for calculating incurred claims in the BEP is as follows:

- 1. Historical fee-for-service claims are viewed by date of service and date of payment in a claims triangle.
- 2. The claims triangle payments are then accumulated by date of service to develop factors that represent the rate of accumulation or rate of "completion".
- 3. Historical rates of completion by duration are used to derive projected rates of completion. Some of the methods used to develop projected completion factors are averages (e.g. harmonic averages, time weighted averages, geometric averages) and regression methods. Numerous items are considered when viewing these averages or regression statistics, such as the impact of high claims on perceived completion patterns.

- 4. For durations that exhibit a projected completion factor greater than the Valuation Actuary's chosen threshold (e.g. 80% complete), cumulative paid and incurred claims are divided by the projected completion factor to arrive at ultimate incurred claims. For durations that are less than the chosen threshold, a projection methodology is used. Similar to completion factor development, projection methodologies are worthy of a lengthy discussion. In general, an ultimate incurred claims PMPM is derived by projecting a recent 12-month period to the current month(s) and seasonally adjusting.
- 5. With all months having both a cumulative paid amount and an estimated ultimate incurred amount, the completion factors used in pricing are calculated by taking the quotient of the two. Allowed completion and incurred completion are assumed to be identical.
- 6. Both allowed and paid claims in the BEP are completed by applying completion factors by incurred month developed in Step 6.

$$BEP\ Incurred\ Claims\ =\ \sum rac{BEP\ Paid\ Claims\ by\ Incurred\ Month}{Completion\ by\ Incurred\ Month}$$

BEP Allowed Claims

$$= \sum \frac{BEP\ Paid\ Claims + BEP\ Member\ Cost\ Share\ by\ Incurred\ Month}{Completion\ by\ Incurred\ Month}$$

Risk Adjustment in BEP: Risk adjustment amounts in the BEP are equal to final risk adjustment transfer amounts released on June 28, 2019.

Loss Ratio in BEP: Loss ratio is 74.67%

Credibility of Data

CAIC individual data is not credible, so CBC subsidiary, Keystone Health Plan Central (KHPC) is used as the credibility manual. KHPC data is relevant to CAIC rate development because KHPC offers off-exchange Bronze and Catastrophic plans, similar to CAIC's 2020 product offering.

Trend Identification

Trend: 7.9%

Trend levels reflect CBC's best estimate of changes in utilization, provider reimbursement contracts, the network of facilities and providers, disease management initiatives and the impact of utilization management.

The following is a description of considerations used to determine trend.

- 1. Base Cost/ Change in hospital and physician contracting: The contracted increase in reimbursements to hospitals and physicians is the basis of cost trends. CBC uses the following to project future costs:
 - a. Vendor Physician Cost Model and Internal Hospital Contracting Model

- i. The medical cost models use best estimates of Capital BlueCross (CBC)'s future contracting increases with physicians and hospitals. The models use cost estimates based on varying contract effective dates by physician and hospital. All facilities and providers are considered in this modeling effort (i.e. acute and non-acute, network and non-network, inpatient and outpatient, in- area and out-of-area). From there, a monthly anticipated cost (assuming static utilization) summary is produced which can be used in projecting future claims costs. Cost trends are determined at the CBC book of business level for all commercial business.
- b. Internal Prescription Drug Trend Model
 - i. Price Inflation
 - ii. Contract Pricing
 - iii. Member Cost-Sharing
 - iv. Units per Script
 - v. Brand/Generic Mix
 - vi. Therapeutic Mix
 - vii. Cost per Script
 - viii. Pipeline (new drugs)
- 2. Utilization Considerations:
 - a. Intensity of medical services rendered
 - b. Changes in place of service (e.g. continued migration of inpatient stays to outpatient setting)
 - c. Further migration from brand prescription drugs to generic prescription drugs
 - d. Favorable impacts of value based benefits designs
 - e. Medical utilization estimates reviewed by CBC's Chief Medical Officer
- 3. Leveraging: The trend model is based on allowed cost increases. Paid claims trend at a higher rate than allowed due to leveraging. Leveraging is the impact of static cost-share, such as deductibles and copays, to the paid trend.
- 4. Intensity: Measure of cost increase due to change in treatment sophistication. An example is migration from x-rays to MRIs at significantly higher cost.
- 5. Underwriting Cycle: The underwriting cycle is defined as the tendency to swing between profitable and unprofitable periods over time. The underwriting cycle is exacerbated partly by pricing performed with incomplete information as to the level of current experience trends. A reaction delay occurs, as carriers tend to rely on measurements of past experience in developing current pricing assumptions. As a result, carriers are often increasing their pricing trends when actual experience trends have begun to decline, and decreasing their pricing trends actual trends are increasing. CBC strives to mitigate the underwriting cycle by keeping trends consistent through times of increasing and decreasing claim cost and utilization.

Historical Experience: Historical experience was not used to the develop trend.

Benefit Categories: Claims in the benefit categories displayed in URRT come directly from CBC's data warehouse. These same categories are used to develop category-level trend. See Exhibit C for a description of benefits by benefit category.

See Exhibit E for CAIC's pricing trend, as well as cost and utilization components of the pricing trend.

Rate Development & Change

Projection Factors

Changes in Morbidity: Found in URRT Worksheet 1, "Morbidity Adjustment", and PA Rate Exhibits, Table 5. The changes to morbidity is equal to the Department's Individual Adjustment factor discussed above.

Changes in Benefits: Benefit changes are not applied to allowed claims as allowed should stay consistent from 2018 to 2020. Benefit changes are applied in the development of future incurred claims, due to changes in member cost-share. This calculation is shown in Exhibit D, and applied in Exhibit G. The manual cost PMPMs are developed from CBC's internal benefit relativity model, discussed in the Plan Adjusted Index Rate section below. The benefit change is equal to member-month weighted average projected manual PMPM divided by member-month weighted average manual PMPM in the BEP. This process is further discussed in the Paid-to-Allowed section below.

Changes in Demographics: CAIC does not expect changes in demographics in its individual population.

Changes in Network: No network adjustment is applied.

Other Adjustments: No other adjustment is applied.

Benefits, Demographics, Network and Other adjustments are found in URRT Worksheet 1 and PA Rate Exhibits Table 5.

Index Rate

The experience period index rate is CAIC's allowed claims PMPM, set in accordance with the single risk pool provision. All CAIC covered benefits are categorized as Essential Health Benefits (EHBs), therefore no adjustment was made to the experience period index.

Projected Allowed Claims: The CAIC experience period allowed claims, benefit-adjusted, trended to the projection period (See <u>Projection Factors</u> section above), and credibility adjusted, is the *Projected Allowed Claims at Current Benefits*. This number is reflected in Worksheet 1 of URRT ("Projected Allowed Experience Claims PMPM (w/ applied credibility if applicable)").

To calculate the projected index rate:

- 1. Start with Projected Allowed Claims at Current Benefits
- 2. The *Projected Allowed Claims at Current Benefits* reflect EHBs 100 percent, so no adjustment needs to be made to add EHBs and remove non-EHB claim cost. This is the index rate for individuals renewing January December.

See Exhibit J for the Index Rate.

Paid to Allowed Ratio

CAIC used the prescribed URRT allowed claim rate development methodology in conjunction with a paid and incurred rate development methodology to determine final premium rates. URRT projects allowed claims, and uses a paid-to-allowed ratio in order to adjust allowed claims to paid levels. This value is then used to develop premiums. In order to determine the paid-to-allowed ratio, CAIC projected paid and incurred claims, adjusted for benefits, to the experience period.

Projected Paid and Incurred Claims are calculated as follows:

- 1. Gather claims experience as described in the Data section above.
 - a. Base Experience Period (BEP) Paid Claims, Capitation, and Rx Rebates
 - b. BEP Member Months
- 2. Develop BEP Paid and Incurred Claims:

BEP Paid and Incurred Claims =
$$\frac{BEP \ Paid \ Claims}{Completion \ Factor}$$

The development of completion factors is described in <u>Experience Period Premium</u> and Claims above.

3. Develop the BEP Paid and Incurred Claim PMPM:

$$BEP\ Paid\ and\ Incurred\ Claim\ PMPM = \frac{BEP\ Paid\ and\ Incurred\ Claims}{BEP\ Member\ Months}$$

4. Develop *Trended Claim PMPM*: Using the aggregate trend described in the <u>Projection Factors</u> section above, trend the BEP Paid and Incurred Claim PMPM from the midpoint of the experience period to the midpoint of the rating period.

Trended Claim PMPM

=
$$[BEP\ Paid\ and\ Incurred\ Claim\ PMPM] \times (1 + [Trend\%])^{Trend\ Months/12}$$

5. Develop *Projected Paid and Incurred Claim PMPM*:

 $Projected \ Paid \ and \ Incurred \ Claims \ PMPM \\ = [Trended \ Claim \ PMPM] \times [Benefit \ Adjustment] \\ \times [Morbidity \ Adjustment] \times [Other \ Adjustment]$

The *Benefit Adjustment*, *Morbidity Adjustment*, and *Other Adjustment* are discussed in the Projections Factors section above.

- 6. Develop *Projected Claims PMPM by Benefit* as follows:
 - a. CAIC uses an actuarial cost model to measure the impact of cost-sharing designs on cost and utilization amounts by service category. The cost model shows frequency per 1,000 per year by type of service (IP, OP, Professional), and allowed cost per service for each of the same types of service, normalized to a \$0 office visit copayment and a \$25 ER copayment. Given a particular benefit design (for example, \$20 office visit copayment), utilization is adjusted from the benchmark based on assumed utilization change factors, and cost per service is reduced by the copayment or coinsurance per service. Cost and utilization are multiplied together to derive a PMPM by service, summed for all services. The impact of global deductible, coinsurance, and out-of-pocket max is then measured based on cumulative probability distributions (CPDs), where the value of services that apply to the CPDs adjusts the level of the curve, as well as global utilization adjustments.
 - b. This actuarial cost model derives a Manual Cost for each benefit design in the experience period, as well as plans being offered in the projection period. The average Manual Cost of the experience is compared to the Manual Cost of the base plan. The projected experience period data is then adjusted to the base plan:

$$Benefit\ Level\ Adjustment = rac{Average\ Manual\ Cost\ in\ Projection\ Period\ Manual\ Cost\ of\ Base\ Plan}{Manual\ Cost\ of\ Base\ Plan}$$

c. The *Projected Paid and Incurred Claim PMPM* (Step 5) is then adjusted to the Base Plan as follows:

$$Base\ Plan\ Paid\ and\ Incurred\ Claims\ PMPM \\ = \frac{Benefit\ Adjusted\ Paid\ and\ Incurred\ Claims\ PMPM}{Benefit\ Level\ Adjustment}$$

d. Each additional benefit design has its own unique Manual Cost, which can then be compared to the Base Plan to develop a Benefit Relativity:

$$Benefit \ Relativity \ A = \frac{Manual \ Cost \ of \ Benefit \ A}{Manual \ Cost \ of \ Base \ Plan}$$

- e. The Benefit Relativity developed in d. above is then used as a gauge to develop a final *Pricing Relativity*. This pricing relativity is developed using actuarial judgment including the following considerations:
 - i. Final premium relativities must make sense based on benefits. For example, the annual cost difference between a PPO 2000 and PPO 1000 must be less than \$1000.
 - ii. Adjustments for plan designs that fall outside of the actuarial cost model.
- a. So the Projected Claims PMPM by Benefit is:

Projected Claims PMPM Benefit A
= Projected Claims PMPM Base Plan
× Pricing Relativity A

- b. And to arrive at the *Total Projected Claims PMPM*, CAIC assumes a distribution of members across the benefit plans being offered in 2019. The *Total Projected Claims PMPM*:
- = Projected Claims PMPM Benefit $A \times Expected$ Member Dist of Benefit A + Projected Claims PMPM Benefit $B \times Expected$ Member Dis of Benefit $B + \cdots$
- 7. The Paid-To-Allowed Ratio is then:

 $\textit{Paid to Allowed Ratio} = \frac{\textit{Total Projected Claims PMPM}}{\textit{Projected Allowed Claims at Current Benefits}}$

See Exhibit G for the development of the *Paid-to-Allowed Ratio*. And see Exhibit L for the plan-level projected incurred amount development.

Risk Adjustment

Projected Risk Adjustments PMPM:

Relevant to 2020 pricing is the impact of Commercial Risk Adjustment (CRA) payment transfers that are expected to be earned in 2020. The following items are those that we deem important in generating a CRA payment transfer adjustment:

- 1. Risk profile of the those enrolled in CRA eligible plans for the market or state (i.e. competitors) relative to risk profile of CRA eligible membership enrolled in our plans
- 2. Statewide average premiums
- 3. Current market penetration of this company and competitors in the market and in the state
- 4. 2016-2017 risk adjustment results

5. Market improvement in coding risk: CBC's ACA book of business has had a churn rate that makes a multi-year perspective of member diagnosis and risk very challenging. Because closing gaps in care and coding, and a myriad of other risk adjustment functions require more than a single year of data to facilitate an accurate depiction of risk, it is believed that CBC is disadvantaged in the market. This will drive CBC's relative risk to the market down over time.

Market Adjusted Index Rate

The Market Adjusted Index Rate is calculated as the Index Rate adjusted for all allowable market-wide modifiers defined in the market rating rules, 45 CFR Part 156.80(d)(1). So,

[Market Adjusted Index Rate]

- $= ([Index\ Rate]\ x\ [Paid\ to\ Allowed\ Ratio]$
- [Net Projected ACA Reinsurace Recoveries]
- [Net Projected Risk Adjustments PMPM] + [Exchange Fees PMPM])
- ÷ [Paid to Allowed Ratio]

See Exhibit K for the development of the Market Adjusted Index Rate.

Retention Items

Administrative Expense Load:

- 1. Risk Adjustment User Fee: To fund the HHS-risk adjustment program, issuers will remit to HHS a fee of \$0.18 PMPM. The Risk Adjustment Fee PMPM is included in URRT Worksheet 1, URRT Worksheet 2, "Administrative Expense", and PA Rate Exhibits Table 6.
- 2. Administrative Expense: Calculated using an allocation method from CBC's Finance department, and trended to the rating period. Costs are allocated according to results reported through a company-wide questionnaire. On an annual basis, each cost center within the company completes a questionnaire listing the distribution of costs (in percentage terms) by product as well as by market segment. For example, the questionnaire will ask what percentage of time is spent on PPO versus HMO versus Drug versus Medicare. And separately will ask what percentage of time is spent on large group, small group, individual, and government programs. Using those distributions, all costs needed to perform the business are allocated to the proper market segments and lines of business. The administrative expense applied in the rate development is the total expense allocated to CBC individual products. Administrative expenses are included in URRT Worksheet 2, "Administrative Expense", and PA Rate Exhibits Table 6. Expense as a percentage of premium vary by plan because a fixed dollar admin PMPM is applied to each plan.
- 3. Broker Expense: Calculated based on CBC's explicit per contract broker fee. Broker Expense is included in URRT Worksheet 2, "Administrative Expense", and PA Rate Exhibits Table 6. CBC pays commissions for new business and renewal enrollment received during open enrollment, both on and off exchange, and in all geographic

areas. Commission is less on catastrophic plans due to the lower premium. CBC does not pay commission during Special Enrollment Periods (SEP). The 2020 broker commission schedule is yet to be finalized. Attached please find the 1/1/2019 copy of the broker agreement – redacted version. Files are as follows:

- a. Redacted Agent Agreement: "Ind_19 41 Initial CAIC PPO WBEBrokerIndRedacted Supporting 20190521.pdf"
- b. Redacted Preferred Producer Master Agreement: "Ind_19-41_Initial_CAIC_PPO_PPMABrokerIndRedacted_Supporting_20190521.pdf"
- 4. Value-Based Benefits (VBB): Standard with each plan, Capital BlueCross includes wellness incentives to maximize the likelihood that consumers make positive behavioral changes, which lead to better health, and curbed health care costs for employers and employees alike. The incentive is as follows:
 - a. Complete Health Risk Assessment questionnaire and receive a gift card.
 - b. Participate in an online coaching program and receive a gift card reward.
 - c. The wellness program is administered through a vendor and costs are based on vendor fees, anticipated participation, and reward card amounts.
 - d. Fees are included in overall administrative expense fee discussed above.
 - e. Included in URRT Worksheet 2 "Administrative Expense", and PA Rate Exhibits Table 6.
- 5. Identity Theft Coverage: Identity protection offering will include the following components:
 - a. Credit monitoring Monitors activity that may affect credit
 - b. Fraud detection Identifies potentially fraudulent use of identity or credit
 - c. Fraud resolution support Assists members in addressing issues that arise in relation to credit monitoring and fraud detection
 - d. Included in URRT Worksheet 1, "Administrative Load", and PA Rate Exhibits Table 6.
- 6. Additional Quality Improvement: The Final Notice of Benefit and Payment Parameters (NBPP) for 2020 finalized the rule to allow issuers to apply a standard 0.8% of premium for quality improvement (QI) measures in the MLR calculation. Additional QI amounts applied in rating equal 0.4%. Included in URRT Worksheet 2, "Administrative Expense", and PA Rate Exhibits Table 6.

Profit (or Contribution to Surplus) & Risk Margin:

7. Contingency: Contingency is included in URRT Worksheet 1, "Profit and Risk", and PA Rate Exhibits Table 6.

Taxes and Fees:

1. Health Insurer Fee (HIF) – Section 9010 of PPACA and Section 1406 of the Reconciliation Act (which modified PPACA) refer to HIF. The fee is a fixed-dollar amount distributed across health insurance providers: \$8 billion in 2014, \$11.3 billion in 2015 and 2016, \$13.9 billion in 2017, \$14.3 billion in 2018, and the HIF increases by the rate of premium growth for 2019 and subsequent years. There was a moratorium on the

- fee for 2017 and there is a suspension on the fee for 2019. HIF is included in URRT Worksheet 2, "Taxes and Fees", and PA Rate Exhibits, Table 6.
- 2. Exchange Fee All issuers participating in a federally-facilitated exchange will remit 3% of premium to HHS. The exchange user fee is applied as an adjustment to the Index Rate at the market level. CAIC only offers off-exchanges products, therefore no exchange fee is applied.
- 3. Federal Income Tax: Federal Income Tax will be collected on the 2% contingency built into the premium. The projected Federal Income Tax is included in URRT Worksheet 2, "Taxes and Fees", and PA Rate Exhibits, Table 6.
- 4. Premium Tax: CAIC is charged premium tax of 2%. Premium tax is included in URRT, Worksheet2, "Taxes and Fees" and PA Rate Exhibits, Table 6.

See Exhibit H for all retention values.

Plan Rate Development

The Plan Adjusted Index Rates are included in Worksheet 2, Section IV of URRT.

The following adjustments were used to derive the Plan Adjusted Index Rate:

- 1. Actuarial Value and Cost Sharing adjustment: The Actuarial Value and Cost Sharing Adjustment is determined using CAIC's actuarial cost model. CAIC uses an actuarial cost model to measure the impact of cost-sharing designs on cost and utilization amounts by service category. The cost model shows frequency per 1,000 per year by type of service (IP, OP, Professional), and allowed cost per service for each of the same types of service, normalized to a \$0 office visit copayment and a \$25 ER copayment. Given a particular benefit design (for example, \$20 office visit copayment), utilization is adjusted from the benchmark based on assumed utilization change factors, and cost per service is reduced by the copayment or coinsurance per service. Cost and utilization are multiplied together to derive a claim PMPM by service, summed for all services. The impact of global deductible, coinsurance, and out-of-pocket max is then measured based on CPDs, where the value of services that apply to the CPDs adjusts the level of the curve, as well as global utilization adjustments.
- 2. Induced Demand: Please see Table 8
- 3. Provider Network: The Provider network is the same across all PPO plans. A network factor is applied to adjust HMO base data to PPO (1.6% for OON medical benefits).
- 4. Adjustment for benefits in addition to EHBs: No benefits other than EHBs are included in the plans, so no adjustment is necessary.
- 5. Catastrophic Plans: Applied to catastrophic plans to reflect lower morbidity.
- 6. Adjustment for distribution and administrative costs: Described in <u>Retention</u> section above.
- 7. Tobacco Adjustment: Calculated as the average tobacco factor applied across the risk pool.

The development of the Plan Adjusted Index rate is found in Exhibit L, and summarized in Exhibit M.

Plan Premium Development for 21-Year-Old Non-Tobacco User

Age Curve Calibration: The average age factor is calculated by taking the member-weighted average of current individual enrollment by age in CAIC. Age factors are applied in accordance with CMS's Standard Age Curve. The age calibration factor is adjusted for contracts with greater than three children under the age of 21. Please see file Ind_19-42_Initial_CAIC_PPO_List-Billed_Supporting_20190521 for the calculation.

Geographic Factor Calibration: The average geographic rating factor is calculated by taking the CAIC member-weighted average by region.

Geographic Factors: CBC performed regional analysis to quantify the cost difference between the three regions in our service area. The analysis gathered incurred claims net Rx rebates, projected risk adjustment, and premium for a 12-month period by region. The loss ratio of each region is then compared to the average loss ratio for the book of business. In theory, the change in regional rating factor is:

```
[Change in Regional Rating Factor Region A] = [Region A LR] \div [BOB LR]
```

But our preferred approach is to gradually change factors, so not to shock the market, while moving rates in the appropriate direction. In order to do this, the following approach is being proposed:

```
[Change in Regional Rating Factor Region A] = [Region A LR] \div [Target LR]
```

Where Target LR is in between Region A LR and BOB LR. With this gradual approach, annual rate change by region is shown on Exhibit Q, column G.

Tobacco Factor Calibration: Average tobacco factor is calculated using current month member by smoking status data.

The calibration is:

```
[Calibrated Plan Adjusted Index Rate] = [Plan Adjusted Index Rate] \div ([Age Curve Calibration] \times [Geographic Factor Calibration] \times [Tobacco Factor])
```

Calibrated Plan Adjusted Index Rates are found on PA Rate Exhibits Table 10. The calibration factors and development are found on Exhibit N.

Consumer Adjusted Premium Rate Development

The Consumer Adjusted Premium Rate is developed as follows:

1. Member-Level Consumer Adjusted Premium Rate:

```
[Member - Level Consumer Adjusted Premium Rate] \\ = [Calibrated Plan Adjusted Index Rate] \times [Age Factor] \\ \times [Geographic Factor] \times [Tobacco Factor]
```

[Family Consumer Adjusted Premium Rate] = ∑[Member –
 Level Consumer Adjusted Premium Rate]
 With no more than three child dependents under age 21 taken into account

All consumer-level adjustments are applied uniformly to all plans in the Single Risk Pool. These adjustments do not vary by plan. Age and Geographic factors are displayed in Exhibits O.

Base Rates, i.e. Calibrated Plan Adjusted Index Rates, are found on Exhibit P.

AV Metal Values

The AV Metal Values included in URRT Worksheet 2 and PA Rate Exhibits, Table 10 were based on the federally issued AV Calculator.

See AV Screenshots included with the submission.

AV Pricing Values

All AV Pricing values were developed using CAIC's actuarial cost model and actuarial judgment as described in section Paid to Allowed above. Differences in health status are not included.

Projected Loss Ratio

See Exhibit I for the projected loss ratio calculation. The projected loss ratio is calculated using the federally prescribed MLR methodology.

Membership Projection

The membership projections found in Worksheet 2 of URRT were developed by assuming moderate growth and similar distribution to current.

Attachments and Examples

The following is a list of Exhibits and Data to support this filing:

PA Rate Exhibits Part I through Part V

Table 8

Exhibit A – Benefit Summary

Exhibit B – Benefit Change Summary

Exhibit C – Benefit Categories

Exhibit D – Benefit Mix

Exhibit E – Trend

Exhibit F – URRT

Exhibit G – Paid-to-Allowed Development

Exhibit H – Retention

Exhibit I – Projected Loss Ratio

Exhibit J – Index Rate

Exhibit K – Market Adjusted Index Rate

Exhibit L – Rate Development by Plan

Exhibit M – Plan Adjusted Index Rates

Exhibit N – Calibration

Exhibit O – Rating Factors

Exhibit P – Quarterly Base Rates

Exhibit Q – Regional Analysis

Broker Contracts
Actuarial Value Screenshots
List-Billed Data

Actuarial Statement

I, ASA, MAAA, am of the opinion that this filing is in compliance with the applicable Federal and State Laws and Regulations concerning the Patient Protection and Affordable Care Act and the Health Care and Education Reconciliation Act of 2010.

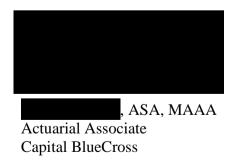
I, ASA, MAAA, do hereby certify that:

- 1. This filing has been prepared in accordance with the following:
 - a. Actuarial Standard of Practice No. 5, "Health and Disability Claims"
 - b. Actuarial Standard of Practice No. 8, "Regulatory Filings for Rates and Financial Projections for Health Plans"
 - c. Actuarial Standard of Practice No. 12, "Risk Classification"
 - d. Actuarial Standard of Practice No. 23, "Data Quality"
 - e. Actuarial Standard of Practice No. 25, "Credibility Procedures Applicable to Accident and Health, Group Term Life, and Property/Casualty Coverage"
 - f. Actuarial Standard of Practice No. 26, "Compliance with Statutory and Regulatory Requirements for the Actuarial Certification of Small Employer Health Benefit Plans"
 - g. Actuarial Standard of Practice No. 41, "Actuarial Communications".

2. The index rate is:

- a. Projected in compliance with all applicable state and federal statutes and regulations (45 CFR 156.80(d) (1)).
- b. Developed in compliance with the applicable Actuarial Standards of Practice.

- c. Reasonable in relation to the benefits provided and the population anticipated to be covered.
- d. Neither excessive nor deficient.
- e. Adjusted by only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) to generate plan level rates.
- 3. The percent of total premium that represents essential health benefits were calculated in accordance with actuarial standards of practice.
- 4. 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, and in accordance with CFR 156.135(b)(2) as necessary. For any plan requiring an alternative method, 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 benefits that deviate substantially from the parameters of the AVC and have a material impact on the actuarial value.
 - a. The analysis was
 - i. conducted by a member of the American Academy of Actuaries, and
 - ii. performed in accordance with generally accepted actuarial principles and methods.
- 5. Geographic area rating factors reflect only differences in the costs of delivery and not differences due to population morbidity.
- 6. All factor, benefit and other changes from the prior approved filing have been disclosed in the actuarial memorandum.
- 7. New plans cannot be considered modifications of existing plans under the uniform modification standards in 45 CFR 147.106.
- 8. The information presented in the PA Actuarial Memorandum and PA Actuarial Memorandum Rate Exhibits is consistent with the information presented in the Rate Filing Justification.





CAPITAL ADVANTAGE INSURANCE COMPANY, INC. RFJ Part II – Consumer Friendly Justification

Changes being requested are based upon consideration of the factors that influence future period cost structures. The primary drivers of change in future costs are:

- o Anticipated increase in facility and physician unit costs
- o Anticipated changes in prescription drug unit costs
- o Continuing change in utilization such as
 - Intensity of medical services rendered
 - Changes in place of service (e.g. continued migration of inpatient stays to outpatient setting)
 - Further migration from brand prescription drugs to generic prescription drugs
 - Favorable impacts of value based benefits designs
- o Prescription drug patent expirations and new to market brand drugs
- Leveraging associated with unchanged cost share components such as deductible and copays
- o Reimplementation of the Health Insurer Fee in 2020
- o Inflation adjustment to administrative expenses

Rates Table Template v9.0	If you are in a community rating state If you are not in a community rating of If Tobacco is Tobacco User/Non-Tol	e, select Family-Tier Rates under Rating	ting Method and provide an Individual Rate acco Use and Non-Tobacco Use.		
HIOS Issuer ID* Federal TIN* Rate Effective Date*	82799 23-2195219 1/1/2020				
Rate Expiration Date*	12/31/2020 Age-Based Rates				
Plan ID*	Rating Area ID*	Tobacco*	Age*	Individual Rate*	Individual Tobacco Rate*
Required: Enter the 14-character Plan ID	Required: Select the Rating Area ID	Required: Select if Tobacco use of subscriber is used to determine if a person is eligible for a rate from		Required: Enter the rate of an Individual Non-Tobacco or E No Preference enrollee on a plan	Required: nter the rate of an Individual tobacco enri on a plan
82795PA0140001	, •	Tobacco User/Non-Tobacco User	0-14	183.20	183
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	15 16 17	199.49 205.71 211.94	199 205 211
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	18	218.65 225.35	218 225
82795PA0140001 82795PA0140001	•	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	20 21	232.30 239.48	232 245
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	22 23	239.48 239.48	245 245
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	24 25	239.48 240.44	24: 24:
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	26 27 28	245.23 250.98 260.31	25 25 26
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	29	267.98 271.81	27 27 27
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	31 32	277.56 283.30	28
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	33	286.90 290.73	29 29
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	35 36	292.64 294.56	29 30
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	37 38	296.48 298.39	30 30
82795PA0140001 82795PA0140001	•	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	39 40	302.22 306.06	30 32
82795PA0140001 82795PA0140001	•	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	41 42	311.80 317.31	33 34
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	43	324.97 334.55	34 35
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	45 46	345.81 359.22	38 39
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	47	374.31 391.55	41
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	49 50	408.55 427.71	49
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	51 52 53	446.63 467.46	51 53
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	53 54 55	488.54 511.29 534.04	56 58 64
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	56 57	558.71 583.61	67
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	58 59	610.20 623.37	73
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	60	649.95 672.94	81 84
82795PA0140001 82795PA0140001	Rating Area 6	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	62 63	688.03 706.94	86 88
82795PA0140001 82795PA0140001		Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	64 and over 0-14	718.43 196.03	89 19
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	15 16	213.45 220.11	21 22
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	17 18	226.78 233.95	22
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	19 20	241.13 248.56	24
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	21 22 23	256.24 256.24	26
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	23	256.24 256.24 257.27	26 26 26
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	26 27	262.39 268.54	26
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	28	278.54 286.74	28
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	30 31	290.84 296.99	29
82795PA0140001 82795PA0140001		Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	32 33	303.14 306.98	31 31
82795PA0140001 82795PA0140001		Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	34	311.08 313.13	31 32
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	36 37	315.18 317.23	32 32
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	38 39	319.28 323.38	32 33
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	40	327.48 333.63	38 38
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	42	339.52 347.72	36
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	44 45 46	357.97 370.02 384.37	38 40 42
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	47	400.51 418.96	4-
82795PA0140001 82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	49	437.15 457.65	4:
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	51 52	477.89 500.19	5- 5- 5-
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	53 54	522.74 547.08	66
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	55 56	571.42 597.82	6
82795PA0140001 82795PA0140001	Rating Area 7 Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	57 58	624.47 652.91	7 7
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	59 60	667.00 695.45	8 8
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	61 62	720.04 736.19	9 9
82795PA0140001 82795PA0140001	Rating Area 7	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	63 64 and over	756.43 768.72	9.
82795PA0140001 82795PA0140001	Rating Area 9	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	0-14	185.03 201.48	18 20
82795PA0140001 82795PA0140001	Rating Area 9	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	16 17	207.77 214.06	20
82795PA0140001 82795PA0140001	Rating Area 9	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	18	220.83 227.60	22
82795PA0140001 82795PA0140001	•	Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User Tobacco User/Non-Tobacco User	20 21 22	234.62 241.87	23

82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	23	241.87	247.92
	0001 Rating Area 9	Tobacco User/Non-Tobacco User	24	241.87	247.92
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	25	242.84	248.91
	0001 Rating Area 9	Tobacco User/Non-Tobacco User	26	247.68	253.87
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	27	253.48	259.82
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	28	262.92	269.49
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	29	270.66	277.42
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	30	274.53	281.39
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	31	280.33	
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	32	286.14	293.29
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	33	289.77	297.01
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	34	293.64	300.98
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	35	295.57	302.96
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	36	297.51	304.94
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	37	299.44	306.93
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	38	301.38	308.91
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	39	305.25	312.88
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	40	309.12	332.30
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	41	314.92	338.54
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	42	320.48	344.52
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	43	328.22	352.84
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	44	337.90	363.24
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	45	349.27	384.19
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	46	362.81	399.09
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	47	378.05	415.86
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	48	395.47	435.01
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	49	412.64	453.90
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	50	431.99	496.79
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	51	451.10	
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	52	472.14	542.96
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	53	493.42	567.44
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	54	516.40	593.86
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	55	539.38	647.26
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	56	564.29	677.15
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	57	589.45	707.34
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	58	616.30	739.56
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	59	629.60	755.52
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	60	656.45	
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	61	679.67	849.59
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	62	694.91	868.63
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	63	714.01	892.52
82795PA0140	0001 Rating Area 9	Tobacco User/Non-Tobacco User	64 and over	725.61	907.03

Capital Advantage Insurance Company Individual Rates

Effective 1/1/2020 Benefit Summary

INDIVIDUAL PORTFOLIO

Changes	Plan Name	HIC	OS ID	Deductible	Coinsurance	Out-of-Pocket	PCP	Specialist	Emergency	Urgent	IP Hospital	Hi-Tech Imaging	Lab	OP Surgery	Small Group: Rx \$0	Small Group: Rx \$250 (brand only deductible)
				(2x Family)		Maximum			Room	Care	per day,		Ind Hos	ASC ACH	Individual: Rx	Individual: N/A
											maximum of 5 days	5				
		Small Group: Rx \$0	Small Group: Rx \$250													
		Individual: Rx	(brand only deductible)													
			Individual: N/A	In-Network	In-Network	In-Network	In-Network	In-Network	In-Network	In-Network	In-Network	In-Network	In-Network	In-Network		
										PLATINUM PR	ODUCTS					
										GOLD PROD	DUCTS					
										SILVER PROI	DUCTS					
										BRONZE PRO	DUCTS					
1 Changes	Catastrophic PPO 8150/0/75	82795PA014000100		\$0	815000%	\$0	\$8,150	\$75	D	D	D	N/A	D D	D D	Rx Ded: \$D, Rx Gen - Ded Applies? Combined, Retail: Y/0/0/0, Mail: 0/0/0/0	

1 Drug copays listed are Preferred Generic/Non-Preferred Generic/Preferred Brand/Non-Preferred Brand

2 Speciality drug coverage = 20% up to \$250 per fill/20% up to \$350 per fill/20% up to \$450 per fill

3 Tiered Lab benefits. Independent labs | Hospital based labs

4 D = Deductible D/\$ = Deductible applies first then a copay

5 Plan naming convention = Metal level, Plan type, Deductible/Coinsurance/Office Visit Copay - HRA funding

6 CareConnect copays listed are for PCP directed care



Filing 19-42 8

7/11/2019

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Benefit Change Summary

						A	V	Pricir	ng AV	Metal	Level	HRA A	mount	Deductible(2x Family)	Coinst	ırance	MO	OP
Line	On/Off Exchan	ge New/Existing	HIOS	Med Description	Rx Description	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020
1	On Exchange	Existing	45127PA002001301	Gold PPO 2150/10/20	Combined w/Med	76.0%	76.1%	73.9%	71.8%	Gold	Gold	0	0	2,000	2,150	10%	10%	7,350	8,150
2	Off Exchange	Existing	45127PA002002100	Silver PPO 5950/20/40	Combined w/Med	68.3%	66.9%	62.5%	60.4%	Silver	Silver	0	0	4,950	5,950	10%	20%	7,350	8,150
3	On Exchange	Existing	45127PA002000801	Silver PPO 6000/20/40	Combined w/Med	68.2%	66.9%	62.4%	60.1%	Silver	Silver	0	0	5,000	6,000	10%	20%	7,350	8,150
4	On Exchange	Existing	45127PA002000804	Silver PPO 6000 CSR73	Combined w/Med	73.4%	72.3%	62.4%	60.1%	Silver	Silver	0	0	4,500	5,500	8%	15%	5,850	6,500
5	On Exchange	Existing	45127PA002000805	Silver PPO 6000 CSR87	Combined w/Med	86.6%	86.2%	62.4%	60.1%	Gold	Gold	0	0	1,200	1,500	5%	5%	2,450	2,450
6	On Exchange	Existing	45127PA002000806	Silver PPO 6000 CSR94	Combined w/Med	94.2%	93.3%	62.4%	60.1%	Platinum	Platinum	0	0	250	450	0%	0%	1,250	1,250
7	On Exchange	Existing	45127PA002002001	Bronze PPO 8000/0/60	Combined w/Med	62.6%	62.2%	54.4%	53.3%	Bronze	Bronze	0	0	7,350	8,000	0%	0%	7,350	8,150
8	Off Exchange	Existing	53789PA010000800	Bronze HMO 8000/0/60	Combined w/Med	62.6%	62.2%	54.7%	53.3%	Bronze	Bronze	0	0	7,350	8,000	0%	0%	7,350	8,150
9	Off Exchange	Existing	53789PA010000400	Catastrophic HMO 8150/0/75	Combined w/Med	60.0%	60.8%	53.4%	52.5%	Bronze	Bronze	0	0	7,900	8,150	0%	0%	7,900	8,150
10	Off Exchange	Existing	82795PA014000100	Catastrophic PPO 8150/0/75	Combined w/Med	60.0%	60.8%	53.4%	52.5%	Bronze	Bronze	0	0	7,900	8,150	0%	0%	7,900	8,150

Filing 19-42 9

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Benefit Change Summary

	ACA	A PCP	Non-A	CA PCP	S	PC	F	R	U	JC	IP Hosp Co	pay Per Day	Hi-Tech	Imaging	Low End	l Imaging	Lab Inde	ependent	Lab Hosp	ital-Based	OP Sur	g ASC
Line On/Off Exchange New/Existing HIOS Med Description Rx Description	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020
1 On Exchange Existing 45127PA002001301 Gold PPO 2150/10/20 Combined w/Med	20	20	20	20	45	45	D/300	D/300	75	75	N/A	N/A	D/25%	D/25%	D/10%	D/10%	25	25	D/75	D/75	250	250
2 Off Exchange Existing 45127PA002002100 Silver PPO 5950/20/40 Combined w/Med	30	40	30	40	75	85	D/400	D/400	75	100	N/A	N/A	D/25%	D/35%	D/10%	D/20%	25	25	D/75	D/75	250	250
3 On Exchange Existing 45127PA002000801 Silver PPO 6000/20/40 Combined w/Med	30	40	30	40	75	85	D/400	D/400	75	100	N/A	N/A	D/25%	D/35%	D/10%	D/20%	25	25	D/75	D/75	250	250
4 On Exchange Existing 45127PA002000804 Silver PPO 6000 CSR73 Combined w/Med	10	10	10	10	20	20	D/200	D/200	45	45	N/A	N/A	D/18%	D/25%	D/8%	D/15%	20	20	D/60	D/60	200	200
5 On Exchange Existing 45127PA002000805 Silver PPO 6000 CSR87 Combined w/Med	5	5	5	5	10	10	D/75	D/75	35	35	N/A	N/A	D/15%	D/15%	D/5%	D/5%	15	15	D/40	D/40	100	100
6 On Exchange Existing 45127PA002000806 Silver PPO 6000 CSR94 Combined w/Med	3	3	3	3	5	5	D/50	D/50	20	20	N/A	N/A	D/10%	D/10%	D	D	10	10	D/20	D/20	50	50
7 On Exchange Existing 45127PA002002001 Bronze PPO 8000/0/60 Combined w/Med	60	60	60	60	85	85	D	D	D	D	N/A	N/A	D	D	D	D	25	25	D	D	250	250
8 Off Exchange Existing 53789PA010000800 Bronze HMO 8000/0/60 Combined w/Med	60	60	60	60	85	85	D	D	D	D	N/A	N/A	D	D	D	D	25	25	D	D	250	250
9 Off Exchange Existing 53789PA010000400 Catastrophic HMO 8150/0/75 Combined w/Med	75	75	75	75	D	D	D	D	D	D	N/A	N/A	D	D	D	D	D	D	D	D	D	D
10 Off Exchange Existing 82795PA014000100 Catastrophic PPO 8150/0/75 Combined w/Med	75	75	75	75	D	D	D	D	D	D	N/A	N/A	D	D	D	D	D	D	D	D	D	D

7/11/2019 10

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Benefit Change Summary

						OP Su	rg AHC	R	x Ded	Rx Gen - I	Ded Applies?	Rx Ge	en Pref	Rx Gen	Non-Pref	Rx Bra	and Pref	Rx Brand	l Non-Pref	Rx Specialt	y Coin Tier 1	Rx Specialty	Max Tier 1	Rx Specialty	y Coin Tier 2	Rx Specialty	Max Tie
1e	On/Off Exchange	New/Existing	HIOS	Med Description	Rx Description	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020
	On Exchange	Existing	45127PA002001301	Gold PPO 2150/10/20	Combined w/Med	D/10%	D/10%	Combined	Combined	N	N	10	10	0	0	25	25	75	75	40%	40%	800	800	40%	40%	1000	100
	Off Exchange	Existing	45127PA002002100	Silver PPO 5950/20/40	Combined w/Med	D/10%	D/20%	Combined	Combined	N	N	10	10	0	0	50	50	100	100	50%	50%	800	800	50%	50%	1000	10
: [On Exchange	Existing	45127PA002000801	Silver PPO 6000/20/40	Combined w/Med	D/10%	D/20%	Combined	Combined	N	N	10	10	0	0	50	50	100	100	50%	50%	800	800	50%	50%	1000	10
1	On Exchange	Existing	45127PA002000804	Silver PPO 6000 CSR73	Combined w/Med	D/8%	D/15%	Combined	Combined	N	N	5	5	0	0	25	25	55	55	40%	40%	700	700	40%	40%	800	8
;	On Exchange	Existing	45127PA002000805	Silver PPO 6000 CSR87	Combined w/Med	D/5%	D/5%	Combined	Combined	N	N	3	3	0	0	15	15	40	40	30%	30%	400	400	30%	30%	500	5
	On Exchange	Existing	45127PA002000806	Silver PPO 6000 CSR94	Combined w/Med	D	D	Combined	Combined	N	N	2	2	0	0	10	10	25	25	10%	10%	200	200	10%	10%	300	3
,	On Exchange	Existing	45127PA002002001	Bronze PPO 8000/0/60	Combined w/Med	D	D	Combined	Combined	Υ	Υ	0	0	0	0	0	0	0	0	50%	50%	0	0	50%	50%	0	
3	Off Exchange	Existing	53789PA010000800	Bronze HMO 8000/0/60	Combined w/Med	D	D	Combined	Combined	Υ	Υ	0	0	0	0	0	0	0	0	50%	50%	0	0	50%	50%	0	
9	Off Exchange	Existing	53789PA010000400	Catastrophic HMO 8150/0/75	Combined w/Med	D	D	Combined	Combined	Υ	Υ	0	0	0	0	0	0	0	0	0%	0%	0	0	0%	0%	0	
	Off Exchange	Existing	82795PA014000100	Catastrophic PPO 8150/0/75	Combined w/Med	D	D	Combined	Combined	Y	Υ	0	0	0	0	0	0	0	0	0%	0%	0	0	0%	0%	0	

Filing 19-42

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Benefit Change Summary

						Rx Gen	Pref Coins	Rx Gen Nor	-Pref Coins	Rx Brand	Pref Coin	Rx Brand No	on-Pref Coins	Rx Gen Pre	f Mail Copay	Rx Gen Non-P	ref Mail Copay	Rx Brand Pr	ef Mail Copay	Rx Brand Non-I	Pref Mail Copa
Line	On/Off Exchange	ge New/Existing	HIOS	Med Description	Rx Description	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020
1	On Exchange	Existing	45127PA002001301	Gold PPO 2150/10/20	Combined w/Med	0%	0%	25%	25%	0%	0%	0%	0%	20	20	0	0	50	50	150	150
2	Off Exchange	Existing	45127PA002002100	Silver PPO 5950/20/40	Combined w/Med	0%	0%	25%	25%	0%	0%	0%	0%	20	20	0	0	100	100	200	200
3	On Exchange	Existing	45127PA002000801	Silver PPO 6000/20/40	Combined w/Med	0%	0%	25%	25%	0%	0%	0%	0%	20	20	0	0	100	100	200	200
4	On Exchange	Existing	45127PA002000804	Silver PPO 6000 CSR73	Combined w/Med	0%	0%	18%	18%	0%	0%	0%	0%	10	10	0	0	50	50	110	110
5	On Exchange	Existing	45127PA002000805	Silver PPO 6000 CSR87	Combined w/Med	0%	0%	15%	15%	0%	0%	0%	0%	6	6	0	0	30	30	80	80
6	On Exchange	Existing	45127PA002000806	Silver PPO 6000 CSR94	Combined w/Med	0%	0%	10%	10%	0%	0%	0%	0%	4	4	0	0	20	20	50	50
7	On Exchange	Existing	45127PA002002001	Bronze PPO 8000/0/60	Combined w/Med	0%	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
8	Off Exchange	Existing	53789PA010000800	Bronze HMO 8000/0/60	Combined w/Med	0%	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
9	Off Exchange	Existing	53789PA010000400	Catastrophic HMO 8150/0/75	Combined w/Med	0%	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
10	Off Exchange	Existing	82795PA014000100	Catastrophic PPO 8150/0/75	Combined w/Med	0%	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0

Filing 19-42

Exhibit C_BeneCa

7/11/2019

Effective 1/1/2020 Benefit Categories IP OP Professional Type of Service Inpatient IP - CABG Inpatient IP - Cesarean Maternity Delivery IP - Major Joint Procedures of Lower Extremity Inpatient Inpatient IP - Maternity Non-delivery

> Inpatient Inpatient

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Filing 19-42

IP - Medical

IP - Neonatal IP - Newborn

IP - Normal maternity delivery IP - Other Cardiovascular Procedures

IP - Other Surgical

IP - Psychiatric

IP - Substance Abuse

IP - Ungroupable OP - Blood

OP - Cardiac Rehab

OP - Cardiovascular OP - Dialysis

OP - Emergency Room

OP - Maternity Non-delivery Care

OP - Observation Room

OP - Other OP Services OP - PT/OT/ST

OP - Pathology/Lab

OP - Pharmacy

OP - Psychiatric OP - Radiology - CT/MRI/PET

OP - Radiology - General

OP - Substance Abuse

OP - Surgery

OP - Unmapped

ADDL Benefits Other

Hearing Aids

IP Visits - IP Psychiatric

IP Visits - IP Substance Abuse

IP Visits - Medical

Inpatient Surgery - Primary Surgeon

Inpatient Surgery - Anesthesia

Inpatient Surgery - Assistant Surgeon

Maternity - Cesarean Deliveries

Maternity - Non Deliveries

Maternity - Normal Deliveries

Office Administered Drugs

Office/Misc - Allergy Immunotherapy

Office/Misc - Allergy Testing

Office/Misc - Misc. Medical Office/Misc - Office/Home Visits

Office/Misc - Urgent Care Other Physician - Cardiovascular

Other Physician - Chiropractor

Other Physician - Consults

Other Physician - Emergency Room Visits

Other Physician - Physicial Therapy

Pathology/Lab - IP

Preventive care - Hearing/Speech Exams

Preventive care - Immunization Preventive care - Other

Preventive care - Physical Exams

Preventive care - Well Baby Exams

Radiology - IP

Unmapped

Hearing Aids

IP Visits - Medical

Independent Lab

Maternity - Cesarean Deliveries Maternity - Non Deliveries

Maternity - Normal Deliveries

OP Visits - OP Psychiatric OP Visits - OP Substance Abuse

Office Administered Drugs

Office/Misc - Allergy Immunotherapy

Office/Misc - Allergy Testing Office/Misc - Misc. Medical

Office/Misc - Office/Home Visits

Office/Misc - Urgent Care

Other Physician - Cardiovascular Other Physician - Chiropractor

Other Physician - Consults

Other Physician - Emergency Room Visits

Other Physician - Physicial Therapy

Outpatient Surgery - Anesthesia

Outpatient Surgery - Office

Outpatient Surgery - Outpatient Facility

Pathology/Lab - OP

Pathology/Lab - Office

Preventive care - Hearing/Speech Exams

Preventive care - Immunization

Preventive care - Other

Preventive care - Physical Exams

Preventive care - Well Baby Exams

Radiology - OP - CT/MRI/PET

Radiology - OP - General Radiology - Office - CT/MRI/PET

Radiology - Office - General

Unmapped Unmapped

OP - Ambulance

OP - DME OP - Home Health/PDN

OP - Medical Surgical Supplies

Dental

Other - Ambulance

Other - DME

Other - Glassess/Contacts

Other - PDN/Home Health

Other - Prosthetics

Preventive care - Vision Exams

Dental Other - Ambulance

Other - DME

Other - Glassess/Contacts Other - PDN/Home Health

Other - Prosthetics

Preventive care - Vision Exams

ADDL Benefits Other

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Benefit Mix Changes

Average in Experience Period
Average in Rating Period
Benefit Mix Adjustment

Med Manual Cost PMPM

Rx Manual Cost PMPM

247.26

242.75

Benefit Mix Adjustment

0.98

BEP Manua	l Cost Calculation			247.26	Projected 2020 Manual C	243	752
			Manual Cost				Proj Member
Company	HIOS 14 Digit	Med Plan	<u>PMPM</u>	BEP MM	Mapped 2019 Plan	<u>Total</u>	<u>Dist</u>
KHPC	53789PA0100008	HMOIJ840	248.18	17,013	82795PA0140001	242.75	752
KHPC	53789PA0100004	HMOIJ839	244.4573	5,555			

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020

Trend

	<u>Yea</u>	<u>ar 1</u>	Year 2					
<u>Category</u>	Cost	<u>Util</u>	Cost	<u>Util</u>	Induced Demand	Total Year 1	Total Year 2	Weights
Inpatient Hospital	5.70%	2.30%	6.30%	2.30%	0.0%	8.1%	8.7%	44.6%
Outpatient Hospital	5.30%	2.30%	6.00%	2.30%	0.0%	7.7%	8.4%	26.1%
Professional	4.00%	1.80%	3.70%	1.80%	0.0%	5.9%	5.6%	26.5%
Other Medical	5.30%	2.00%	6.00%	2.00%	0.0%	7.4%	8.1%	2.8%
Capitation	3.00%	0.00%	3.00%	0.00%	0.0%	3.0%	3.0%	0.0%
Prescription Drug	8.90%	0.40%	8.70%	1.30%	0.0%	9.3%	10.1%	100.0%
Dental & Vision	1.00%	2.00%	1.00%	2.00%	0.0%	3.0%	3.0%	100.0%

Aggregate Pricing Trend Year 1								
Total	7.6%							
Medical	7.4%							
Drug	9.3%							
Agg Med + Rx Trend	7.6%							
Dental and Vision 3.0%								

Aggregate Pricing Trend Year 2			
Total	8.1%		
Medical	7.8%		
Drug	10.1%		
Agg Med + Rx Trend	8.0%		
Dental and Vision	3.0%		

<u>Year 1 Raw Trends</u>

Utilization Composite Cost Utilization

Year 2 Raw Trends

Utilization

URRT Categories Cost **Utilization** Composite **Utilization** Composite Cost Inpatient Hospital 5.8% 2.25% 6.5% 5.2% 2.25% 7.6% Outpatient Hospital 4.8% 2.25% 7.2% 5.5% 2.25% 6.5% Professional 5.3% 3.2% 4.9% 3.5% 1.75% 1.75% Other Medical 4.8% 2.00% 6.9% 5.5% 2.00% 5.0% Capitation 3.0% 0.0% 3.0% 3.0% 0.0% 3.0% Prescription Drugs 7.6% 0.4% 8.1% 7.4% 1.3% 7.7% Dental & Vision 1.0% 2.0% 3.0% 2.0% 3.0% 1.0%

Adjustments to Pricing Trend

	<u>Medical</u>	<u>Drug</u>		
Intensity	0.5%	Contracting	-0.20%	
Leveraging	0.0%	Leveraging	0.00%	
Demographics	0.0%	Demographics	0.00%	
Buy-Downs	0.0%	Buy-Downs	0.00%	
Other	0.0%	Pipeline	1.50%	
Total	0.5%	Total	1.30%	

*Adjustments in Drug Trend Model

*From Hos

Filing 19-42 15 7/11/2019

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 URRT

Experience Period Member Months

22,568

Section II: Projections		Y	ear 1 Trend	Y	ear 2 Trend		_				
							Trended EHB				
	Experience Perio	od Index Rate					Allowed Claims				
Benefit Category	PMPM		Cost	Utilization	Cost	Utilization	PMPM	Incurred	Allowed	PI	MPM
Inpatient Hospital	\$	67.21	1.057	1.023	1.063	1.023	79.03	\$ 1,344,383	\$ 1,516,777	\$	67.21
Outpatient Hospital	\$	139.39	1.053	1.023	1.060	1.023	162.82	\$ 2,024,374	\$ 3,145,654	\$	139.39
Professional	\$	60.13	1.040	1.018	1.037	1.018	67.20	\$ 811,689	\$ 1,357,036	\$	60.13
Other Medical	\$	12.09	1.053	1.020	1.060	1.020	14.04	\$ 180,002	\$ 272,854	\$	12.09
Capitation	\$	11.33	1.030	1.000	1.030	1.000	12.02	\$ 255,682	\$ 255,682	\$	11.33
Prescription Drug	\$	63.98	1.089	1.004	1.087	1.013	77.03	\$ 1,060,099	\$ 1,443,894	\$	63.98
Total	\$	354.13					412.15			\$	354.13

*Subsidiary KHPC Experience is used for Credibility Manual at 100% Morbidity

Morbidity	0.604
*Other	
Change in Demographics	1.000
Change in Network	1.000
Change in Benefits	1.000
Change in Other	1.000
Projected Index Rate	249.10

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020

Paid to Allowed Ratio Development

Medical Rate Development			
Base Experience Period:	1/1/2018-12/31/2018		
Data as of	3/1/2019		
Rating Period:	1/1/2020 - 12/31/2020		
Trend Months:	24		
Trend:	7.4%		

Drug Rate Development				
Base Experience Period:	1/1/2018-12/31/2018			
Data as of	3/1/2019			
Rating Period:	1/1/2020 - 12/31/2020			
Trend Months:	24			
Trend:	9.3%			

Base Experience Period:	1/1/2018-12/31/2018
Data as of	3/1/2019
Rating Period:	1/1/2020 - 12/31/2020
Trend Months:	24
Trend:	3.0%

Pediatric Vision Rate D	evelopment
Base Experience Period:	1/1/2018-12/31/2018
Data as of	3/1/2019
Rating Period:	1/1/2020 - 12/31/2020
Trend Months:	24
Trend:	3.0%

1	Medical Paid and Incurred Claims	4,270,007
2	Completion Factor	0.99
3	BEP Completed Claims (1) / (2)	4,324,138
4	BEP Member Months	22,568
5	BEP Completed Claim PMPM (3) / (4)	191.60
6	Trend Factor	1.15
7	Trended Claim PMPM (5) x (6)	221.03
8	Benefit/Network Change Factor	0.998
9	Morbidity Adjustment	0.60
10	Capitation	255,682
11	Capitation PMPM	11.33
12	Other Adjustment	1.000
13	Total Benefit Adjusted Claim PMPM [(7) x (8) x (9) x (10) + (11)] x (12)	144.61
		E 1 C1 ' D) (D) ('

BEP Paid and Incurred Claims**	1,298,524
2 Completion Factor	1.00
BEP Completed Claims (1) / (2)	1,298,524
BEP Member Months	22,568
BEP Completed Claim PMPM (3) / (4)	57.54
Trend Factor	1.20
Trended Claim PMPM (5) x (6)	68.78
Benefit/Network Change Factor	0.998
Morbidity Adjustment	0.60
0 Rx Rebates	238,425
1 Rx Rebates PMPM	10.56
2 Other Adjustment	1.000
3 Total Benefit Adjusted Claim PMPM [(7) x (8) x (9)] x (12)	30.91

BEP Paid and Incurred Claims	32,897
Completion Factor	0.99
BEP Completed Claims (1) / (2)	33,380
BEP Member Months	22,568
BEP Completed Claim PMPM (3) / (4)	1.48
Trend Factor	1.06
Trended Claim PMPM (5) x (6)	1.57
Benefit Change Factor	1.00
Morbidity Adjustment	0.60
1	
Other Adjustment	1.000
Total Benefit Adjusted Claim PMPM [(7) x (8) x (9)] x (12)	0.95

	BEP Paid and Incurred Claims	2,870
2	Completion Factor	0.98
3	BEP Completed Claims (1) / (2)	2,930
-	BEP Member Months	22,568
5	BEP Completed Claim PMPM (3) / (4)	0.13
5	Trend Factor	1.06
7	Trended Claim PMPM (5) x (6)	0.14
3	Benefit Change Factor	1.00
)	Morbidity Adjustment	0.60
0		
. 1		
2	Other Adjustment	1.000
3	Total Benefit Adjusted Claim PMPM [(7) x (8) x (9)] x (12)	0.08

	Expected Claim PMPM is
	Rating Period
Medical	144.61
Drug	30.91
Pediatric Dental	0.95
Pediatric Vision	0.08
Expected Distribution of Embedded Dental Benefit	100%
Total Expected Incurred in Rating Period	176.56
Total Expected Incurred in Rating Period Net RA	176.56
Projected Allowed	249.09
Paid to Allowed Ratio	0.709

*Drug BEP Paid and Incurred Claims are net of Rx rebates

Filing 19-42

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Retention

	$\underline{\text{Medical} + \text{Rx}}$	<u>Dental</u>	Vision
Reinsurance Contribution	\$0.00	\$0.00	\$0.00
Risk Adjustment Fee	\$0.18	\$0.00	\$0.00
Admin PMPM	\$43.50	\$0.60	\$0.09
Broker PMPM	\$3.26	\$0.00	\$0.00
Value Based Benefits	\$0.00	\$0.00	\$0.00
BCBSA Identity Theft Protection	\$0.02	\$0.00	\$0.00
Quality Improvement	0.4%	0.4%	0.4%
Contingency	2.0%	2.0%	2.0%
Patient-Centered Outcomes Research Trust Fund:	\$0.00	\$0.00	\$0.00
Insurer Tax	2.7%	2.7%	2.7%
Exchange Fee	\$0.00	\$0.00	\$0.00
Federal Income Tax	0.4%	0.4%	0.4%
Premium Tax	2.0%	0.0%	0.0%

<u>Total</u>	% of Premium
\$0.00	0.0%
\$0.18	0.1%
\$44.19	18.2%
\$3.26	1.35%
\$0.00	0.0%
\$0.02	0.0%
0.4%	0.4%
2.0%	2.0%
\$0.00	0.0%
2.7%	2.7%
\$0.00	0.0%
0.4%	0.4%
2.0%	2.0%

Insurer Tax and Admin Fee Calc

Applied HIF to All Quarters

2.65%

Quarter	% of Enrollees	HIF	_	20	20 assessmen	2020 assessment
1	100%	2.65%		0	2.7%	3.0%
				3	2.7%	3.0%
				6	2.7%	3.0%
				9	2.7%	3.0%
	<u>Admin</u>	<u>Profit</u>	Taxes			
	20.0%	2.0%	5.1%			
Claims	18.2%					
Broker	1.3%					
Quality Improvement	0.4%					

Filing 19-42 18 7/11/2019

Expected Incurred	176.56

	Catastrophic PPC
Plan	8150/0/75
Deductible	8150
Expected Claim Cost	176.56
Expected Premium PMPM *	\$242.31
Allowed Adjustments to Premium for MLR	
Reinsurance Contribution	0.00
Patient-Centered Outcomes Research Trust Fund:	0.00
Risk Adjustment Fee	0.18
Premium Tax	4.85
Insurer Tax	6.43
Exchange Fee	0.00
Quality Improvement	0.97
Federal Income Tax**	1.02
MLR Adjusted Premium	\$228.87
Expected Member Distribution	100.0%

Unadjusted Premium	\$242.31
Expected MLR Adjusted Premium	\$228.87

^{*} From Exhibit L

Filing 19-42 19 7/11/2019

^{**21%} of profit or contingency (assumed to be 2%)

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Projected Index Rate

Projected Index Rate	\$249.09				
Effective Date	Total Index Rate	Trend	Distribution of Members	Projected Allowed	Market Adjusted Index Rate
January - December	\$249.09		100%	\$249.09	
Average for Projection Period	\$249.09			\$249.09	\$249.09

^{*} From URRT and Exhibit B

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Market Adjusted Index Rate

Development of Market Adjusted Index Rate

Q1 Index Rate	249.09
Paid to Allowed	0.71
Q1 Projected Claims	176.56
Net Projected ACA Reinsurace Recoveries	0.00
Net Projected Risk Adjustments PMPM	0.00
Exchange User Fee Adjustment	0.00
Q1 Market-Adjusted Projected Paid EHB Claims PMPM	176.56
Q1 Market Adjusted Index Rate	249.09

Development of Exchange User Fee

Average Exchange Premium	\$0.00
Average Exchange Fee	\$0.00
Percentage of Membership on Exchange	0%
Exchange Fee to Add to Market Index Rate	\$0.00

Development of Risk Adjustment Projection	
Projected 2020 Risk Adjustment Payment	\$0.00
Projected 2018 Risk Adjustment	\$124,618
2018 MemberMonths	2,825
Projected 2018 Risk Adjustment Payment PMPM	\$44.11
Capital Advantage Insurance Company	\$124,618

Adjust Base Experience Period to Base Plan

	<u>Medical</u>	<u>Rx</u>	Ped Dental	Ped Vision	<u>Total</u>	
Expected Claim PMPM in Rating Period	144.61	30.91	0.95	0.08	176.56	
Adjustment to Base Plan	1.000	1.000	1.000	1.000	1.000	
Adjustment for Network	1.000	1.000	1.000	1.000	1.000	
Adjustment for Catastrophic	1.000	1.000	1.000	1.000	1.000	
Adjustment for Induced Demand	1.000	1.000	1.000	1.000	1.000	
Expected Claim Base Plan	144.61	30.91	0.95	0.08	176.56	

Level of Coverage	Data David	OSS - 1	
Med Plan Name:	Rate Development by Benefit Option	Off Exchange	
Med Plan Name: 8150/07/5		-	
Need Plan Name: Rx: Combined Plan Type: PPO HRA N N Q1 Market Adjusted Index Rate 249.09	HIOS	82795PA0140001	
Need Plan Name: Rx: Combined Plan Type: PPO HRA N N Q1 Market Adjusted Index Rate 249.09			
Need Plan Name: Rx: Combined Plan Type: PPO HRA N N Q1 Market Adjusted Index Rate 249.09		Catastrophic PPO	
Rx: Combined Plan Type: PPO HRA N Q1 Market Adjusted Index Rate 249.09	Med Plan Name:	<u>=</u>	
Plan Type: HRA N N			
HRA			
Q1 Market Adjusted Index Rate 249.09	· · · · · · · · · · · · · · · · · · ·		
AV and Cost-Sharing Adjustment			
AV and Cost-Sharing Adjustment Step 1 AV and Cost-Sharing Adjustment Step 2 AV and Cost-Sharing Adjustment Step 2 1.35 Network 1.000 Catastrophic Adjustment 1.000 Induced Demand 1.000 Plan Pricing Relativities: Manual PMPM Pricing Relativity 1.000 Projected Claims 176.56 Total Projected Claims PMPM + Market Level Adjustments: Retention Admin PMPM S44.19 Broker PMPM S3.26 Risk Adjustment User Fee S0.18 HRA Admin Fee Value-Based Benefits S0.00 BCBSA Identity Theft Premium Tax 2.0% Federal Income Tax Insurer Tax 2.7% Contingency Quality Improvement 0.4% Premium Neutrality Total Premium Single Rate: \$239.48 Plan Adjusted Index Rates Plan Adjusted Index Rates S242.31 Expected Member Distribution 1.00 Relativity Checks Claims 1.00 Premium 1.00 \$47.47 Admin 20% Taxes 5.1%	Q1 Market Adjusted fildex Rate	247.07	
AV and Cost-Sharing Adjustment Step 2 Network 1.000 Catastrophic Adjustment 1.000 Induced Demand 1.000 Plan Pricing Relativities: Manual PMPM Pricing Relativity 1.000 Projected Claims 176.56 Total Projected Claims PMPM + Market Level Adjustments: Retention Admin PMPM Broker PMPM Broker PMPM Broker PMPM Brased Benefits Walue-Based Benefits S0.00 BCBSA Identity Theft S0.02 Premium Tax Premium Tax Prederal Income Tax O.4% Insurer Tax Contingency Quality Improvement Premium Neutrality Total Premium Single Rate: \$239.48 Plan Adjusted Index Rates Plan Adjusted Index Rates Expected Member Distribution Relativity Checks Claims Premium 1.00 \$447.47 Admin 20% Taxes 5.1%	AV and Cost-Sharing Adjustment	0.71	
Network	AV and Cost-Sharing Adjustment Step 1	0.52	
Catastrophic Adjustment 1.000 Induced Demand 1.000 Plan Pricing Relativities: Manual PMPM 242.75 Pricing Relativity 1.000 Projected Claims 176.56 Total Projected Claims PMPM + Market Level Adjustments: 176.56 Retention	AV and Cost-Sharing Adjustment Step 2	1.35	
Induced Demand 1.000	Network	1.000	
Induced Demand 1.000	Catastrophic Adjustment	1.000	
Manual PMPM Pricing Relativity 1.000		1.000	
Manual PMPM Pricing Relativity 1.000			
Pricing Relativity			
Projected Claims			
Name			
Retention Admin PMPM \$44.19 Broker PMPM \$3.26 Risk Adjustment User Fee \$0.18 HRA Admin Fee \$0.00 Value-Based Benefits \$0.00 BCBSA Identity Theft \$0.02 Premium Tax 2.0% Federal Income Tax 0.4% Insurer Tax 2.7% Contingency 2.0% Quality Improvement 0.4% Premium Neutrality 1.01 Total Premium Single Rate: \$239.48 Plan Adjusted Index Rates \$242.31 Expected Member Distribution 100.0% Relativity Checks Claims 1.00 Premium 1.00 Premium 1.00			
Admin PMPM \$44.19 Broker PMPM \$3.26 Risk Adjustment User Fee \$0.18 HRA Admin Fee \$0.00 Value-Based Benefits \$0.00 BCBSA Identity Theft \$0.02 Premium Tax \$2.0% Federal Income Tax \$0.4% Insurer Tax \$2.7% Contingency \$2.0% Quality Improvement \$0.4% Premium Neutrality \$1.01 Total Premium Single Rate: \$239.48 Plan Adjusted Index Rates \$242.31 Expected Member Distribution \$100.0% Relativity Checks Claims \$1.00 Premium \$1.00 \$47.47 Admin \$20% Taxes \$5.1%	Total Projected Claims PMPM + Market Level Adjustments:	176.56	
Admin PMPM \$44.19 Broker PMPM \$3.26 Risk Adjustment User Fee \$0.18 HRA Admin Fee \$0.00 Value-Based Benefits \$0.00 BCBSA Identity Theft \$0.02 Premium Tax \$2.0% Federal Income Tax \$0.4% Insurer Tax \$2.7% Contingency \$2.0% Quality Improvement \$0.4% Premium Neutrality \$1.01 Total Premium Single Rate: \$239.48 Plan Adjusted Index Rates \$242.31 Expected Member Distribution \$100.0% Relativity Checks Claims \$1.00 Premium \$1.00 \$47.47 Admin \$20% Taxes \$5.1%	Retention		
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HRA Admin Fee			
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BCBSA Identity Theft			
Premium Tax		'	
Federal Income Tax			
Insurer Tax			
Contingency 2.0% Quality Improvement 0.4% Premium Neutrality 1.01 Total Premium Single Rate: \$239.48 Plan Adjusted Index Rates \$242.31 Expected Member Distribution 100.0% Relativity Checks			
Quality Improvement 0.4% Premium Neutrality 1.01 Total Premium Single Rate: \$239.48 Plan Adjusted Index Rates \$242.31 Expected Member Distribution 100.0% Relativity Checks 1.00 Premium 1.00 Premium 20% Taxes 5.1%			
Premium Neutrality 1.01 Total Premium Single Rate: \$239.48 Plan Adjusted Index Rates \$242.31 Expected Member Distribution 100.0% Relativity Checks Claims 1.00 Premium 1.00 \$47.47 Admin Admin 20% Taxes 5.1%			
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Plan Adjusted Index Rates \$242.31 Expected Member Distribution 100.0% Relativity Checks Claims 1.00 Premium 1.00 \$47.47 Admin Admin 20% Taxes 5.1%	Premium Neutrality	1.01	
Relativity Checks 1.00 Claims 1.00 Premium 1.00 \$47.47 Admin 20% Taxes 5.1%	Total Premium Single Rate:	\$239.48	
Relativity Checks Claims 1.00 Premium 1.00 \$47.47 Admin Admin 20% Taxes 5.1%	~	\$242.31	
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Admin 20% Taxes 5.1%			
Taxes 5.1%			
		5.1%	

Filing 19-42 23

ExhibitL_RateDev

Exhibit M_PlanAdjInd

Benefit Plans

Annual Trend

Less Series Seri

Capital Advantage Insurance Company Individual Rates **Effective 1/1/2020** Calibration

Expected Average Age Factor:	0.982
List-Billed Adjustment for Max 3 Children	1.003
Adjusted Average Age Factor	0.979
Expected Average Region Factor:	1.03
Expected Average Tobacco Factor	1.005
Cumulative Rating Factors (Premium Neutrality)	1 01

Distribution of Population Age Exactor Region Distribution of Population Finctor PRO MIMO PRO 1001		Age Factors			Region Factors		T	obacco F	actors
15	<u>Age</u>	Distribution of Poplulation	Age Factor	<u>Region</u>	Distribution of Population	<u>Factor</u>	<u>PPO</u>	<u>HMO</u>	Final Fa
16	0-14	13.46%	0.765	6	38%	1.0000	1.005	1.002	1.00
177	15	3.85%	0.833	7	38%	1.0700			
18	16	0.00%	0.859	9	25%	1.0100			
19	17	3.85%	0.885						
20 1.92% 0.970 21 3.85% 1.000 22 3.85% 1.000 23 5.77% 1.000 24 1.92% 1.004 25 13.46% 1.024 27 7.69% 1.048 28 7.69% 1.087 29 11.54% 1.119 30 0.00% 1.159 32 0.00% 1.159 33 0.00% 1.198 34 0.00% 1.283 36 0.00% 1.235 37 0.00% 1.238 38 0.00% 1.238 38 0.00% 1.246 39 0.00% 1.302 42 0.00% 1.325 43 0.00% 1.397 45 0.00% 1.397 45 0.00% 1.563 49 0.00% 1.563 49 0.00% 1.766	18	0.00%	0.913						
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Filing 19-42

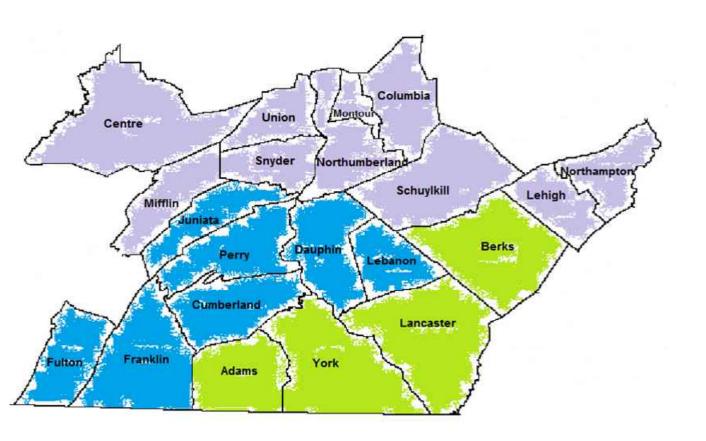
<u>HMO</u> <u>Final Factor</u> 1.002 1.005

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Rating Factors

Age Factors

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

Region



Region	<u>Factor</u>
6	1
7	1.07
9	1.01

<u>Network</u>	<u>Factor</u>
PPO	1.00

Exhibit P_QtlyRate

Capital Advantage Insurance Company Individual Rates Effective 1/1/2020 Regional Analysis

Annual Increase -3.8%

Results

			Projected LR w No					
	Current Month		Region Factor		Adjusted for			Final Rel to Region
By Region	<u>Members</u>	Enrollment Dist	<u>Change</u>	Target LR	Regional Costs	Current Factors	Adj Factors	<u>6*</u>
6	19,532	42%	81.1%	81.9%	-4.8%	1	0.99	1.0000
7	21,060	45%	90.8%	88.1%	-0.9%	1.03	1.06	1.0700
9	6,462	14%	81.4%	87.6%	-10.6%	1.08	1.00	1.0100
Total	47,054	100%	85.5%	85.5%	-3.9%	1.02	1.02	1.03

Data - Claims and Enrollment for 12 Months Ending December 2018407,399 47.054 401.355.182 265.931.459

	Total	1	407,399	47,054	401,355,182	265,931,459	(10,060,406)	29,528,708	61.3%
Region	Group County Name	% 2018 Enrollment	<u>MemberMonths</u>	Current Month Members	<u>Premium</u>	Incurred Claims	Rx Rebates	RA Estimate	Loss Ratio
	6 Lehigh	13.6%	55,575	7,052	\$51,213,578	\$32,706,781	-\$1,702,559	\$3,010,701	57.2%
	6 Northampton	13.8%	56,141	7,014	\$52,215,997	\$32,045,773	-\$1,508,015	\$3,538,122	54.8%
	6 Schuylkill	3.1%	12,727	1,902	\$13,503,821	\$6,931,822	-\$499,159	\$715,931	45.2%
	6 Centre	0.5%	1,982	786	\$1,793,296	\$2,362,599	-\$253,702	\$2,127,833	53.8%
	6 Northumberland	1.1%	4,285	798	\$4,299,782	\$3,559,764	-\$273,143	\$292,617	71.6%
	6 Columbia	0.7%	2,761	577	\$2,749,971	\$2,580,302	-\$137,005	\$990,964	65.3%
	6 Union	0.7%	2,726	482	\$2,601,251	\$2,189,845	-\$113,940	-\$207,012	86.7%
	6 Mifflin	0.4%	1,671	346	\$1,708,413	\$1,814,821	-\$105,319	\$826,927	67.4%
	6 Snyder	0.7%	2,703	489	\$2,530,839	\$1,685,333	-\$153,811	\$565,778	49.5%
	6 Montour	0.0%	88	86	\$108,824	\$103,171	-\$32,860	\$86,584	36.0%
	7 Lancaster	11.5%	46,816	6,664	\$41,811,104	\$32,153,690	-\$1,623,180	\$5,969,631	63.9%
	7 Berks	9.8%	39,780	4,404	\$38,487,421	\$27,476,337	-\$831,916	\$4,367,296	62.2%
	7 York	20.8%	84,909	8,048	\$90,426,241	\$58,522,445	-\$1,500,115	\$1,492,830	62.0%
	7 Adams	5.1%	20,964	1,944	\$23,063,809	\$16,306,585	-\$380,689	\$1,547,243	64.7%
	9 Dauphin	4.7%	19,223	1,548	\$17,791,311	\$12,134,360	-\$209,816	\$2,477,934	58.8%
	9 Cumberland	6.0%	24,328	1,939	\$22,526,167	\$14,459,915	-\$174,177	\$2,279,943	57.6%
	9 Lebanon	0.1%	506	399	\$475,982	\$430,647	-\$117,883	\$163,927	48.9%
	9 Franklin	5.5%	22,235	1,902	\$25,630,532	\$13,861,428	-\$278,964	-\$955,079	55.0%
	9 Perry	0.9%	3,866	334	\$3,873,757	\$2,626,809	-\$64,579	\$514,471	58.4%
	9 Fulton	0.7%	2,986	233	\$3,398,997	\$1,528,011	-\$65,911	-\$172,891	45.3%
	9 Juniata	0.3%	1,128	107	\$1,144,089	\$451,021	-\$33,666	-\$105,042	40.2%
	6	34.5%	140,657	19,532	\$132,725,772	\$85,980,211	-\$4,779,510	\$11,948,445	56.1%
	7	47.2%	192,470	21,060	\$193,788,574	\$134,459,056	-\$4,335,900	\$13,377,000	62.8%
	9	18.2%	74,272	6,462	\$74,840,835	\$45,492,192	-\$944,996	\$4,203,264	56.4%



June 25, 2019

, Director

Bureau of Life, Accident and Health Insurance
Office of Insurance Product Regulation and Administration
Commonwealth of Pennsylvania Insurance Department
1311 Strawberry Square
Harrisburg, PA 17120

Re: Capital Advantage Insurance Company

Individual Rates Filing No 19-42

TOI Code: H15I Individual Health – Hospital/Surgical/Medical Expense

Sub-TOI Code: H15I.001 - Hospital/Surgical/Medical Expense

Filing Type: Rate

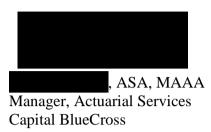
Dear :

CAIC received an objection letter from the Department dated June 18, 2019. CAIC is providing the following in response to the objection letter:

- Q&A written response
- O&A exhibits
- Health Insurer Fee calculation workbook and memo
- Historical financial statements
- Risk adjustment calculation workbook
- Revised List-Billed adjustment workbook
- Revised Rate Development workbook
- Revised PAAM Exhibits to reflect the change in RA User Fee application and other requested changes
- Revised URRT
- Revised Rates (PA and Federal Templates)
- Revised Memos Actuarial, Cover Letter, and Rate Change Summary

All changes are due to PID requests/questions and have been disclosed in the Q&A written response. The change to RA User fee application does slightly impact rates (\$0.01 - \$0.02).

Sincerely,



Enclosures

cc: , FSA, MAAA, Senior Director, Actuarial Services , ASA, MAAA, Vice President and Chief Actuary, Actuarial Services , Corporate Counsel

CAPITAL ADVANTAGE INSURANCE COMPANY, INC.

Question and Answer Individual Rates Effective January 1, 2020

With this response, please find corresponding Q&A Exhibits in Ind_19-42_Initial_CAIC_PPO_Q&AExhibits1_Supporting_20190625.xlsx

Question 1. Page 3 of your actuarial memorandum says, "Transitional membership is included in PA Rate Exhibits Table 2 and is broken out in Exhibit G1". Please explain the adjustment made for the transitional plans in the base period data when projecting the 2020 rates for non-transitional plans including quantitative support and where the adjustment is made.

Answer 1. Transitional business is not included in base experience period. The Actuarial memo has been corrected to reflect this.

Question 2. Please list and provide the measurement used for each category included in "Other Medical" and the number of units and cost for each.

Answer 2. Please see Q&A Exhibit 1 for the data requested.

Question 3. Please explain where the changes in benefit cost sharing between 2018 and 2020 shown in Exhibit B were reflected.

Answer 3. The changes in benefit cost sharing are reflected in Exhibit D, Benefit Mix. This exhibit measures the benefit change from the Base Experience Period (BEP) to the rating period. The manual cost measurement in both the BEP and rating period reflect the benefits accordingly. Actuarial Memo, pages 6 and 8 further describe adjustments for benefits.

Question 4. Please explain how adjustments were made for large claims in the base period that may not be repeated or that may be increase in 2020.

Answer 4. No explicit adjustment is made for large claims. In a large population, these claims are assumed to reflect future claim costs.

Question 5. Please confirm that there was no private reinsurance for this business or explain how and where it was reflected.

Answer 5. I confirm that there is no private reinsurance for this business.

Question 6. For the manual rate development please:

- 1. Explain how the experience was adjusted to remove the KHPC bronze experience;
- 2. Explain how the impact of benefit changes from 2018 to 2020 was accounted for;

- 3. Explain how differences in provider fees between CAIC and KHPC were accounted for;
- 4. Explain how differences in the proportion of membership in each region between KHPC and CAIC was accounted for.
- 5. Confirm that the morbidity of the two populations was the same except for average age;
- 6. Provide support for the age factors in Exhibit F_URRT.

Answer 6.

- 1. Bronze experience was adjusted to the catastrophic levels by measuring the distribution of Bronze/Cat in the experience period (75%/25%) and comparing that to the rating period (0%/100%). Using factor of 0.5 for catastrophic plans, and 1.0 for non-Cat, the adjustment is $(0.5 \times 100\% + 1 \times 0\%) / (0.5 \times 25\% + 1 \times 75\%) = .57$.
- 2. Benefit changes are calculated in Exhibit D, Benefit Mix and discussed in the actuarial memorandum page 6. The average benefit is the experience period 247.26 (from CBC's actuarial cost model). The average benefit in the rating period (Cat plan) is 242.75. The benefit change is 242.75 / 247.26 = 0.98.
- 3. KHPC pays capitation on primary care physician visits and mental health. In total, HMO plans are estimated to be approximately 2% less costly (medical cost only) than PPO due to the combination of capitation, physician referrals, and absence of out-of-network coverage. The resulting relativity between KHP and CAIC catastrophic plans reflects this network difference.
- 4. The differences in membership distribution among regions is not explicitly taken into account. This is because CBC members can choose to buy either a KHP or CAIC catastrophic plan, making the purchasing population equal. In order to align rates across subsidiaries according to network and benefits, the same region calibration is done for both companies.
- 5. The purchasing population that buys either an off-exchange KHP Catastrophic plan or an off-exchange CAIC catastrophic plan is the same. CAIC only has 52 current members, making its population not credible.
- 6. The factors used to adjust KHP Bronze/Cat experience to CAIC Cat experience are estimates of the impact of the Catastrophic population compared to that in Bronze plans. The factor of 0.5 is close to the KHP catastrophic adjustment of 0.55.

Please note that the combination of 0.5 factor to adjust KHP experience and \$0 risk adjustment estimate work together to produce final rates that align with KHP Cat rates, with differences explainable by network.

Question 7. Please provide the leveraging impact used in the trend (see page 5 of the actuarial memorandum) and provide support for the leveraging as demonstrated by the paid and allowed claim trends.

Answer 7. Last year's CAIC Individual filing showed the calculation to justify 1.6% for leveraging. This year's filing is requesting 1% leveraging adjustment. I am including last year's exhibit in Q&A Exhibit 2 with the following explanation:

In order to determine the future impact of leveraging, including the impact of increasing cost sharing due to allowed costs rising, I'm showing a claim probability distribution with allowed

amounts by range. The data is for 2017 CBC ACA single risk pool population. I applied an average AV of 70% to the population (note that KHPC average AV is around 62%, making leveraging higher). From that, I can infer that a deductible (applying to all services) of \$5,519 is equal to 70% AV for this population. Using that deductible amount, I can measure incurred claims and member cost-sharing trend, given an allowed trend of 6.5%. Claims are trended in a database in order to move claims into the correct buckets as they trend. You can see that the total allowed amounts are increasing at 6.5% annually (columns O and X). Given the deductible and allowed trend, incurred claims trend at 8.1%, member cost-share at 2.8% and leveraging is 8.1%-6.5%=1.6%.

Question 8. Please explain how you converted the KHP capitations to the CAIC plans that do not have capitations.

Answer 8. While KHP capitations are not explicitly adjusted, the resulting relativity between KHP and CAIC catastrophic rates reflects the network differences. See Answer 6 (3) above.

Question 9. Page 3 of the federal memorandum indicates CAIC does not include capitated services, however, the PAAM indicates a weight of 3.20% for capitation. Please explain why any weight is applied to capitation.

Answer 9. CAIC is using KHP base experience period data, including capitation, for rating purposes. This same approach is used for trend.

Question 10. Please provide quantitative support for the Pricing AV of 0.525 and explain why it is so much different than the projected paid-to-allowed of 71%.

Answer 10. As further explained in answer 14 below, my approach to pricing AV and induced demand results in (pricing AV) x (induced demand) = approximate paid-to-allowed ratio. This is because pricing AV is determined from CBC's internal actuarial cost model. The model is described in the Actuarial Memo, page 8, bullet 6a. The model calculates both an average allowed and paid manual cost PMPM. Paid Manual Cost PMPM / Allowed Manual Cost PMPM = Pricing AV. Induced demand is then calculated as described in answer 19 below in order to establish a true projected cost for each plan. For this reason, the product of pricing AV and induced demand must be compared to paid-to-allowed ratio.

Question 11. Please explain why the PA estimate of 2018 risk adjustment was not used.

Answer 11. For the filed 2018 estimate, PA estimated risk adjustment was released too close to the submission of the filing. Data by HIOS and inputted in other exhibits was already completed at the time. CBC does intend to update the 2018 base experience period once final RA results are released at the end of June.

For the 2020 estimate, Please see "Ind_19-43_Initial_CAIC_PPO_RACalc_Supporting_CONF_20190625.xlsx" for the CBC's best estimate to date of Individual 2019 risk adjustment transfer payment PMPM. While 2018 actual

transfer payment is useful in calculating future years, our best estimate of 2019 given our current population is most indicative of 2020 payments. The following are key points:

- Because CAIC Catastrophic plan is new for 2019, CAIC PLRS and all of applicable rating factors are set equal to KHPC 2019 estimated Catastrophic results. The following bullets describe the methodology used to predict KHPC Catastrophic transfer. Please note that although a payable is calculated, \$0 is used in CAIC rating to properly align rates across subsidiaries and benefits.
- CBC collects and tracks member risk score information using the HHS risk model. This is referred to as Care Modeler data in the documentation.
- The data for this analysis is CAIC Individual member risk for members effective 1/1/2019 4/30/2019.
- CBC recognizes that risk through 4 months of the year requires maturity factors to estimate a 12-month risk score. A maturity factor is applied to the 4-month risk scores, which is calculated from 2018 actual risk score factor growth.
- Market risk scores and other factors are assumed flat from 2018.

Question 12. Please explain how you plan to determine the projected 2020 risk adjustment transfer amount once HHS releases them for 2018.

Answer 12. I plan to take the same approach as above, starting with 2018 actual and making the above adjustments for current enrollment.

Question 13. Please provide the calculation of the \$0.00 risk adjustment showing the federal transfer formula including the relative risk of the block compared to the market.

Answer 13. Please see answer 11 above and supporting exhibits.

Question 14. Please provide support for the benefit richness factor of 2.663.

Answer 14. Due to changes in Network factor = 1.0 and Catastrophic factor = 1.0 (please see answers 15 and 16 below), benefit richness is now 1.35 and is calculated as follows:

- 1. Calculate projected claim cost + market level adjustments by plan. For example, the projected claim cost PMPM for plan 82795PA0140001 is \$179.87.
 - a. Total Projected Claim Cost is \$179.87 at an average projected medical and Rx benefit level (value for relativity purposes only) of 242.75. See Exhibit D_BenMix.
 - b. Plan 82795PA0140001 medical and Rx benefit level is 242.75. Benefit relativity to average projection period is 1.0 (because 82795PA0140001 is the only plan offered in the rating period). See Exhibit L_RateDev cell F10.
 - c. Plan 82795PA0140001 projected claim cost PMPM is \$179.87/1.0 = \$179.87
 - d. Plan 82795PA0140001 projected claim cost PMPM + market level adjustments = 179.97 RA PMPM + Exchange Fee PMPM = 179.87 (-0) + 0 = 179.87
- 2. Calculate Induced Demand by plan
 - a. Induced Demand is the factor needed after MAIR x allowable rating factors is order to establish (1) above.

- b. Plan 82795PA0140001 MAIR x Pricing AV x Network = 253.68 x .52 x 1.0 = 133.17
- c. Induced Demand = 179.87/133.17 = 1.35
- 3. The final projected claim cost by plan is not inflated for induced demand, rather reflects the plan-level claim cost in relation to the total projection period claim cost.

Question 15. Please justify benefit richness factor when there is only one plan and would have to be normalized to 1.000.

Answer 15. Please see answer 14 above. Benefit richness is a result of my standard approach to pricing AV and is not used to inflate projected claims. Projected claims for the Catastrophic plan equals projected claims in Exhibit G, Paid-to-Allowed Ratio Development.

Question 16. Please provide support for the provider network factor of 1.016 since there is only one plan.

Answer 16. With this submission, the network factor has been removed. This does not impact the final answer as the impact was already normalized to 1.0.

Question 17. Please provide support for the catastrophic adjustment of 0.5 since there is only one plan included in the filing and it was based on a manual rate.

Answer 17. With this submission, the network factor has been removed. This does not impact the final answer as the impact was already normalized to 1.0

Question 18. Please provide the development of the health insurer fee of 2.65%.

Answer 18. Please see "Ind 19-

42_Initial_CAIC_PPO_HIFCalc_Supporting_CONF_20190625.xlsx" for the requested data. Tab 1 contains actual amounts for 2018 and 2016.

Also, please see "Ind_19-

42_Initial_CAIC_PPO_HIFCalcMemo_CONF_Supporting_20190625.pdf for a detailed explanation of the HIF calculation provided by CBC's Accounting Department.

Question 19. Please provide support for the geographic factors and prove that they do not reflect morbidity. It appears that target loss ratios were used compared to actual loss ratios that could reflect morbidity.

Answer 19. Exhibit Q Regional Analysis provides actual loss ratio by region adjusted for risk adjustment (RA). The RA adjustment ensures that morbidity is not reflected in the geographic factors.

Question 20. Please explain the changes in the regional factors in Exhibit N from the prior filing.

Answer 20. Regional rating factor changes are driven by cost variance in region 7 from what was projected in prior filings. As seen in Exhibit Q, region 7 costs (adjusted for risk adjustment) are higher than target and higher relative to other regions (also adjusted for risk).

Question 21. The rates for an age 21 non-smoker on the rate template are a lot higher (\$367.49 for area 6) than the rates in the URRT (\$243.20 WS2 F62) or the PA template (\$243.19 Table 10 aa18). Please explain.

Answer 21. With this submission, age 21 region 6 rates match Table 10 and are consistent with URRT, WS2.

Question 22. The PCORI fee should not be used in the 2020 MLR calculation. Please revise the MLR calculation.

Answer 22. Exhibit I, Projected Loss Ratio has been corrected to remove PCORI fee.

Question 23. Please explain the large drop in membership that you are projecting.

Answer 23. Effective 1/1/2019, CAIC offers an off-exchange Catastrophic plan only. Projected membership reflects current membership as of 2/15/2019.

Question 24. Please explain how your Accrued medical incentive pool and bonus amounts and policy reserves from your financial statement were taken into account in your rate development.

Answer 24. Accrued medical incentive pool and bonus amounts are not explicitly considered in the rate development. But quality incentive amounts are added to retention, which would include these amounts. CBC does not accrue for policy reserves in this market segment.

Question 25. Please provide a statement in your actuarial certification that certifies that the geographic area rating factors reflect only differences in the costs of delivery and not differences due to population morbidity.

Answer 25. The actuarial certification has been updated to include the requested statement.

Question 26. The updated URR instructions require the quantitative impact of rate increase drivers. Please provide the estimated impact of the drivers discussed in the Part III Memorandum.

Answer 26. The actuarial memo, page 2, has been updated to include the primary cost drivers and their approximate impact.

The following additional questions or comments are from PID.

Question 27. URRT versus PAAM Exhibit Tables – Please explain and correct the following discrepancies:

- a. The cost sharing is \$496,744 in Tables 2 and 4 of PAAM but \$460,868 on WKST 2, Section II of URRT (cell D28)
- b. Incurred claims are 1,924,633 in Table 2 of PAAM and WKST 1 of URRT but \$1,960,509 in WKST 2, Section II (cell D30)

Answer 27.

- **a.** WKST 2, Section II of URRT has been corrected and now matches Tables 2 and 4 of PAAM.
- **b.** WKST 2, Section II of URRT has been corrected and now matches Table 2 (net rebates) of PAAM and WKST 1 of URRT.

Question 28. Trend - Please provide the worksheet with all the data used in the development of the trends. Please include all the adjustment factors used such as average age factor, product adjustment factor, average geographic factor, average tobacco factor, average benefit factor and please provide the normalized average PMPM.

Answer 28. Please see Actuarial Memo page 4 for a full description of the process used to determine trend. Future cost is used to determine pricing trend, using CBC's hospital, physician and prescription drug contracting models, as well as utilization projections monitored by CBC's medical director.

While historical data is not used to determine trend, please see Q&A Exhibit 3 for CBC's official trend report as of 201905 by market segment. Individual allowed trend is running at 7.8%, compared to filed trend of 8.7%. The difference between 7.8% actual and 8.7% can be justified by leveraging impact. Last year's CAIC Individual filing, CABC-131454888, justified leveraging of 1.6%, which would put actual + leveraging = 9.4%. You can also see a year prior the trend was 20.6%.

Question 29. Paid-to-Allowed Ratio - Please explain why you believe that the method you have used in the calculation of the Paid-to-Allowed Ratio is more reasonable than the PID recommended calculation as per the formula in cell C28 of Table 5 of PAAM. The formula is auto-calculated from entries made for Plan Pricing AVs, Non-Funding CSR adjustment and Total Covered Mapped Lives as of 2/1/2019. The issuer may over-write the formula and use projected enrollment, if appropriate.

Answer 29. Please see the answer to 10 above. Because of my approach to pricing AV and induced demand, the paid-to-allowed ratio is better reflected by the product of the two variables. The calculated paid-to-allowed ratio is projected incurred claims / projected allowed claims as seen on Exhibit G, Paid-to-Allowed.

Question 30. HIF calculations in Exhibit H_Ret – Please document the calculations of the factors of 2.652% (2020) and 2.966% (2021) and include all the data and assumptions used such as market share.

a. Please explain why you have used factors of 2.652% (2020) and 2.966% (2021) for CAIC filings but factors of 2.894% (2020) and 3.238% (2021) for the CAAC and KHPC filings.

b. Provide the actual paid HIT fees on a PMPM and percent of premium for calendar years 2018 and 2016.

Answer 30. Please see "Ind_19-

42_Initial_CAIC_PPO_HIFCalc_Supporting_CONF_20190625.xlsx" for the requested data. Tab 1 contains actual amounts for 2018 and 2016.

Also, please see "Ind_19-

43_Initial_KHP_HMO_HIFCalcMemo_CONF_Supporting_20190625.pdf for a detailed explanation of the HIF calculation provided by CBC's Accounting Department.

Question 31. Age Calibration Factor – Please explain the discrepancy between the List-Billed Adjustment for Max 3 Children of 1.003697 in the PAAM support Tab "Exhibit N_Calibration" and 1.00294 in the workbook "Ind_19-42_Initial_CAIC_PPO_List-Billed_Supporting_20190521".

Answer 31. With this submission, the List Billed data has been corrected, and the result matches the factor applied in Exhibit N. See "IND_19-42_Revised_CAIC_PPO_List-Billed_Supporting_20190625.xlsb"

Question 32. Risk Adjustment – Please provide the calculation of the Projected RA PMPM that will be used in Table 5 of PAAM, starting from the CMS RA amount and billable membermonths, after you replace the current place-holder of \$0.00. This issue is in anticipation of any further question that PID may ask after you make the change. Please note that this change will impact the rate change.

Answer 32. Please see Answer 11 above and corresponding exhibits for the calculation of the risk adjustment transfer. While \$19.60 is the calculated transfer payable, \$0 is used in rating for market and rate staging with other CBC subsidiaries purposes.

Question 33. Please provide an exhibit that shows, by HIOS Plan ID, summary benefit and cost sharing changes for 2020 relative to the 2019 design for all plans to be offered in 2020. Include Pricing AV columns for 2019 and 2020. Please show the approved 2019 Pricing AVs for all plans in the 2019 column and the proposed 2020 Pricing AVs in the 2020 column.

Answer 33. Please see updated Exhibit B, Benefit Change Summary, that now includes the change in Pricing AVs.

Question 34. Risk Adjustment Data Validation process (RADV) -

- a. Please describe any adjustments or considerations made due to the Risk Adjustment Data Validation process (RADV).
- b. As you know CMS is performing a risk adjustment validation starting with 2017 risk adjustment data. We are considering allowing an estimate of the impact of risk adjustment modifications in rate filings as an adjustment to the projected risk adjustment. Before implementation, we are soliciting feedback from our issuers on the pros and cons of the inclusion of this adjustment. If allowed, all issuers would be required to submit an

estimate. The estimate may be \$0. Please provide any feedback that you would like us to consider.

Answer 34.

- **a.** No adjustment was made for RADV.
- **b.** In 2017, Pennsylvania had a -0.15% Individual Market error rate for Non-Exiting issuers. Small Group and Catastrophic had 0% error rates. While CBCl had a 0% error rate in both market segments, the total error rate is applied to statewide average risk scores. Because of the Individual error rate and CBC's zero error rate, we can expect receivable estimates to decrease and payable estimates to increase. Due to these findings, CBC would likely submit a non-zero estimate for the impact of RADV.

Question 35. Induced Utilization Exhibit – Please provide Exhibit B: Induced Utilization Exhibit as per PA Rate Filing Guidance, Page 15.

- a. Please confirm that the ratio in Column (9) represents the pure induced utilization for each plan.
- b. Please show quantitatively, including an Excel spreadsheet with formulas, the derivation of the AV and cost sharing factors for each plan. Please note that it is assumed that the AV and cost sharing factor includes the average tobacco factor.
- c. Please provide any additional justification for induced utilization assumptions in the Company's pricing.
- d. Please confirm that each plan's induced utilization factor was normalized by an aggregate factor, and that the resulting sum product (against 2/1/2019 membership or the projected membership distribution) produces
- e. Please quantitatively demonstrate the calculation of the induced calibration factor.
- f. Please quantitatively show and provide a detailed description as to how the induced demand factor shown in Table 7 relates to the induced utilization factors calculated in the "Induced Utilization Exhibit" shown in the Actuarial Memorandum.

Answer 35. Table B was provided with the original submission (file updated with Q&A response). Please see "IND_19-43_Revised_KHP_HMO_RateDev_Supporting_20190625.xlsb"

- a. Column (9) represents the pure induced utilization for each plan.
- b. Provided in Table B.
- c. Please see Answer 14 above.
- d. Please see Answer 14 above. Induced demand is normalized so that projected claims are not overstated.
- e. Provided in Table 8 and Answer 14 above.
- f. With this submission, Table 7 is corrected to show the average induced utilization and ties to Table B.

Question 36. Please provide an exhibit showing the actual experience for calendar years 2014 – 2018 and the projections for 2019 and 2020 for the following categories: Member months, total administrative expenses, total incurred claims, total premium, total actual paid taxes and fees, profit, annual underwriting gain/loss and underwriting gain/loss PMPY. Also show how the financial gains and losses reconciles with the Annual Financial Statements for those periods.

Answer 36. Please see "Ind_19-

42_Initial_CAIC_PPO_FinancialStatements_Supporting_20190625.xlsx" for the requested data. This is taken directly from CBC's Annual Financial Statements.

Question 37. Please show the development of the average commission as shown in Table 6. Additionally, the current and 2020 broker agreements should be included and used to develop the percent shown in Table 6 as well as the associated PMPM cost.

Answer 37. Individual broker commissions amounts are expected to be unchanged between 2019 and 2020. The broker PMPM applied in rating is equal to the actual Individual broker PMPM as of March 2019, as reported in CBC's financial line of business reports. Current broker agreements were provided with the original submission:

- Ind_19-42_Initial_CAIC_PPO_PPMABrokerIndRedacted_Supporting_20190521.pdf
- Ind_19-42_Initial_CAIC_PPO_WBEBrokerIndRedacted_Supporting_20190521.pdf

While 2020 agreements are yet to be finalized, CBC does not expect to make changes.

Question 38. We have repurposed row 54 to capture RA User Fees. Please provide the RA User Fee percentage and PMPM amount in cells C54 and D54, respectively.

Answer 38. The changes have been made to our calculations and PAAM Exhibits are updated with this submission.

Question 39. Please confirm that you have tested to ensure that the rates in Table 11 of the Actuarial Memorandum Exhibits, PA Plan Design Summary and Rate Tables, Federal Rates Template and the binder are identical.

Answer 39. I confirm that I have tested to ensure rates in PAAM Exhibits Table 11, PA Plan Design Summary and Rate Tables, Federal Rates Template and the binder are identical.

Question 40. Please provide an exhibit that quantitatively shows a comparison of the actual to projected claim cost PMPMs for calendar years 2015 - 2018, as applicable.

Answer 40. Please see Q&A Exhibit 4 for the requested data.

Capital Advantage Insurance Company Individual Rates Q&A Exhibit 1 Other Category per Service

URRT - Other Category		<u>Services</u>	Incurred	Allowed	Incurred per Service	Allowed per Service
OP - DME	Outpatient	0	0	0	0	0
Other - DME	Professional	185	11,638	19,372	63	105
Other - Prosthetics	Professional	0	0	0	0	0
OP - Home Health/PDN	Outpatient	0	0	0	0	0
Other - PDN/Home Health	Professional	13	3,931	3,931	302	302
OP - Medical Surgical Supplies	Outpatient	23	8,551	8,933	372	388
Preventive care - Vision Exams	Professional	83	4,197	7,848	51	95
Dental	Professional	0	0	0	0	0
OP - Ambulance	Outpatient	8	5,313	8,354	664	1,044
Other - Ambulance	Professional	34	7,183	8,022	211	236
Other - Glassess/Contacts	Professional	0	0	0	0	0
Other Med		346	40,813	56,460	118	163
Embedded Dental		80	2,838	4,068	35	51
Embedded Vision		23	365	365	16	16

Individual AV

Member Pays 30% CBC Pays 70%

Deductible Equivalent

5,519

Allowed Trend 6.5% Leveraging 1.6% 30% **|2017 ACA Member Data** Trended 2018 Trended 2019 6.5% 2.8% 8.1% 6.5% 1,535,359 593.35 970,224,152 1,535,359 289,897,303 680,326,849 970,224,152 1,033,288,721 1,535,359 672.99 735,215,464 1,033,288,721 911,008,593 100% 631.92 100% 100% 298,073,258 Annual Claim Member <u>Member</u> CBC Paid <u>Member</u> Member Paid Member Paid **Annual Claim Min** <u>MM %</u> **PMPM** <u>PMPM</u> <u>MM %</u> <u>Max</u> Allowed <u>Months</u> Allowed <u>Months</u> <u>PMPM</u> MM % Allowed <u>Months</u> **PMPY PMPY PMPY** Member Paid CBC Paid Total CBC Paid PMPY Member Paid CBC Paid Total 378,661 254,927 250,279 246,060 100 1.49 17% 343,547 1.37 16% 343,547 311,767 1.27 16% 311,767 311,76 343,547 350 4,524,850 172,393 4,366,233 181,072 12% 4,214,593 189,615 23.86 12% 24.11 289 4,366,233 4,366,23 24.45 11% 293 4,214,593 4,214,593 600 6,643,083 137,334 48.37 9% 6,490,935 133,214 9% 585 6,291,119 128,465 48.97 588 48.73 6,490,935 6,490,935 8% 6,291,119 6,291,119 850 7,439,006 103,613 7% 7,349,931 101,609 72.34 868 7,349,93 7,204,565 99,291 72.56 71.80 7% 7,349,931 6% 871 7,204,565 7,204,565 850 1,100 7,744,846 81,681 7,682,571 80,795 1,141 7,713,435 80,803 94.82 5% 95.09 5% 7,682,571 7,682,57 95.46 5% 1,146 7,713,435 7,713,435 1,100 1,350 7,851,886 66,564 117.96 4% 7,900,100 66,740 118.37 4% 1,420 7,900,100 7,900,100 7,863,817 66,185 118.82 4% 1,426 7,863,817 7,863,81 -1,350 1,600 53,805 53,313 7,688,801 7,597,963 3% 1,710 7,666,109 53,977 142.90 4% 142.52 7,597,963 7,597,963 142.03 4% 1,704 7,666,109 7,666,109 1,850 1,600 7,493,436 45,411 165.01 3% 7,654,501 46,162 165.82 3% 1,990 7,654,501 7,654,50 7,718,454 46,333 166.59 1,999 7,718,454 7,718,454 3% 1,850 2,100 7,406,537 7,436,297 39,297 7,517,036 39,725 38,854 190.62 3% 189.23 3% 2,271 7,436,297 7,436,29 189.23 3% 2,271 7,517,036 7,517,030 2,100 2,350 7,221,824 33,879 33,915 7,352,950 34,224 213.17 2% 7,264,675 214.20 2% 2,570 214.85 2,578 7,352,950 7,264,675 7,264,675 2% 7,352,950 2,350 2,600 7,254,059 30,955 7,276,658 30,671 30,417 238.49 2% 7,347,193 237.35 2% 2,848 7,347,193 7,347,193 237.25 2% 2,847 7,276,658 7,276,658 2,600 2,850 6,874,328 26,244 7,115,590 27,102 7,212,627 27,526 261.94 2% 262.55 2% 3,151 7,115,590 7,115,590 262.03 2% 3,144 7,212,627 7,212,627 2,850 3,100 6,695,037 23,266 287.76 2% 6,894,955 24,033 286.90 2% 3,443 7,122,119 24,986 285.04 3,421 7,122,119 7,122,119 6,894,955 6,894,955 2% -3,100 3,350 6,750,227 21,771 310.06 1% 6,708,197 21,504 311.95 1% 3,743 6,708,197 6,708,197 6,879,792 21,870 314.58 3,775 6,879,792 6,879,792 1% 3,350 3,600 6,681,944 20,044 6,709,265 20,100 6,571,557 19,708 333.36 1% 333.79 1% 4,006 6,709,265 6,709,265 333.45 1% 4,001 6,571,557 6,571,557 3,850 6,501,209 18,973 3,600 18,120 6,605,982 18,448 4,297 6,770,945 358.79 1% 358.09 1% 6,605,982 356.87 4,282 6,770,945 6,770,945 6,605,982 1% 3,850 4,100 6,000,696 15,789 380.06 1% 6,504,231 16,974 383.19 1% 4,598 6,504,231 6,504,23 6,635,807 17,348 382.51 1% 4,590 6,635,807 6,635,80 -4,100 4,350 14,970 4,857 5,768,198 14,184 1% 6,058,767 1% 6,058,767 6,556,501 16,059 4,899 6,556,501 406.67 404.73 6,058,767 408.28 6,556,501 4,350 4,600 5,686,799 13,406 424.20 1% 5,619,540 13,021 431.58 1% 5,179 5,619,540 5,619,540 6,066,061 14,179 427.82 5,134 6,066,061 6,066,061 1% 4,600 4,850 5,815,910 13,001 447.34 1% 5,720,309 12,851 445.13 1% 5,342 5,720,309 5,720,309 5,644,929 12,455 453.23 1% 5,439 5,644,929 5,644,929 4,850 5,100 5,670,602 12,154 466.56 1% 5,832,519 12,293 474.46 5,519 174 5,761,753 12,206 472.04 5,519 5,761,753 1% 5,654,224 178,295 5,832,519 1% 145 5,614,208 147,545 5,100 5,350 5,272,021 10,608 5,598,735 11,367 11,425 496.99 1% 1% 5,519 5,228,306 370,429 5,598,735 5,714,846 500.21 5,519 483 5,254,983 459,862 5,714,846 391 5,350 5,600 5,387,193 10,444 10,752 5,722,689 11,165 515.82 1% 5,496,646 511.22 1% 5,519 615 4,945,434 551,212 5,496,646 512.56 1% 5,519 631 5,135,395 587,294 5,722,689 5,600 5,850 5,054,886 9,321 542.31 5,351,305 9,905 540.26 5,519 964 4,555,852 5,351,305 5,649,762 10,515 537.31 5,519 928 813,338 5,649,762 1% 1% 795,452 1% 4,836,425 5,850 6,100 4,801,356 8,589 559.01 1% 5,470,892 9,650 566.93 1% 5,519 1,284 4,438,564 1,032,329 5,299,420 9,356 5,519 1,278 5,299,420 5,470,892 566.42 1% 4,303,337 996,083 6,100 7,100 19,028,471 30,770 18,946,328 30,738 1,877 20,307,447 32,803 618.41 2% 616.38 2% 5,519 14,138,090 4,808,237 18,946,328 619.07 2% 5,519 1,909 15,087,897 5,219,550 20,307,447 17,021,747 18,377,002 18,735,330 7,100 8,100 24,133 705.33 25,835 3,016 18,377,002 26,191 18,735,330 2% 711.32 2% 5,519 11,882,932 6,494,070 715.33 5,519 3,065 12,046,676 6,688,654 2% 8,100 9,100 14,961,337 18,670 801.36 1% 15,873,961 19,782 802.44 1% 5,519 4,110 9,098,826 6,775,135 15,873,96 17,259,790 21,606 798.84 5,519 4,067 9,937,783 7,322,007 17,259,790 1% 9,100 10,100 15,089,672 16,894 17,024 15,192,010 5,519 5,189 7,830,270 15,112,911 16,898 5,213 7,772,316 15,112,91 893.20 892.39 1% 7,361,739 15,192,010 894.36 1% 5,519 7,340,595 10,100 11,100 13,377,512 13,459 993.95 13,685,822 13,817 990.51 1% 5,519 6,367 6,355,195 7,330,627 13,685,822 15,105,277 15,316 986.24 15,105,277 1% 1% 5,519 6,315 7,044,668 8,060,610 11,100 12,100 13,978,168 12,937 1080.48 1% 14,132,719 13,082 1080.32 1% 5,519 7,444 6,017,129 8,115,590 14,132,719 13,518,131 12,347 1094.85 5,519 7,619 5,679,062 7,839,069 13,518,13 1% 12,100 13,100 14,338,918 12,168 1% 13,822,770 11,721 1179.32 5,519 8,632 5,391,130 8,431,639 13,822,770 13,835,757 11,851 5,519 8,490 13,835,757 1178.41 1% 1167.48 1% 5,450,924 8,384,833 13,100 14,100 12,891,850 10,116 1274.40 14,314,045 11,202 1277.81 5,519 9,814 5,152,414 9,161,632 14,314,045 13,599,521 10,664 1275.27 5,519 9,784 8,694,563 13,599,521 1% 4,904,958 15,100 12,953,508 12,913,551 1355.90 10,751 14,676,564 10,727 14,100 9,666 1340.11 1% 9,524 1% 5,519 4,380,609 8,532,941 12,913,55 1368.19 1% 5,519 10,899 4,933,935 9,742,629 14,676,564 15,100 16,100 11,286,670 7,830 1441.46 12,943,537 9,036 1432.44 11,670 12,881,149 8,935 1% 1% 5,519 4,156,151 8,787,386 12,943,537 1441.65 1% 5,519 11,780 4,109,696 8,771,453 12,881,149 17,100 12,285,131 8,081 1520.25 11,185,846 7,290 1534.41 0% 5,519 12,893 3,353,070 7,832,776 12,756,848 8,344 12,827 12,756,848 16,100 1% 1528.86 5,519 3,837,863 8,918,985 11,185,846 1% 18,100 11,392,999 6,906 12,072,766 7,032 17,100 1649.72 0% 7,496 1610.56 0% 5,519 13,807 3,447,821 8,624,944 12,072,766 11,340,456 1612.69 0% 5,519 13,833 3,234,402 8,106,054 11,340,456 19,100 9,927,875 5,765 1722.09 11,473,441 6,581 3,026,962 12,148,878 7,085 18,100 0% 1743.42 0% 5,519 15,402 1714.73 0% 5,519 3,258,780 8,446,479 11,473,441 15,057 8,890,098 12,148,878 19,100 20,100 10,402,369 5,708 1822.42 0% 10,273,825 5,699 1802.74 0% 5,519 16,113 2,621,282 7,652,542 10,273,825 11,885,108 6,491 1831.01 0% 5,519 16,453 2,985,567 8,899,541 11,885,108 21,100 4,544 5,432 20,100 8,941,889 1967.85 0% 10,485,392 1930.30 0% 17,644 10,289,106 5,416 1899.76 5,519 2,498,474 7,986,918 10,485,392 5,519 17,278 2,491,115 7,797,991 10,289,106 21,100 22,100 8,815,645 4,371 9,107,334 4,486 2030.17 5,519 18,843 7,043,977 9,107,334 10,349,395 5,121 2020.97 2016.85 0% 0% 2,063,357 0% 5,519 18,732 2,355,428 7,993,966 10,349,395 22,100 23,100 8,774,833 4,212 2083.29 0% 8,946,902 4,176 2142.46 0% 5,519 20,190 1,920,771 7,026,131 8,946,902 9,868,427 4,678 2109.54 0% 5,519 19,795 2,151,668 7,716,759 9,868,427 24,100 8,392,896 3,692 2273.27 8,467,230 3,829 5,519 21,017 8,877,503 3,955 8,877,503 23,100 0% 2211.34 0% 1,761,167 6,706,063 8,467,230 2244.63 0% 5,519 21,416 1,819,121 7,058,382 24,100 29,100 35,884,002 14,539 2468.12 1% 39,330,082 15,859 2479.99 1% 5,519 24,240 7,294,423 32,035,659 39,330,082 41,394,272 16,608 2492.43 5,519 24,390 7,638,929 33,755,343 41,394,272 1% 32,805,669 11,157 11,421 34,937,722 29,100 34,100 2940.37 1% 33,514,573 2934.47 1% 5,519 29,694 5,253,144 28,261,429 33,514,573 11,938 2926.60 5,519 5,490,940 34,937,722 1% 29,600 29,446,782 39,100 28,420,321 8,440 3367.34 29,642,326 8,776 35,012 32,282,506 9,509 34,100 1% 3377.66 1% 5,519 4,036,563 25,605,762 29,642,326 3394.94 5,519 35,220 4,373,710 27,908,796 32,282,506 44,100 25,231,269 6,654 27,286,633 7,244 27,698,636 7,241 39,100 3791.89 0% 3766.79 0% 39,682 3825.25 5,519 3,331,912 23,954,721 27,286,633 5,519 40,384 3,330,533 24,368,103 27,698,636 44,100 49,100 24,242,237 5,583 4342.15 0% 24,720,684 5,724 4318.78 0% 5,519 46,306 2,632,781 22,087,903 24,720,684 25,870,175 6,081 4254.26 5,519 45,532 2,796,985 23,073,190 25,870,173 3,672 18,006,180 21,894,708 4,525 52,544 24,424,642 5,126 5,519 49,100 54,100 4903.64 0% 4838.61 0% 5,519 2,081,295 19,813,413 21,894,708 4764.85 0% 51,659 2,357,728 22,066,914 24,424,642 54,100 59,100 19,653,713 3,876 5070.62 0% 17,655,046 3,365 5246.67 0% 5,519 57,441 1,547,748 16,107,298 17,655,046 19,325,303 3,583 5393.61 0% 5,519 59,204 17,677,285 19,325,303 1,648,018 3,275 19,652,340 19,100,13 69,100 16,809,549 2,790 6024.93 19,378,603 3,156 6140.24 1,451,617 19,139,631 3,169 6039.64 1,457,597 64,100 0% 0% 5,519 68,163 17,926,986 19,378,603 5,519 66,956 17,682,035 19,139,631 14,173,283 2,930 69,100 74,100 2,145 6607.59 0% 16,433,056 2,536 6479.91 0% 5,519 72,239 1,166,445 15,266,611 16,433,056 19,473,932 6646.39 5,519 74,237 1,347,668 18,126,265 19,473,932 74,100 79,100 12,853,661 1,841 13,865,810 1,958 7081.62 79,460 16,066,560 2,316 6937.20 77,727 6981.89 0% 5,519 900,591 12,965,218 13,865,810 5,519 15,001,304 16,066,560 1,065,255 79,100 99,100 48,335,088 5,860 8248.31 51,270,248 6,230 8229.57 0% 5,519 93,235 2,865,518 51,270,248 52,963,124 6,451 8210.06 52,963,124 48,404,729 5,519 93,001 2,967,168 49,995,956 99,100 119,100 34,192,094 3,451 9907.88 37,150,112 3,706 10024.32 0% 5,519 114,772 1,704,592 35,445,519 37,150,112 42,185,381 4,181 10089.78 5,519 115,558 1,923,071 40,262,310 42,185,381 0% 0% 119,100 139,100 26,615,257 2,201 12092.35 29,470,755 2,480 5,519 32,765,917 2,781 5,519 32,765,917 0% 11883.37 0% 137,081 1,140,688 28,330,067 29,470,755 11782.06 0% 135,865 1,279,134 31,486,783 139,100 159,100 18,557,599 1,343 22,231,037 13722.86 13818.02 1,620 0% 5,519 159,155 745,127 21,485,910 25,121,593 1,816 13833.48 5,519 835,278 25,121,593 22,231,037 0% 160,482 24,286,315 179,100 16,755,090 1,080 17,378,608 1,127 1,230 159,100 15513.97 0% 15420.24 0% 5,519 179,523 518,369 16,860,239 17,378,608 19,198,973 15608.92 0% 5,519 181,788 565,744 18,633,229 19,198,973 179,100 12,796,935 730 17300.21 199,100 17530.05 15,692,614 17553.26 16,279,495 941 0% 894 0% 5,519 205,120 411,200 15,281,414 15,692,614 0% 5,519 202,083 432,817 15,846,678 16,279,495 11,828,468 199,100 219,100 12,726,693 655 19430.07 0% 12,107,201 606 19978.88 0% 5,519 234,227 278,733 12,107,201 14,375,473 742 19373.95 5,519 341,286 14,375,473 0% 226,968 14,034,186 219,100 239,100 576 11,855,964 555 12,836,218 12,119,858 21041.42 21362.10 5,519 250,826 255,275 11,600,689 11,855,964 598 21465.25 5,519 252,064 275,053 12,561,165 12,836,218 239,100 259,100 8,206,499 350 23447.14 12,900,709 587 21977.36 12,630,715 13,255,115 569 23295.46 0% 0% 5,519 258,209 269,993 12,900,709 0% 5,519 274,026 261,714 12,993,401 13,255,115 259,100 279,100 8,507,432 329 25858.46 8,129,916 290 28034.19 0% 5,519 330,891 133,387 7,996,529 9,421,032 395 23850.71 5,519 181,682 9,239,350 9,421,032 0% 8,129,916 0% 280,689 279,100 299,100 6,924,022 237 29215.28 6,842,264 263 9,590,659 327 29329.23 0% 26016.21 0% 5,519 306,675 120,968 0% 150,405 9,590,659 6,721,295 6,842,264 5,519 346,431 9,440,253 237 299,100 319,100 7,425,879 237 31332.82 7,374,084 31114.28 109,009 7,374,084 5,798,256 203 28562.84 0% 0% 5,519 367,852 7,265,075 0% 5,519 337,235 93,371 5,704,885 5,798,256 7,229,889 237 319,100 339,100 8,247,048 249 33120.67 0% 213 33943.14 0% 5,519 401,798 97,970 7,131,918 7,229,889 7,853,399 33136.71 5,519 392,121 109,009 7,744,390 7,853,399 0% 339,100 439,100 17,247,230 485 35561.30 26,003,316 710 803 38442.24 0% 36624.39 0% 5,519 433,973 326,568 25,676,748 26,003,316 30,869,115 0% 5,519 455,787 369,344 30,499,771 30,869,115 439,100 12,507,149 276 12,382,772 12,148,189 294 539,100 45315.76 279 44382.70 5,519 527,073 128,327 12,254,445 41320.37 5,519 490,325 135,227 12,012,962 12,148,189 12,382,772 539,100 105 639,100 5,898,345 120 49152.88 0% 5,746,602 54729.54 0% 5,519 651,235 48,295 5,698,307 5,746,602 11,010,355 198 55607.85 0% 5,519 661,775 91,071 10,919,284 11,010,355 639,100 739,100 4,175,394 57 73252.53 4,681,942 78 4,912,445 5,519 0% 60024.90 0% 5,519 714,779 35,876 4,646,066 4,681,942 84 58481.48 0% 696,258 38,636 4,873,808 4,912,445 739,100 839,100 4,720,331 52 90775.60 5,519,036 55 100346.12 0% 5,519 1,198,634 25,298 5,493,739 4,010,570 45 89123.78 5,519 1,063,966 20,698 3,989,872 4,010,570 0% 5,519,036 0% 839,100 939,100 3,443,825 39 88303.20 0% 5,299,234 63 84114.83 0% 5,519 1,003,859 28,977 5,270,257 5,299,234 4,411,110 40 110277.76 0% 5,519 1,317,814 18,398 4,392,712 4,411,110 939,100 1,039,100 1,977,486 12 4,848,879 95076.07 24 82395.23 940,648 78387.31 5,519 935,128 5,519 935,128 51 5,519 1,135,393 23,458 4,825,422 4,848,879 0% 0% 940,648 0% 1,039,100 1,139,100 4,343,148 29 149763.74 0% 4,328,010 37 116973.23 0% 5,519 17,018 2,242,914 24 93454.73 5,519 2,242,914 1,398,159 4,310,991 4,328,010 0% 1,115,937 11,039 2,231,875 1,139,100 2,403,466 1,239,100 16 150216.60 1,797,080 7,359 2,396,106 2,366,417 13 182032.05 5,519 2,178,865 5,979 2,366,417 0.000% 5,519 2,403,466 2,360,437 16 159980.68 1,239,100 1,339,100 2,559,691 1,914,249 2,552,332 2,559,691 0.000% 0.000% 0% 5,519 7,359 1,339,100 1,439,100 0.000% 0.00 0% 0.000% 1,439,100 0.00 1,539,100 1,479,272 295854.37 0% 0% 0.000% 1,605,053 12 133754.45 1,575,424 1,539,100 1,639,100 5 315084.90 0.005,519 3,775,499 2,300 1,573,125 1,575,424 1,639,100 2,139,100 3,715,524 21 176929.69 3,496,579 21 166503.75 0% 5,519 1,992,526 9,659 3,486,920 3,496,579 5,401,683 26 207757.06 0% 5,519 2,487,565 11,959 5,389,725 5,401,683 2,169,836 2,310,875 2,139,100 2,639,100 0.0012 180819.64 0% 5,519 2,164,316 5,519 2,164,316 2,169,836 2,310,875 12 192572.91 0% 5,519 2,305,356 5,519 2,305,356 2.639.100 9.999.999.999 3.131.144 6 521857.31 0% 3,334,668 6 555778.04 0% 5.519 6.663.817 2,760 3.331.909 3.334.668 3.551.422 6 591903.61 0% 5.519 7.097.324 2,760 3,548,662 3,551,422

Capital Advantage Insurance Company Individual Rates Q&A Exhibit 3 Capital BlueCross Monthly Medical Trend Report

Individual

For 12 Month Periods Ended

	12 Months Ended:		% Ch	ange
5	201805	201705	2019/2018	2018/2017
732.49	\$ 679.67	\$ 563.80	7.8%	20.6%

Small Group Insured

Allowed PMPM

Medical + Pharmacy

201905

For 12 Month Periods Ended

	12 Months Ended:				% Change			
Allowed PMPM		201905	201805	201705	2019/2018	2018/2017		
Medical + Pharmacy	\$	587.13 \$	538.31	\$ 500.07	9.1%	7.6%		

Capital Advantage Insurance Company Individual Rates Q&A Exhibit 4 Claim Cost Projection History

	Pa	id	Risk Adjustment		Exhange User Fees		Market Adjusted Paid	
Year	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual
2015	\$358.32		-\$0.08		\$6.77		\$365.17	
2016	\$349.49	\$41.45	-\$0.21	-\$325.42	\$6.65	\$0.00	\$356.35	\$366.88
2017	\$516.23	\$455.51	\$0.13	-\$312.61	\$0.00	\$0.00	\$516.10	\$768.12
2018	\$660.32	\$681.29	\$28.09	\$45.34	\$0.00	\$0.00	\$632.23	\$635.94



July 12, 2019

, Director

Bureau of Life, Accident and Health Insurance
Office of Insurance Product Regulation and Administration
Commonwealth of Pennsylvania Insurance Department
1311 Strawberry Square
Harrisburg, PA 17120

Re: Capital Advantage Insurance Company

Individual Rates Filing No 19-42

TOI Code: H15I Individual Health - Hospital/Surgical/Medical Expense

Sub-TOI Code: H15I.001 - Hospital/Surgical/Medical Expense

Filing Type: Rate

Dear :

CAIC received an objection letter from the Department dated July 5, 2019. CAIC is providing the following in response to the objection letter:

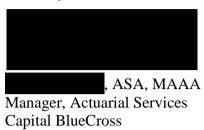
- Q&A written response
- O&A exhibits
- Risk adjustment calculation workbook
- Revised Rate Development workbook
- Revised PAAM Exhibits
- Revised URRT
- Revised rates (PA and Federal Templates)
- Revised memos Actuarial, Cover Letter, and Rate Change Summary

Also, as requested, a public filing is being submitted with the objection response.

All changes are due to PID requests/questions and have been disclosed in the Q&A written response. Requested rates have changed due to finalized 2018 risk adjustment results released on June 28, 2019, and updated CBC 2019 risk data as of May 2019, as well as a change to filed trend.

If	you have any questions regarding	this	filing, please call me at	(or via email at
		or	at	
().	Tha	ank you for your assistance	in this matter.

Sincerely,



Enclosures

cc: , FSA, MAAA, Senior Director, Actuarial Services , ASA, MAAA, Vice President and Chief Actuary, Actuarial Services , Corporate Counsel

CAPITAL ADVANTAGE INSURANCE COMPANY, INC.

Question and Answer Individual Rates Effective January 1, 2020

With this response, please find corresponding Q&A Exhibits in Ind_19-42_Initial_CAIC_PPO_Q&AExhibits2_Supporting_20190712.xlsx

Question 1. Follow-up to question 3: Where are the benefit adjustments reflected on the PAAM and on the URRT?

Answer 1. The benefit adjustment is reflected in the paid-to-allowed ratio. The paid-to-allowed ratio is developed in Exhibit G, Paid-to-Allowed Ratio Development. The calculation includes the benefit change factor (line 8).

Question 2. Follow-up to questions 10, 14, 15, and 29: please provide more information on the model described in the Actuarial Memo, page 8, bullet 6a.

- a. Does this model use actual claims experience?
- b. Is the pricing AV being calculated at the metal level using experience from the metal level (in this case catastrophic experience)?
- c. Please demonstrate that the resulting AV does not reflect morbidity?

Answer 2. CBC uses Milliman, Inc. Health Cost Guidelines Commercial Rating Structures (for active employees) to develop benefit relativities. To help answer questions, I am pulling from Milliman's methodology description. Anything is quotations is directly from Milliman, Inc.

- a. "Milliman utilizes an enrollment and utilization database of full medical and prescription drug claims experience for over 78 million lives, of which approximately 41 million lives were selected and used as the primary source in developing the [model]. Other sources include a database of inpatient admission representing a large percentage of all admissions nationwide, retail pharmacy information, and other reference data sources."
 - I. CBC adjusts nationwide data to CBC's average costs and contracting in our service area.
- b. The pricing AV is not calculated using the experience of that metal level. Instead, CBC uses the actuarial cost model noted above to measure the impact of cost-sharing designs on cost and utilization amounts by service category. The cost model shows frequency per 1,000 per year by type of service (IP, OP, Professional), and allowed cost per service for each of the same types of service, normalized to a \$0 office visit copayment and a \$25 ER copayment. Given a particular benefit design (for example, \$20 office visit copayment), utilization is adjusted from the benchmark based on assumed utilization change factors, and cost per service is reduced by the copayment or coinsurance per service. Cost and utilization are multiplied together to derive a PMPM by service, summed for all services. The impact of global deductible, coinsurance, and out-of-pocket max is then measured based on cumulative probability distributions (CPDs), where the

value of services that apply to the CPDs adjusts the level of the curve, as well as global utilization adjustments.

- c. Two points on how the model does not reflect morbidity:
 - I. The model pulls from millions of lives and adjusts relative value by only the value of cost-sharing and differences in utilization (for example, cost barriers to emergency room care such as \$500 copay, will not only reduce ER costs by \$500, but more than \$500 because members will find alternative, less costly care).
 - II. The actuarial model is intended to produce benefit relativities that are offered to employers with several benefit options. Small Groups are able to select up to five benefit options. If the value of morbidity is priced into lower AV plans, higher morbidity members will begin to choose those plans because the difference in premium outweighs the difference in benefits (members can set premium dollars aside to pay for the extra cost-sharing). That will result in the deterioration of lower AV plans, and pricing would then be modified. For this reason, the model is designed to not reflect morbidity by plan. The same model/methodology is used in the Individual market.

Question 3. Follow-up to question 15: according to the URR instructions, the induced utilization must be normalized. This adjustment should be made in Table 10 since the induced demand cannot be used to increase or decrease the projected index rates only to adjust between plans. The normalization can be done based on projected membership rather than the default in Table 10.

Answer 3. With this submission, I have changed my methodology described in question 15. The same calculation is performed but the results of 2c are now an interim step in the pricing AV calculation. 2c factor is applied to the pricing AV previously reported. Induced demand is 1.0.

Question 4. Follow-up to question 19: How were target loss ratios for each region developed and why do they vary by region?

Answer 4. The target loss ratios are described below. The purpose of varying target loss ratios is to incrementally change regional rating factors. For example, if region 7 would be priced based on an average target loss ratio, rates would increase by approximately [requested rate change] + 7% (region 7 projected LR (without GRA rating factor change) – avg target LR). But the incremental approach results in [requested rate change] +4%.

CBC performed regional analysis to quantify the cost difference between the three regions in our service area. The analysis gathered incurred claims net Rx rebates, projected risk adjustment, and premium for a 12-month period by region. The loss ratio of each region is then compared to the average loss ratio for the book of business. In theory, the change in regional rating factor is:

[Change in Regional Rating Factor Region A] = [Region A LR] \div [BOB LR]

But our preferred approach is to gradually change factors, so not to shock the market, while moving rates in the appropriate direction. In order to do this, the following approach is being proposed:

[Change in Regional Rating Factor Region A] = [Region A LR] \div [Target LR]

Where Target LR is in between Region A LR and BOB LR. With this gradual approach, annual rate change by region is shown on Exhibit Q, column G.

Question 5. Follow-up to question 26: the updated actuarial memorandum page 2 shows a rate decrease of 2.4% due to Reimplementation of the Health Insurer Fee: 3.0% and Catastrophic plan performance better than forecasted: -5%. Why isn't trend and other factors in the PAAM Table 8 included in the rate change drivers?

Answer 5. The actuarial memorandum has been updated to include cost and utilization as a driver.

Question 6. Follow-up to questions 7 and 28: to support the leveraging factor, please provide your paid claim trends and allowed claim trends for the last 5 years showing that the paid trends are 1% higher than the allowed trends.

Answer 6. With this submission, the trend leveraging adjustment has been removed.

Question 7. Follow-up to question 32: please explain market and rate staging with other CBC subsidiaries.

Answer 7. CBC offers catastrophic plans under both CAIC and subsidiary, Keystone Health Plan Central (KHPC). From a customer's viewpoint, the difference in price between the two plans should be explainable by network and utilization management differences between the plans. CBC strives to align prices of similar plans across subsidiaries.

Question 8. Follow-up to question 35.e: Why is the average benefit richness in Table 7 0.74 when the benefit richness for the one plan is 1.351. It appears that Table 7 is the inverse and not the average. Please correct Table 7 to be the average benefit richness and use the resulting normalization factor. This should be coordinated with question 2 above.

Answer 8. With this submission, induced demand is 1.0.

Question 9. Follow-up to question 36: Your reply did not include the financial information for the 2019 and 2020 projections. Please provide the financial information for 2019 and 2020 projections.

Answer 9. Please see Q&A Exhibit 1 for projected 2019 and 2020 results.

Question 10. The Revised PAAM exhibits is not using the template sent by PID on June 18, 2019. Table 6 does not show the Risk Adjustment User Fee in Row 54. Please upload the corrected version.

Answer 10. With this submission, the correct template is being used.

Question 11. If the risk adjustment results released on June 28, 2019 are inconsistent with your projected assumptions, you may modify the risk adjustment transfer amount in Table 5. If such a modification is made, revise all the documents and exhibits impacted and the PA Actuarial Memorandum to discuss this change. This change must be made with your responses due by July 12, 2019.

Answer 11. With this submission, we have updated all exhibits and memos to reflect actual 2018 risk adjustment results released on June 28, 2019. While the updated projected risk adjustment calculation shows a slight payable amount (-\$0.83 PMPM), the projected risk adjustment amount applied is unchanged at \$0. The updated risk adjustment calculation is found in Ind 19-42 Initial CAIC PPO RACalc201905 Supporting CONF 20190712.xlsx.

Question 12. In response to the Department's RADV survey, issuers indicated that they did not include an adjustment in the initial submission, as there was no supportable reason for a RADV adjustment in the 2020 rate submission. Therefore, the Department has determined that there should be no RADV adjustments in the 2020 rate filings; please modify the filing accordingly, if necessary.

Answer 12. CBC has not included the impact of RADV and therefore no modification is necessary.

Capital Advantage Insurance Company Individual Rates Q&A Exhibit 1 Financial Projection History

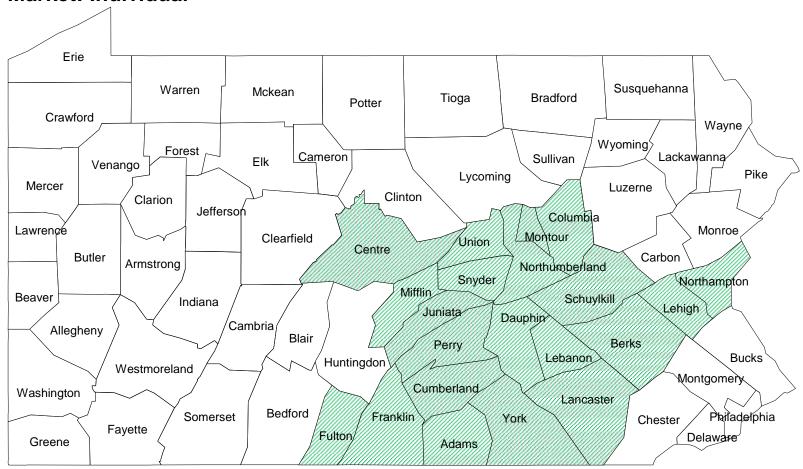
Year	Member Months	Total Admin	Total Incurred	Total Premium	Total Taxes & Fees	Total Profit	Annual Underwriting gain/loss	Annual Underwriting gain/loss PMPY
2019*	254	\$13,192	\$32,652	\$64,023	\$2,560	\$15,619	\$15,619	\$737.92
2020	752	\$36,427	\$132,772	\$182,220	\$9,377	\$3,644	\$3,644	\$58.16

^{*2019} MemberMonths, Incurred and Premium are from CBC's 2019 Corporate Budget. 2019 Admin and Taxes are 2019 filed PMPMs x Budget Membership

2019 Service Area

Issuer: 82795

Market: Individual



Key (modify as needed)

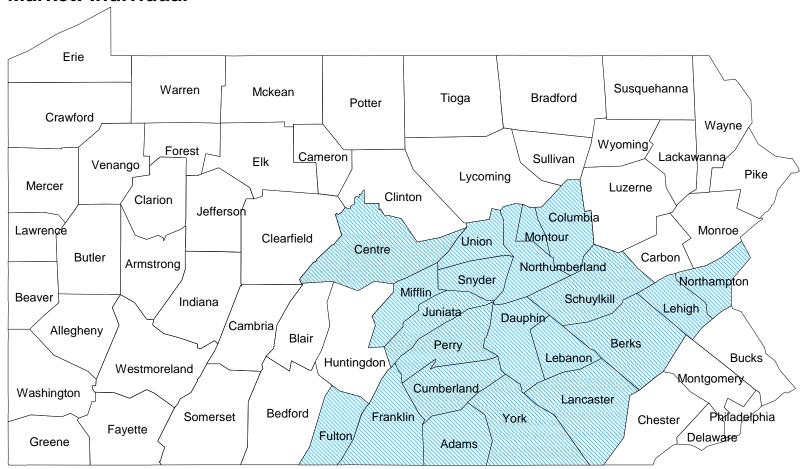
: 2019 on-exchange service area

: 2019 off-exchange only service area

2020 Service Area

Issuer: 82795

Market: Individual



Key (modify as needed)

: 2020 on-exchange service area

: 2020 off-exchange only service area