

SERFF Tracking #:

UPMC-130536844

State Tracking #:

UPMC-130536844

Company Tracking #:

State: Pennsylvania

Filing Company: UPMC Health Options, Inc.

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

Product Name: 2017 IND Health Options

Project Name/Number: /

Correspondence Summary

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Additional Information Needed	Rashmi Mathur	07/21/2016	07/21/2016
Additional Information Needed	Rashmi Mathur	07/13/2016	07/13/2016
Additional Information Needed	Rashmi Mathur	06/17/2016	06/17/2016
Pending Industry Response	Art Lucker	06/02/2016	06/02/2016
Pending Industry Response	Art Lucker	05/26/2016	05/26/2016
Pending Industry Response	Art Lucker	05/05/2016	05/05/2016

Response Letters

Responded By	Created On	Date Submitted
Timothy Gaborek	07/26/2016	07/26/2016
Timothy Gaborek	07/19/2016	07/19/2016
Timothy Gaborek	06/24/2016	06/24/2016
Timothy Gaborek	06/06/2016	06/06/2016
Timothy Gaborek	05/31/2016	05/31/2016
Timothy Gaborek	05/19/2016	05/19/2016

State: Pennsylvania **Filing Company:** UPMC Health Options, Inc.
TOI/Sub-TOI: H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense
Product Name: 2017 IND Health Options
Project Name/Number: /

Objection Letter

Objection Letter Status	Additional Information Needed
Objection Letter Date	07/21/2016
Submitted Date	07/21/2016
Respond By Date	07/26/2016

Dear Mike Lovely,

Introduction:

The Pennsylvania Insurance Department has conducted a review of the responses received from you on the above captioned filing, and at this time additional information is needed. To facilitate a timely review, we request this information be provided by close of business on July 26, 2016. If you have any questions or difficulties in providing the data within this time frame, please call me.

1. Given the difference between the Company's estimated risk adjustment for 2015 and actual 2015 amount, please provide narrative and quantitatively show the development of the pmpm impact this will have on the projected 2017 risk adjustment pmpm amount and the rate impact. Do not revise your filing because of this request; just provide the information requested.

Upon receipt of your response to the above requested data, the Department will continue to review your filing. Please note that there may be additional questions and/or requirements as the Department conducts a more in-depth review.

Should you have any questions regarding this correspondence, please contact me at (717) 783-0675 or e-mail at rmathur@pa.gov.

Sincerely,

Rashmi Mathur, ASA, MAAA
Actuary
Bureau of Life, Accident & Health Insurance
Office of Insurance Product Regulation & Administration

Conclusion:

Sincerely,
Rashmi Mathur

State: Pennsylvania **Filing Company:** UPMC Health Options, Inc.
TOI/Sub-TOI: H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense
Product Name: 2017 IND Health Options
Project Name/Number: /

Objection Letter

Objection Letter Status	Additional Information Needed
Objection Letter Date	07/13/2016
Submitted Date	07/13/2016
Respond By Date	07/19/2016

Dear Mike Lovely,

Introduction:

Please see the attachment that has additional questions on induced Utilization and AV of the plans. Please respond to these questions by close of business on Tuesday, July 19, 2016.
Thank you.

Conclusion:

Sincerely,
Rashmi Mathur

1. Induced Utilization

- a. Please complete the table below for all plans, and confirm that the ratio in column (8) represents the AV and Cost Sharing for each plan in your filing.¹

Plan ID (1)	Metal Level (2)	Projected Membership (3)	Projected Allowed Claims (4)	Projected Paid Claims (5)	Company Determined AV Factor (6)	Induced Utilization ² (7)	AV & Cost Sharing (6)*(7) (8)
xxxxxx							
xxxxxx							
xxxxxx							
Total							

- b. Please show quantitatively, including an Excel spreadsheet with formulas, the derivation of each, the AV and the cost sharing factors for each plan. Also, provide narrative that explains the derivation.
- c. Please provide justification for relative induced utilization assumptions in the Company's pricing that exceed the federal factors used in the risk adjustment model proving that morbidity is not reflected.³
- d. Please confirm that each plan's induced utilization factor was normalized by an aggregate factor, and that the resulting sumproduct (against projected membership) produces a factor of 1.000. Please show the steps that demonstrate this.
2. Please show quantitatively that plan premiums are in proportion to the plan AV Pricing Values.

¹ If a tobacco factor is used in the AV and Cost Sharing please add a column for that amount and modify the formula.

² The Induced Demand is the amount used by the company to reflect increased demand. This may be called by another name in the filing

³ The federal factors relative to the Bronze factors are Silver 1.03, Gold 1.08 and Platinum 1.15.

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Product Name: 2017 IND Health Options
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Objection Letter

Objection Letter Status	Additional Information Needed
Objection Letter Date	06/17/2016
Submitted Date	06/17/2016
Respond By Date	

Dear Mike Lovely,

Introduction:

The Pennsylvania Insurance Department has received and conducted a preliminary review of the above captioned filing. In order to complete the review, we are requesting the following information. To facilitate a timely review, we request this information be provided within 7 days of the date of this letter. If you have any questions or difficulties in providing the data within this time frame, please call me.

1. Please provide the January 1, 2016 through April 30, 2016 emerging experience in an Excel worksheet formatted similar to Table 2.

2. Please confirm that the PMPM Risk Adjustment User Fee used was \$0.13. Confirm that it was included in the "Projected Risk Adjustments PMPM" in Section III of Worksheet 1 and that it was not included in the "Taxes and Fees".

3. Please provide quantitative support, in Excel with working formulas, for the development of \$7.81, the projected Risk Adjustment using the federal formula. Please provide a detailed narrative that describes the development of the estimated risk adjustment transfer payment. In demonstrating the development of the transfer payment, please show all risk transfer formula components, the estimated market-wide average risk assumptions as well as support for those assumptions. When responding to this data call, you may redact this response as it will contain proprietary information.

4. In Tables 2 and 4, does the premium include HHS cost sharing, estimated risk adjustment or revenue generated from transitional business? If so, please provide the dollar amount of HHS cost sharing and estimated risk adjustment and the number of transitional members.

5. In Tables 2 and 4, please provide the dollar amount of incurred and allowed claims for transitional members.

6. Please indicate if the Company included an adjustment to account for the regulation that prohibits charging for more than three children per family, and, if applicable, demonstrate how the adjustment was derived and where it is included in the filing.

7. Please discuss the impact SEP enrollees have had on your company's claims experience. If possible provide the 2015 loss ratio for SEP enrollees and non-SEP enrollees.

8. Does your filing propose any changes in your pricing model? If so, please discuss. This response may be redacted since it may contain confidential information.

9. Please provide the actual and projected (according to the approved rate filing) general administrative expense, claims expense, agent/broker fees and commissions, and Quality Improvement Initiatives for calendar years 2014 and 2015 and the year to date 2016. If aggregate numbers were provided and approved in prior year filings, show the allocated amount of each.

10. Regarding broker commissions:

a) Under what circumstances and in what geographic locations will commissions be paid?

b) Are commissions paid for Special Enrollment Periods?

c) Provide a copy of the broker agreement – current and 2017.

d) Show the calculation of the average commission – current and 2017.

When responding to this question, you may provide a redacted version of the response as it contains proprietary information.

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11. Please be advised that each time the URRT is changed in SERFF, the URRT in HIOS must also be updated. Please acknowledge your understanding and certify that you are in compliance

Conclusion:

Upon receipt of your responses to the above requested data, the Department will continue to review your filing. Please note that there may be additional questions and/or requirements as the Department conducts a more in-depth review. Should you have any questions regarding this correspondence, please contact me at (717) 783-0675 or e-mail at rmathur@pa.gov. Sincerely,

Rashmi Mathur, ASA, MAAA
Actuary
Bureau of Life, Accident & Health Insurance
Office of Insurance Product Regulation & Administration

Sincerely,
Rashmi Mathur

State: Pennsylvania **Filing Company:** UPMC Health Options, Inc.
TOI/Sub-TOI: H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense
Product Name: 2017 IND Health Options
Project Name/Number: /

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	06/02/2016
Submitted Date	06/02/2016
Respond By Date	06/09/2016

Dear Mike Lovely,

Introduction:

Objection 1

- Actuarial Memorandum and Explanatory Information (A&H) (Supporting Document)

Comments: Please amend Section IV, Worksheet II of the Unified Rate Review Template so that the Total incurred claims, payable with issuer funds (row 94) reflects the amount of Projected Risk Adjustments. Please note that this is required according to the 2017 Unified Rate Review Instructions (page 49).

Conclusion:

Sincerely,
Art Lucker

State: Pennsylvania **Filing Company:** UPMC Health Options, Inc.
TOI/Sub-TOI: H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense
Product Name: 2017 IND Health Options
Project Name/Number: /

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	05/26/2016
Submitted Date	05/26/2016
Respond By Date	06/02/2016

Dear Mike Lovely,

Introduction:

Objection 1

- Actuarial Memorandum and Explanatory Information (A&H) (Supporting Document)

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

Conclusion:

Sincerely,
Art Lucker



INS CONSULTANTS, INC.

Insurance Regulatory Consultants

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

TO: Mike Lovely, ASA, MAAA
Manager, Actuarial Services

FROM: Gary Rosen, FSA, MAAA
INS Consultants, Inc.

DATE: May 26, 2016

SUBJECT: UPMC Health Options, Inc.
Individual PPO Rates for Calendar Year 2017
SERFF Tracking Number: UPMC-130536844

INS has been engaged by the Pennsylvania Insurance Department to review the material filed in support of the subject rate filings. Based on the review of your responses to our previous request, we have identified the following items which require further clarification. Upon receipt of the requested information, we will continue our review of the subject filing.

1. In calculating their Age Calibration Factor, most companies use the weighted average Premium Ratio derived from the table below:

Age	Premium Ratio	Membership
0-20 (3 or less)	0.635	
0-20 (4 or more)	0.000	
21	1.000	
22	1.000	
23	1.000	
24	1.000	
25	1.004	
⋮	⋮	
63	2.952	
64 & older	3.000	

- a. Please explain the logic behind the Company's methodology in calculating its Age Calibration Factor, as grouping the membership into eight separate groups is not something we have previously encountered.
 - b. Please indicate the source of the "Adjusted Age Factors" used in your calculation.
 - c. Please explain why age 40 has three different "Adjusted Age Factors"
2. Please indicate where in SERFF we can find a copy of the Supplemental Health Care Exhibit (SHCE) that was requested.
3. Both the Experience Period and Projected Index Rate differ from their corresponding Allowed Claims in Section II of the Unified Rate Review Template (URRT). Please show quantitatively, including a spreadsheet with formulas, the derivation of the Index Rates displayed in the URRT.

	Experience Period	Projected Period
Allowed Claims	405.16	424.43
Index Rate	405.67	424.21

Further, please explain why the Allowed Claims in Section II, Worksheet 1 of the URRT (\$405.16) differs so greatly from the Allowed Claims in Section I, Worksheet 1 of the URRT (\$381.83).

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Product Name: 2017 IND Health Options
Project Name/Number: /

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	05/05/2016
Submitted Date	05/05/2016
Respond By Date	05/19/2016

Dear Mike Lovely,

Introduction:

Objection 1

- Actuarial Memorandum and Explanatory Information (A&H) (Supporting Document)

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

Conclusion:

Sincerely,
Art Lucker



INS CONSULTANTS, INC.

Insurance Regulatory Consultants

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

TO: Mike Lovely, ASA, MAAA
Manager, Actuarial Services

FROM: Gary Rosen, FSA, MAAA
INS Consultants, Inc.

DATE: May 5, 2016

SUBJECT: UPMC Health Coverage, Inc.
Individual PPO Rates for Calendar Year 2017
SERFF Tracking Number: UPMC-130536844

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

1. Please provide a copy of the Supplemental Health Care Exhibit (SHCE) and describe the reason(s) for any differences between the SHCE and Worksheet 1, Section I of the Uniform Rate Review Template (URRT). Additionally, please provide a breakdown between ACA and non-ACA business in Part 1 of the SHCE.
2. The Company Rate Information page in SERFF indicates that the Overall, Maximum and Minimum rate changes are 14.6%, 18.4% and 11.5%, respectively. Please demonstrate how these amounts were determined.
3. Please provide a factor list (such as trend, morbidity changes, etc.) so that the compounded effect totals to the average rate increase of 14.6%. All factors should be justified and demonstrable.
4. Please provide a narrative which explains why UPMC expects the paid-to-allowed ratio to decrease from 82.1% (Experience Period) to 73.7% (Projection Period).
5. Please show quantitatively, including an Excel spreadsheet with formulas, the derivation of the \$7.77 'Projected Risk Adjustments PMPM' found in Section III, Worksheet 1 of the URRT. Further, please explain why this amount does not correspond with the write-up in the Actuarial Memorandum. Finally, the Risk Adjustment Administration Fee has been set at \$1.56 PMPY for 2017, and not \$2.00 PMPY as described in the Actuarial

Memorandum. Please make any necessary corrections to the Actuarial Memorandum and/or the URRT.

6. Please indicate if the Marketplace User Fees are included in either ‘Administrative Expenses’ or ‘Taxes and Fees’.
 - a. If not, please explain why they are not included.
 - b. If they are included, then they must be removed from the appropriate factor when calculating the Plan Adjusted Index Rates (since they were already included in calculating the Market Adjusted Index Rate).
7. Regarding the ‘Profit and Risk Load’:
 - a. Please provide the Company’s best estimate for the number of years the negative profit margin is expected to continue.
 - b. Please explain why the negative target profit levels are not in violation of Actuarial Standard of Practice No. 26, Sections 2.1 and 3.3 (actuarial soundness).
8. Please show quantitatively, including an Excel spreadsheet with formulas, the derivation of the Age Calibration Factor.
9. Please show quantitatively, including an Excel spreadsheet with formulas, the derivation of the Projected Member Months of 1,434,564. In addition, please explain why UPMC expects such a dramatic increase in enrollment for 2017.
10. For Silver level plans sold in the Marketplace, please describe the methodology used to estimate the portion of the projected enrollment that will be eligible for cost sharing reduction subsidies at each subsidy level. In addition, please provide the resulting projected enrollment by plan and subsidy level.
11. The Actuarial Memorandum states that “A tobacco load is not applied for this market segment”, but the premiums in the Rates Data Template are on a Tobacco/non-Tobacco basis. Please explain the apparent discrepancy and make any necessary corrections.
12. Under the assumption that the Individual segment does have Tobacco/non-Tobacco premiums, it appears that the “Tobacco Surcharge Adjustment” is being applied incorrectly in calculating the Plan Adjusted Index Rate. The factor should be the inverse of 1.002641, or 0.997366. Please make any necessary corrections.
13. Please confirm that the UPMC is in compliance with the family rating requirement, i.e., 3-child limit \leq age 20. What, if any, was the additional load built in to cover the 3-child limit rating restriction?
14. For each area, please provide a chart (in Excel) showing Plan ID, Product Name, Plan Name, Metal Level, Exchange Plan (Y/N), 2014 Age 21 Premium Non-Tobacco, 2015 Age 21 Premium Non-Tobacco, 2015 Percentage Change, 2016 Age 21 Premium Non-Tobacco, 2016 Percentage Change, 2017 Age 21 Premium Non-Tobacco, 2017 Percentage Change.

Geographic Area 1			2014	2015	2015	2016	2016	2017	2017	Total
Plan ID	Metal Level	Plan Name	Age 21, NT Prem	Age 21, NT Prem	% Change	Age 21, NT Prem	% Change	Age 21, NT Prem	% Change	% Change

15. Regarding the Geographic Areas:
- a. Please provide the Projected Member Months by geographic rating area.
 - b. Changing all of the geographic rating area factors to 1.000 has caused some significant premium changes, particularly in Area 6. Please expand on your rationale for doing this, as the overall level of experience used for the Credibility Manual appears to be very credible.
 - c. Please describe the methodology used to determine the geographic area rating factors for calendar year 2016.
16. The term “Community Rated Plans” is used in the Actuarial Memorandum. Please define how the Company is using this phrase. Is it referring to ACA plans or to the providing of insurance to all members for the same premium, regardless of age, health status, tobacco usage, etc.?

State: Pennsylvania **Filing Company:** UPMC Health Options, Inc.
TOI/Sub-TOI: H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense
Product Name: 2017 IND Health Options
Project Name/Number: /

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	07/26/2016
Submitted Date	07/26/2016

Dear Art Lucker,

Introduction:

Response 1

Comments:

We have not prepared a formal response to this objection because we are currently revising our filing due to the released Risk Adjustment amounts by the deadline of 7/28.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,
Timothy Gaborek

State:	Pennsylvania	Filing Company:	UPMC Health Options, Inc.
TOI/Sub-TOI:	H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense		
Product Name:	2017 IND Health Options		
Project Name/Number:	/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	07/19/2016
Submitted Date	07/19/2016

Dear Art Lucker,

Introduction:

Response 1

Comments:

Responses have been uploaded into the Supporting Documentation tab in SERFF.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Responses to Objection Letter 07-13-16
Comments:	
Attachment(s):	HO IND Work for Response to Objection 07-13-16.pdf HO IND Work for Response to Objection 07-13-16.xlsx HO IND Responses to Objection Letter 07-13-16.pdf HO IND Responses to Objection Letter 07-13-16.xlsx

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,
Michael Lovely

State:	Pennsylvania	Filing Company:	UPMC Health Options, Inc.
TOI/Sub-TOI:	H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense		
Product Name:	2017 IND Health Options		
Project Name/Number:	/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	06/24/2016
Submitted Date	06/24/2016

Dear Art Lucker,

Introduction:

Response 1

Comments:

Responses have been uploaded into the Supporting Documentation tab in SERFF.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Risk Adjustment Transfer Payment Calculation Methodology from Optum
Comments:	
Attachment(s):	UPMC ACA Accrual Report 201505.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	Risk Adjustment Transfer Payment Calculation Methodology from Optum
Comments:	
Attachment(s):	UPMC ACA Accrual Report 201505.pdf

Satisfied - Item:	Current Broker Agreement
Comments:	
Attachment(s):	2016 Individual Standard Producer Commission Schedule.pdf

State:	Pennsylvania	Filing Company:	UPMC Health Options, Inc.
TOI/Sub-TOI:	H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense		
Product Name:	2017 IND Health Options		
Project Name/Number:	/		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Risk Adjustment Transfer Payment Calculation Methodology from Optum
Comments:	
Attachment(s):	UPMC ACA Accrual Report 201505.pdf
Satisfied - Item:	Current Broker Agreement
Comments:	
Attachment(s):	2016 Individual Standard Producer Commission Schedule.pdf
Satisfied - Item:	Responses to Objection Letter 06-17-16
Comments:	
Attachment(s):	HO IND Work for Response to Objection 06-17-16.pdf HO IND Work for Response to Objection 06-17-16.xlsx HO IND Responses to Objection Letter 06-17-16.pdf HO IND Responses to Objection Letter 06-17-16.xlsx

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,
Timothy Gaborek

State:	Pennsylvania	Filing Company:	UPMC Health Options, Inc.
TOI/Sub-TOI:	H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense		
Product Name:	2017 IND Health Options		
Project Name/Number:	/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	06/06/2016
Submitted Date	06/06/2016

Dear Art Lucker,

Introduction:

Response 1

Comments:

This has been fixed in the updated URRT.

Related Objection 1

Applies To:

- Actuarial Memorandum and Explanatory Information (A&H) (Supporting Document)

Comments: Please amend Section IV, Worksheet II of the Unified Rate Review Template so that the Total incurred claims, payable with issuer funds (row 94) reflects the amount of Projected Risk Adjustments. Please note that this is required according to the 2017 Unified Rate Review Instructions (page 49).

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Unified Rate Review Template
Comments:	
Attachment(s):	Unified_Rate_Review_Template.xlsx
<i>Previous Version</i>	
Satisfied - Item:	Unified Rate Review Template
Comments:	
Attachment(s):	Unified_Rate_Review_Template.xlsx
<i>Previous Version</i>	
Satisfied - Item:	Unified Rate Review Template
Comments:	
Attachment(s):	Unified_Rate_Review_Template.xlsx

No Form Schedule items changed.

SERFF Tracking #:

UPMC-130536844

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Company Tracking #:

State:

Pennsylvania

Filing Company:

UPMC Health Options, Inc.

TOI/Sub-TOI:

H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense

Product Name:

2017 IND Health Options

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/

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,

Timothy Gaborek

State:	Pennsylvania	Filing Company:	UPMC Health Options, Inc.
TOI/Sub-TOI:	H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense		
Product Name:	2017 IND Health Options		
Project Name/Number:	/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/31/2016
Submitted Date	05/31/2016

Dear Art Lucker,

Introduction:

Response 1

Comments:

Responses to objection letter have been added.

Related Objection 1

Applies To:

- Actuarial Memorandum and Explanatory Information (A&H) (Supporting Document)

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

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Responses to Objection Letter 05-26-16
Comments:	
Attachment(s):	HO IND Responses to Objection Letter 05-26-16.xlsx

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,

Timothy Gaborek

State:	Pennsylvania	Filing Company:	UPMC Health Options, Inc.
TOI/Sub-TOI:	H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense		
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Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/19/2016
Submitted Date	05/19/2016

Dear Art Lucker,

Introduction:

Response 1

Comments:

The rate increases listed in the PA Bulletin Info, Transmittal Letter, Rate Change Request Summary, and the Rate/Rule Schedule tab have been updated to match those listed in Table 10 of the PA Actuarial Memorandum Rate Exhibits'. Dollar amounts were also added to the rate increases listed in the PA Bulletin Info document. The value listed under 'Number of Policy Holders Affected for this Program' was checked/changed as necessary to reflect the number of covered lives affected for this program per request from PID.

Related Objection 1

Applies To:

- Actuarial Memorandum and Explanatory Information (A&H) (Supporting Document)

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

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Transmittal Letter (A&H)
Comments:	
Attachment(s):	UPMC Health Options Individual Transmittal Letter UPMC-130536844.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Transmittal Letter (A&H)</i>
Comments:	
Attachment(s):	<i>UPMC Health Options Individual Transmittal Letter UPMC-130536844.pdf</i>

SERFF Tracking #:	UPMC-130536844	State Tracking #:	UPMC-130536844	Company Tracking #:	
State:	Pennsylvania	Filing Company:	UPMC Health Options, Inc.		
TOI/Sub-TOI:	H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense				
Product Name:	2017 IND Health Options				
Project Name/Number:	/				

Supporting Document Schedule Item Changes	
Satisfied - Item:	Transmittal Letter (A&H)
Comments:	
Attachment(s):	UPMC Health Options Individual Transmittal Letter UPMC-130536844.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Transmittal Letter (A&H)</i>
Comments:	
Attachment(s):	<i>UPMC Health Options Individual Transmittal Letter UPMC-130536844.pdf</i>
Satisfied - Item:	Actuarial Memorandum and Certifications
Comments:	
Attachment(s):	UPMC Health Options Individual Actuarial Memorandum UPMC-130536844.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Actuarial Memorandum and Certifications</i>
Comments:	
Attachment(s):	<i>UPMC Health Options Individual Actuarial Memorandum UPMC-130536844.pdf</i>

SERFF Tracking #:	UPMC-130536844	State Tracking #:	UPMC-130536844	Company Tracking #:	
State:	Pennsylvania	Filing Company:	UPMC Health Options, Inc.		
TOI/Sub-TOI:	H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense				
Product Name:	2017 IND Health Options				
Project Name/Number:	/				

Supporting Document Schedule Item Changes	
Satisfied - Item:	Transmittal Letter (A&H)
Comments:	
Attachment(s):	UPMC Health Options Individual Transmittal Letter UPMC-130536844.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Transmittal Letter (A&H)</i>
Comments:	
Attachment(s):	<i>UPMC Health Options Individual Transmittal Letter UPMC-130536844.pdf</i>
Satisfied - Item:	Actuarial Memorandum and Certifications
Comments:	
Attachment(s):	UPMC Health Options Individual Actuarial Memorandum UPMC-130536844.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Actuarial Memorandum and Certifications</i>
Comments:	
Attachment(s):	<i>UPMC Health Options Individual Actuarial Memorandum UPMC-130536844.pdf</i>
Satisfied - Item:	Rate Change Request Summary
Comments:	
Attachment(s):	UPMC Health Options Individual Rate Change Request Summary UPMC-130536844.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Rate Change Request Summary</i>
Comments:	
Attachment(s):	<i>UPMC Health Options Individual Rate Change Request Summary UPMC-130536844.pdf</i>

SERFF Tracking #:	UPMC-130536844	State Tracking #:	UPMC-130536844	Company Tracking #:	
State:	Pennsylvania	Filing Company:	UPMC Health Options, Inc.		
TOI/Sub-TOI:	H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense				
Product Name:	2017 IND Health Options				
Project Name/Number:	/				

Supporting Document Schedule Item Changes	
Satisfied - Item:	Transmittal Letter (A&H)
Comments:	
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Comments:	
Attachment(s):	<i>UPMC Health Options Individual Transmittal Letter UPMC-130536844.pdf</i>
Satisfied - Item:	Actuarial Memorandum and Certifications
Comments:	
Attachment(s):	UPMC Health Options Individual Actuarial Memorandum UPMC-130536844.pdf
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Attachment(s):	<i>UPMC Health Options Individual Rate Change Request Summary UPMC-130536844.pdf</i>
Satisfied - Item:	Rate Table (A&H)
Comments:	
Attachment(s):	RatesTablesTempalte_v6_0.xls PA Plan Design Summary and Rate Tables-1.xlsx PA Plan Design Summary and Rate Tables-1.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Rate Table (A&H)</i>
Comments:	
Attachment(s):	<i>RatesTablesTempalte_v6_0.xls</i>

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Product Name:	2017 IND Health Options		
Project Name/Number:	/		

	<i>PA Plan Design Summary and Rate Tables-1.xlsx</i> <i>PA Plan Design Summary and Rate Tables-1.pdf</i>
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Product Name:	2017 IND Health Options		
Project Name/Number:	/		

	<i>PA Plan Design Summary and Rate Tables-1.xlsx</i> <i>PA Plan Design Summary and Rate Tables-1.pdf</i>
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Satisfied - Item:	Unified Rate Review Template
Comments:	
Attachment(s):	Unified_Rate_Review_Template.xlsm
<i>Previous Version</i>	
Satisfied - Item:	<i>Unified Rate Review Template</i>
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Satisfied - Item:	PA Actuarial Memorandum Rate Exhibits
Comments:	
Attachment(s):	FINAL 2017 PA Actuarial Memorandum Rate Exhibits Rev 4-21-2016.xlsx
<i>Previous Version</i>	
Satisfied - Item:	<i>PA Actuarial Memorandum Rate Exhibits</i>
Comments:	
Attachment(s):	<i>FINAL 2017 PA Actuarial Memorandum Rate Exhibits Rev 4-21-2016.xlsx</i>

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Comments:	
Attachment(s):	<i>FINAL 2017 PA Actuarial Memorandum Rate Exhibits Rev 4-21-2016.xlsx</i>

Satisfied - Item:	PA Bulletin Information
Comments:	
Attachment(s):	UPMC Health Options Individual PA Bulletin Info UPMC-130536844.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>PA Bulletin Information</i>
Comments:	
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Product Name:	2017 IND Health Options		
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	<i>PA Plan Design Summary and Rate Tables-1.xlsx</i> <i>PA Plan Design Summary and Rate Tables-1.pdf</i>
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<i>Previous Version</i>	
Satisfied - Item:	<i>PA Bulletin Information</i>
Comments:	
Attachment(s):	<i>UPMC Health Options Individual PA Bulletin Info UPMC-130536844.pdf</i>

Satisfied - Item:	Responses to Objection Letter 05-05-16
Comments:	
Attachment(s):	HO IND Work for Response to Objection 05-05-16.xlsx HO IND Responses to Objection Letter 05-05-16.xlsx

No Form Schedule items changed.

SERFF Tracking #:

UPMC-130536844

State Tracking #:

UPMC-130536844

Company Tracking #:

State: Pennsylvania

Filing Company: UPMC Health Options, Inc.

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

Product Name: 2017 IND Health Options

Project Name/Number: /

Rate/Rule Schedule Item Changes						
Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	Federal Rates Template		Revised	Previous State Filing Number: UPMC-130071357 Percent Rate Change Request: 16.2	RatesTablesTempalte_v6_0.xls,	05/19/2016 By: Timothy Gaborek
<i>Previous Version</i>						
1	<i>Federal Rates Template</i>		<i>Revised</i>	<i>Previous State Filing Number: UPMC-130071357 Percent Rate Change Request: 14.6</i>	<i>RatesTablesTempalte_v6_0.xls,</i>	<i>04/27/2016 By: Michael Lovely</i>
2	PID Rates Template		Revised	Previous State Filing Number: UPMC-130071357 Percent Rate Change Request: 16.2	PA Plan Design Summary and Rate Tables-1.xlsx, PA Plan Design Summary and Rate Tables-1.pdf,	05/19/2016 By: Timothy Gaborek
<i>Previous Version</i>						
2	<i>PID Rates Template</i>		<i>Revised</i>	<i>Previous State Filing Number: UPMC-130071357 Percent Rate Change Request: 14.6</i>	<i>PA Plan Design Summary and Rate Tables-1.xlsx, PA Plan Design Summary and Rate Tables-1.pdf,</i>	<i>04/27/2016 By: Michael Lovely</i>

Conclusion:

Sincerely,
Timothy Gaborek

SERFF Tracking #:	UPMC-130536844	State Tracking #:	UPMC-130536844	Company Tracking #:	
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Product Name:	2017 IND Health Options				
Project Name/Number:	/				

Supporting Document Schedules

Satisfied - Item:	Responses to Objection Letter 05-26-16
Comments:	
Attachment(s):	HO IND Responses to Objection Letter 05-26-16.xlsx HO IND Responses to Objection Letter 05-26-16.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Responses to Objection Letter 05-05-16 - Redacted
Comments:	
Attachment(s):	HO IND Responses to Objection Letter 05-05-16 Redacted.pdf HO IND Work for Response to Objection 05-05-16 Redacted.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Responses to Objection Letter 06-17-16 - Redacted
Comments:	
Attachment(s):	HO IND Responses to Objection Letter 06-17-16 Redacted.pdf HO IND Work for Response to Objection 06-17-16 Redacted.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Responses to Objection Letter 07-13-16
Comments:	
Attachment(s):	HO IND Work for Response to Objection 07-13-16.pdf HO IND Work for Response to Objection 07-13-16.xlsx HO IND Responses to Objection Letter 07-13-16.pdf HO IND Responses to Objection Letter 07-13-16.xlsx
Item Status:	
Status Date:	

SERFF Tracking #:

UPMC-130536844

State Tracking #:

UPMC-130536844

Company Tracking #:

State:

Pennsylvania

Filing Company:

UPMC Health Options, Inc.

TOI/Sub-TOI:

H15I Individual Health - Hospital/Surgical/Medical Expense/H15I.001 Health - Hospital/Surgical/Medical Expense

Product Name:

2017 IND Health Options

Project Name/Number:

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Attachment HO IND Work for Response to Objection 07-13-16.xlsx is not a PDF document and cannot be reproduced here.

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Question	Comment/Request	Response
1	<p>In calculating their Age Calibration Factor, most companies use the weighted average Premium Ratio derived from the table below (table excluded):</p> <p>a. Please explain the logic behind the Company's methodology in calculating its Age Calibration Factor, as grouping the membership into eight separate groups is not something we have previously encountered.</p> <p>b. Please indicate the source of the "Adjusted Age Factors" used in your calculation.</p> <p>c. Please explain why age 40 has three different "Adjusted Age Factors"</p>	<p>a. We used the prescribed premium ratio table when calculating these factors. We pulled them in summary alongside network and area data in order to back out age factor differences when determining network/area factors.</p> <p>b. We used the prescribed premium ratio table when calculating these factors.</p> <p>c. This is due to the fact that different populations may have a similar average age but a different average age factor using the premium ratio table because of differences in age distribution between the populations.</p>
2	Please indicate where in SERFF we can find a copy of the Supplemental Health Care Exhibit (SHCE) that was requested.	The SHCE has been included in the 'Supporting Documentation' tab in SERFF.
3	<p>Both the Experience Period and Projected Index Rate differ from their corresponding Allowed Claims in Section II of the Unified Rate Review Template (URRT). Please show quantitatively, including a spreadsheet with formulas, the derivation of the Index Rates displayed in the URRT (table excluded).</p> <p>Further, please explain why the Allowed Claims in Section II, Worksheet 1 of the URRT (\$405.16) differs so greatly from the Allowed Claims in Section I, Worksheet 1 of the URRT (\$381.83).</p>	<p>The Index Rate of Experience Period is taken from the value that is calculated for '2015 Total Allowed EHB Claims + EHB Capitation PMPM (net of prescription drug rebates)' in Table 2 of the 'PA Actuarial Memorandum Rate Exhibits'. The Index Rate of Projection Period is taken from the value that is calculated for 'Adjusted Projected Allowed EHB Claims PMPM' in Table 5 of the 'PA Actuarial Memorandum Rate Exhibits'. The disparity between Allowed Claims and the Index Rates arises from the fact that the Index Rate is calculated from a data pull where Experience Period data is not broken down by benefit category, while the Allowed Claims value is calculated from a entirely separate data pull where data is broken down by benefit category. We believe the differences of \$0.51 and \$0.22 for the Experience Period and Projection Period, respectively, are negligible and are caused by a few claims not being assigned a category correctly in our data warehouse and thus getting lost in the mix when pulling data by category.</p> <p>The disparity between the Allowed Claims in Section II, Worksheet 1 of the URRT (\$405.16) and the Allowed Claims in Section I, Worksheet 1 of the URRT (\$381.83) comes from the fact that the latter accounts for received ACA Reinsurance reimbursements.</p>

Question	Comment/Request	Response
1	Please provide a copy of the Supplemental Health Care Exhibit (SHCE) and describe the reason(s) for any differences between the SHCE and Worksheet 1, Section I of the Uniform Rate Review Template (URRT). Additionally, please provide a breakdown between ACA and non-ACA business in Part 1 of the SHCE.	Differences between the SHCE and Worksheet 1, Section I of the URRT stem from the fact that the SHCE include restatements of estimates from the prior year, while the URRT only contains actual experience from 2015 (Experience Period). The data for Individual Health Options in Part 1 of the SHCE is all ACA-related.
2	The Company Rate Information page in SERFF indicates that the Overall, Maximum and Minimum rate changes are 14.6%, 18.4% and 11.5%, respectively. Please demonstrate how these amounts were determined.	The Overall, Maximum, and Minimum rate changes are now 16.2%, 18.5%, and 13.6%, respectively, as we were instructed by PID to use the rate changes calculated in Table 10 of the 'PA Actuarial Memorandum Rate Exhibits' for the Company Rate Information.
3	Please provide a factor list (such as trend, morbidity changes, etc.) so that the compounded effect totals to the average rate increase of 14.6%. All factors should be justified and demonstrable.	See 'HO IND Work for Response to Objection 05-05-16'. The Overall rate change is now 16.2% as we were instructed by PID to use the rate changes calculated in Table 10 of the 'PA Actuarial Memorandum Rate Exhibits' for the Company Rate Information. The 16.2% rate increase represents a change in expected claim payments as well as a step toward returning the business to profitability. The trend, morbidity, and other adjustments are subtracted from 2015 profit since they each represent a change in incurred claims from actual 2015 experience to 2017 projections. The difference is labelled as '2017 Profit before 2016 & 2017 Rate Changes'. This is what our expected 2017 profit would have been had there been no changes in rates or plan design. Our actual expected profit is -1.13%, which is a difference of 17.47%. 92.7% of this difference comes from our 2017 rate increase of 16.2%. The rest can be explained by the change in plans from 2015-2016. The methodology for that year was filed as a closing of 2015 plans and a new 2016 plan offering rather than a rate increasing involving mapping plans so an exact number is not available. But it is reasonable to assume that it can make up the rest of the 17.47%.
4	Please provide a narrative which explains why UPMC expects the paid-to-allowed ratio to decrease from 82.1% (Experience Period) to 73.7% (Projection Period).	The decrease in the paid-to-allowed ratio from the Experience Period to the Projection Period can be attributed to the loss of ACA Reinsurance in 2017 as well as the addition of new silver plans under Individual Health Options in 2017.
5	Please show quantitatively, including an Excel spreadsheet with formulas, the derivation of the \$7.77 'Projected Risk Adjustments PMPM' found in Section III, Worksheet 1 of the URRT. Further, please explain why this amount does not correspond with the write-up in the Actuarial Memorandum. Finally, the Risk Adjustment Administration Fee has been set at \$1.56 PMPY for 2017, and not \$2.00 PMPY as described in the Actuarial Memorandum. Please make any necessary corrections to the Actuarial Memorandum and/or the URRT.	The calculation for 'Projected Risk Adjustments PMPM' has been updated to include the \$1.56 PMPY Risk Adjustment Administration Fee for 2017, and this has also been corrected in the Actuarial Memorandum. This adjustment has caused the 'Projected Risk Adjustments PMPM' to change to \$7.81 PMPM, which has been reflected in the updated URRT. This value does not match that displayed in the Actuarial Memorandum because the latter is from the experience period, while the \$7.81 PMPM is the projected value for 2017. As indicated in 'HO IND Work for Response to Objection 05-05-16', when comparing actual UPMC enrollment in 2015 to projected UPMC enrollment in 2017 in the Individual market, there has been a significant increase, which has diluted the projected received Risk Adjustment amount.
6	Please indicate if the Marketplace User Fees are included in either 'Administrative Expenses' or 'Taxes and Fees'. a. If not, please explain why they are not included. b. If they are included, then they must be removed from the appropriate factor when calculating the Plan Adjusted Index Rates (since they were already included in calculating the Market Adjusted Index Rate).	a. Marketplace User Fees were initially not included in Table 6 of the 'PA Actuarial Memorandum Rate Exhibits' and the URRT to keep the 'Taxes and Fees' values consistent between the templates. They have now been added to the 'Taxes and Fees' field in the updated URRT per the URRT instructions. b. Marketplace User Fees were not included in the calculation of the Plan Adjusted Index Rates.
7	Regarding the 'Profit and Risk Load': a. Please provide the Company's best estimate for the number of years the negative profit margin is expected to continue. b. Please explain why the negative target profit levels are not in violation of Actuarial Standard of Practice No. 26, Sections 2.1 and 3.3 (actuarial soundness).	a. We estimate that the product will return to profitability by 2019. b. These products are currently running at a negative profit margin that reflects greater losses than the projected negative margin for CY2017 under the submitted rate changes. While we acknowledge the potential discrepancy regarding actuarial soundness for CY2017, we note that the projected negative margin is minimal at approximately 1%, and believe that a gradual or phased-in consumer rate impact is favorable over a sharp single-year increase. To this end, we would also note that a sharp single-year increase could in fact promote attrition of the current member population, which has its own potential to impair the expected return to profitability. We believe the -1.13% margin is a reasonable compromise that positions the product for a return to profitable margins in the near future.
8	Please show quantitatively, including an Excel spreadsheet with formulas, the derivation of the Age Calibration Factor.	See 'HO IND Work for Response to Objection 05-05-16'.

9	Please show quantitatively, including an Excel spreadsheet with formulas, the derivation of the Projected Member Months of 1,434,564. In addition, please explain why UPMC expects such a dramatic increase in enrollment for 2017.	See 'HO IND Work for Response to Objection 05-05-16'. This is not a dramatic increase because the enrollment for Individual Health Options in February 2016 is 110,825, as indicated in Table 1 of the 'PA Actuarial Memorandum Rate Exhibits'. Calculating member months using this enrollment for every month of 2016 produces a total of 1,329,900 member months for 2016. This is only slightly less than the total of 1,434,564 member months projected for 2017.
10	For Silver level plans sold in the Marketplace, please describe the methodology used to estimate the portion of the projected enrollment that will be eligible for cost sharing reduction subsidies at each subsidy level. In addition, please provide the resulting projected enrollment by plan and subsidy level.	[This response redacted for publication.]
11	The Actuarial Memorandum states that "A tobacco load is not applied for this market segment", but the premiums in the Rates Data Template are on a Tobacco/non-Tobacco basis. Please explain the apparent discrepancy and make any necessary corrections.	This was an error and has been corrected in the Actuarial Memorandum.
12	Under the assumption that the Individual segment does have Tobacco/non-Tobacco premiums, it appears that the "Tobacco Surcharge Adjustment" is being applied incorrectly in calculating the Plan Adjusted Index Rate. The factor should be the inverse of 1.002641, or 0.997366. Please make any necessary corrections.	This has been corrected in the Plan Adjusted Index Rate calculations and Actuarial Memorandum.
13	Please confirm that the UPMC is in compliance with the family rating requirement, i.e., 3-child limit ≤ age 20. What, if any, was the additional load built in to cover the 3-child limit rating restriction?	UPMC is in compliance with the family rating requirement. No additional load was added.
14	For each area, please provide a chart (in Excel) showing Plan ID, Product Name, Plan Name, Metal Level, Exchange Plan (Y/N), 2014 Age 21 Premium Non-Tobacco, 2015 Age 21 Premium Non-Tobacco, 2015 Percentage Change, 2016 Age 21 Premium Non-Tobacco, 2016 Percentage Change, 2017 Age 21 Premium Non-Tobacco, 2017 Percentage Change.	See 'HO IND Work for Response to Objection 05-05-16'.
15	Regarding the Geographic Areas: a. Please provide the Projected Member Months by geographic rating area. b. Changing all of the geographic rating area factors to 1.000 has caused some significant premium changes, particularly in Area 6. Please expand on your rationale for doing this, as the overall level of experience used for the Credibility Manual appears to be very credible. c. Please describe the methodology used to determine the geographic area rating factors for calendar year 2016.	a. See 'HO IND Work for Response to Objection 05-05-16'. b. We believe the differences in cost between network factors are the driving force behind cost differentials at the plan level. Therefore, we decided to vary our network factors and keep all rating area factors identical for 2017. c. Due to limited enrollment in the Experience Period during 2016 ACA pricing, we did not have credible data to use for calculating cost variations by geographic rating area. Therefore, we used data from competitor rate filings to generate rates for each plan in each geographic rating area.
16	The term "Community Rated Plans" is used in the Actuarial Memorandum. Please define how the Company is using this phrase. Is it referring to ACA plans or to the providing of insurance to all members for the same premium, regardless of age, health status, tobacco usage, etc.?	It is referring to ACA plans.

Question 3

2015 Profit Dollars	2015 Premium	2015 Profit	Trend	Morbidity Factor	Other Factor	2017 Profit before 2016 & 2017 Rate Changes	2017 Rate Increase	2015-2016 Premium Difference	2017 Profit
\$ (26,622,664)	\$ 192,348,466	-13.8%	7.8%	-3.0%	0.0%	-18.6%	16.2%	1.3%	-1.13%

Question 5

2015 Total Received Risk Adjustment from Optum	2015 Member Months	2017 Projected Member Months	2015 Received Risk Adjustment PMPM	2017 Received Risk Adjustment PMPM	2017 Risk Adjustment Admin Fee PMPM	2017 Projected Received Net Risk Adjustment PMPM
\$ 11,384,872.18	629,957	1,434,648	\$ 18.07	\$ 7.94	\$ 0.13	\$ 7.81

*Claims Data Range 01/01/2015 - 12/31/2015, Paid Through 03/31/2016

Question 8

Average Age	Adjusted Age Factors	Member Months
42	1.714	29684
44	1.822	41216
44	1.822	3511
40	1.616	200873
40	1.642	154878
41	1.670	164864
46	1.876	33425
40	1.633	1040

Final Age Factor used: **1.670**

Question 9

Total: **1,434,564**

Network	Metal Level	Feb 2016 Member Months	Portion of Enrollment within Market	Portion of Enrollment within Metal Level for Individual Market	New Sales to add	Projected Enrollment	Number of SCIDs within this Network & Metal Level Combo	2017 Individual Health Options SCID	Network	Metal Level	Projected Enrollment	Projected Member Months
Premium	Catastrophic	148	0.13%	0.49%	18	166	1	16322PA0040006	Premium	Silver	7,254	87,048
Premium	Bronze	1,838	1.63%	5.86%	220	2,058	1	16322PA0040007	Premium	Silver	7,254	87,048
Premium	Silver	33,779	29.95%	66.40%	2,490	36,269	5	16322PA0040008	Premium	Silver	7,254	87,048
Premium	Gold	15,549	13.78%	26.20%	982	16,531	1	16322PA0040010	Premium	Gold	16,531	198,372
Premium	Platinum	698	0.62%	1.05%	39	737	1	16322PA0040012	Premium	Platinum	737	8,844
Select	Catastrophic	115	0.10%	0.49%	7	122	1	16322PA0040024	Premium	Bronze	2,058	24,696
Select	Bronze	1,550	1.37%	5.86%	88	1,638	1	16322PA0040025	Premium	Silver	7,254	87,048
Select	Silver	17,454	15.47%	66.40%	996	18,450	5	16322PA0040026	Premium	Catastrophic	166	1,992
Select	Gold	6,704	5.94%	26.20%	393	7,097	1	16322PA0040027	Premium	Silver	7,254	87,048
Select	Platinum	221	0.20%	1.05%	16	237	1	16322PA0050029	Select	Silver	3,690	44,280
Partner	Catastrophic	291	0.26%	0.49%	7	298	1	16322PA0050030	Select	Silver	3,690	44,280
Partner	Bronze	3,218	2.85%	5.86%	88	3,306	1	16322PA0050031	Select	Silver	3,690	44,280
Partner	Silver	23,672	20.99%	66.40%	996	24,668	5	16322PA0050033	Select	Gold	7,097	85,164
Partner	Gold	7,297	6.47%	26.20%	393	7,690	1	16322PA0050035	Select	Platinum	237	2,844
Partner	Platinum	261	0.23%	1.05%	16	277	1	16322PA0050100	Partner	Bronze	3,306	39,672
Standard	Catastrophic	0	0.00%	0.49%	0	0	0	16322PA0050101	Select	Bronze	1,638	19,656
Standard	Bronze	7	0.01%	5.86%	0	7	1	16322PA0050102	Partner	Silver	4,934	59,208
Standard	Silver	0	0.00%	66.40%	0	0	0	16322PA0050103	Partner	Silver	4,934	59,208
Standard	Gold	0	0.00%	26.20%	0	0	0	16322PA0050104	Partner	Silver	4,934	59,208
Standard	Platinum	0	0.00%	1.05%	0	0	0	16322PA0050105	Partner	Silver	4,934	59,208
								16322PA0050106	Partner	Gold	7,690	92,280
								16322PA0050107	Partner	Platinum	277	3,324
								16322PA0050108	Select	Silver	3,690	44,280
								16322PA0050111	Partner	Catastrophic	298	3,576
								16322PA0050112	Select	Catastrophic	122	1,464
								16322PA0050113	Select	Silver	3,690	44,280
								16322PA0050114	Partner	Silver	4,934	59,208

Question 14

Geographic Area 1				
Plan ID	Metal Level	Product Name	Plan Name	Exchange Plan (Y/N)
16322PA0040006	Silver	Individual PPO	UPMC Advantage Silver \$0/\$50 - Premium Network	Y
16322PA0040007	Silver	Individual PPO	UPMC Advantage Silver \$1,750/\$30 - Premium Network	Y
16322PA0040008	Silver	Individual PPO	UPMC Advantage Silver \$3,250/\$10 - Premium Network	Y
16322PA0040010	Gold	Individual PPO	UPMC Advantage Gold \$750/\$10 - Premium Network	Y
16322PA0040012	Platinum	Individual PPO	UPMC Advantage Platinum \$250/\$20 - Premium Network	Y
16322PA0040024	Bronze	Individual PPO	UPMC Advantage Bronze \$6,950/\$35 – Premium Network	Y
16322PA0040025	Silver	Individual PPO	UPMC Advantage Silver HSA \$2,600/20% - Premium Network	Y
16322PA0040026	Catastrophic	Individual PPO	UPMC Advantage Catastrophic \$7,150/\$0 - Premium Network	Y
16322PA0040027	Silver	Individual PPO	UPMC Advantage Silver \$3,500/\$30 - Premium Network	Y
16322PA0050029	Silver	Individual EPO	UPMC Advantage Silver \$0/\$50 - Select Network	Y
16322PA0050030	Silver	Individual EPO	UPMC Advantage Silver \$1,750/\$30 - Select Network	Y
16322PA0050031	Silver	Individual EPO	UPMC Advantage Silver \$3,250/\$10 - Select Network	Y
16322PA0050033	Gold	Individual EPO	UPMC Advantage Gold \$750/\$10 - Select Network	Y
16322PA0050035	Platinum	Individual EPO	UPMC Advantage Platinum \$250/\$20 - Select Network	Y
16322PA0050100	Bronze	Individual EPO	UPMC Advantage Bronze \$6,950/\$35 – Partner Network	Y
16322PA0050101	Bronze	Individual EPO	UPMC Advantage Bronze \$6,950/\$35 – Select Network	Y
16322PA0050102	Silver	Individual EPO	UPMC Advantage Silver \$0/\$50 - Partner Network	Y
16322PA0050103	Silver	Individual EPO	UPMC Advantage Silver \$1,750/\$30 - Partner Network	Y
16322PA0050104	Silver	Individual EPO	UPMC Advantage Silver \$3,250/\$10 - Partner Network	Y
16322PA0050105	Silver	Individual EPO	UPMC Advantage Silver HSA \$2,600/20% - Partner Network	Y
16322PA0050106	Gold	Individual EPO	UPMC Advantage Gold \$750/\$10 - Partner Network	Y
16322PA0050107	Platinum	Individual EPO	UPMC Advantage Platinum \$250/\$20 - Partner Network	Y
16322PA0050108	Silver	Individual EPO	UPMC Advantage Silver HSA \$2,600/20% - Select Network	Y
16322PA0050111	Catastrophic	Individual EPO	UPMC Advantage Catastrophic \$7,150/\$0 - Partner Network	Y
16322PA0050112	Catastrophic	Individual EPO	UPMC Advantage Catastrophic \$7,150/\$0 – Select Network	Y
16322PA0050113	Silver	Individual EPO	UPMC Advantage Silver \$3,500/\$30 - Select Network	Y
16322PA0050114	Silver	Individual EPO	UPMC Advantage Silver \$3,500/\$30 - Partner Network	Y

2014	2015	2015	2016	2016	2017	2017
Age 21, NT Prem	Age 21, NT Prem	% Change	Age 21, NT Prem	% Change	Age 21, NT Prem	% Change
\$ -	\$ 163.67	N/A	\$ 181.02	10.6%	\$ 214.59	18.5%
\$ -	\$ 161.39	N/A	\$ 180.36	11.8%	\$ 213.81	18.5%
\$ -	\$ 163.44	N/A	\$ 177.44	8.6%	\$ 210.35	18.5%
\$ -	\$ 207.42	N/A	\$ 223.92	8.0%	\$ 265.44	18.5%
\$ -	\$ 345.15	N/A	\$ 380.01	10.1%	\$ 450.48	18.5%
\$ -	\$ -	N/A	\$ 158.03	N/A	\$ 187.34	18.5%
\$ -	\$ -	N/A	\$ 180.69	N/A	\$ 214.20	18.5%
\$ -	\$ -	N/A	\$ 137.48	N/A	\$ 162.98	18.5%
\$ -	\$ -	N/A	\$ -	N/A	\$ 207.71	N/A
\$ -	\$ 142.32	N/A	\$ 157.40	10.6%	\$ 178.85	13.6%
\$ -	\$ 140.34	N/A	\$ 156.84	11.8%	\$ 178.20	13.6%
\$ -	\$ 142.12	N/A	\$ 154.30	8.6%	\$ 175.32	13.6%
\$ -	\$ 177.89	N/A	\$ 194.71	9.5%	\$ 221.23	13.6%
\$ -	\$ 300.13	N/A	\$ 330.44	10.1%	\$ 375.45	13.6%
\$ -	\$ -	N/A	\$ 130.55	N/A	\$ 148.43	13.7%
\$ -	\$ -	N/A	\$ 137.42	N/A	\$ 156.14	13.6%
\$ -	\$ -	N/A	\$ 149.53	N/A	\$ 170.02	13.7%
\$ -	\$ -	N/A	\$ 148.99	N/A	\$ 169.40	13.7%
\$ -	\$ -	N/A	\$ 146.58	N/A	\$ 166.66	13.7%
\$ -	\$ -	N/A	\$ 149.26	N/A	\$ 169.71	13.7%
\$ -	\$ -	N/A	\$ 184.97	N/A	\$ 210.31	13.7%
\$ -	\$ -	N/A	\$ 313.92	N/A	\$ 356.91	13.7%
\$ -	\$ -	N/A	\$ 157.12	N/A	\$ 178.52	13.6%
\$ -	\$ -	N/A	\$ 113.57	N/A	\$ 129.13	13.7%
\$ -	\$ -	N/A	\$ 119.55	N/A	\$ 135.84	13.6%
\$ -	\$ -	N/A	\$ -	N/A	\$ 173.12	N/A
\$ -	\$ -	N/A	\$ -	N/A	\$ 173.12	N/A

Plan ID	Metal Level	Product Name
16322PA0040006	Silver	Individual PPO
16322PA0040007	Silver	Individual PPO
16322PA0040008	Silver	Individual PPO
16322PA0040010	Gold	Individual PPO
16322PA0040012	Platinum	Individual PPO
16322PA0040024	Bronze	Individual PPO
16322PA0040025	Silver	Individual PPO
16322PA0040026	Catastrophic	Individual PPO
16322PA0040027	Silver	Individual PPO
16322PA0050029	Silver	Individual EPO
16322PA0050030	Silver	Individual EPO
16322PA0050031	Silver	Individual EPO
16322PA0050033	Gold	Individual EPO
16322PA0050035	Platinum	Individual EPO
16322PA0050100	Bronze	Individual EPO
16322PA0050101	Bronze	Individual EPO
16322PA0050102	Silver	Individual EPO
16322PA0050103	Silver	Individual EPO
16322PA0050104	Silver	Individual EPO
16322PA0050105	Silver	Individual EPO
16322PA0050106	Gold	Individual EPO
16322PA0050107	Platinum	Individual EPO
16322PA0050108	Silver	Individual EPO
16322PA0050111	Catastrophic	Individual EPO
16322PA0050112	Catastrophic	Individual EPO
16322PA0050113	Silver	Individual EPO
16322PA0050114	Silver	Individual EPO

Geographic Area 2		2014	2015	2015	2016	2016
Plan Name	Exchange Plan (Y/N)	Age 21, NT Prem	Age 21, NT Prem	% Change	Age 21, NT Prem	% Change
UPMC Advantage Silver \$0/\$50 - Premium Network	Y	\$ -	\$ 181.22	N/A	\$ 199.66	10.2%
UPMC Advantage Silver \$1,750/\$30 - Premium Network	Y	\$ -	\$ 178.70	N/A	\$ 198.94	11.3%
UPMC Advantage Silver \$3,250/\$10 - Premium Network	Y	\$ -	\$ 180.96	N/A	\$ 195.72	8.2%
UPMC Advantage Gold \$750/\$10 - Premium Network	Y	\$ -	\$ 217.16	N/A	\$ 233.71	7.6%
UPMC Advantage Platinum \$250/\$20 - Premium Network	Y	\$ -	\$ 345.15	N/A	\$ 380.01	10.1%
UPMC Advantage Bronze \$6,950/\$35 – Premium Network	Y	\$ -	\$ -	N/A	\$ 175.89	N/A
UPMC Advantage Silver HSA \$2,600/20% - Premium Network	Y	\$ -	\$ -	N/A	\$ 199.30	N/A
UPMC Advantage Catastrophic \$7,150/\$0 - Premium Network	Y	\$ -	\$ -	N/A	\$ 153.03	N/A
UPMC Advantage Silver \$3,500/\$30 - Premium Network	Y	\$ -	\$ -	N/A	\$ -	N/A
UPMC Advantage Silver \$0/\$50 - Select Network	Y	\$ -	\$ 157.58	N/A	\$ 173.62	10.2%
UPMC Advantage Silver \$1,750/\$30 - Select Network	Y	\$ -	\$ 155.39	N/A	\$ 172.99	11.3%
UPMC Advantage Silver \$3,250/\$10 - Select Network	Y	\$ -	\$ 157.36	N/A	\$ 170.19	8.2%
UPMC Advantage Gold \$750/\$10 - Select Network	Y	\$ -	\$ 186.24	N/A	\$ 203.22	9.1%
UPMC Advantage Platinum \$250/\$20 - Select Network	Y	\$ -	\$ 300.13	N/A	\$ 330.44	10.1%
UPMC Advantage Bronze \$6,950/\$35 – Partner Network	Y	\$ -	\$ -	N/A	\$ 145.30	N/A
UPMC Advantage Bronze \$6,950/\$35 – Select Network	Y	\$ -	\$ -	N/A	\$ 152.95	N/A
UPMC Advantage Silver \$0/\$50 - Partner Network	Y	\$ -	\$ -	N/A	\$ 164.94	N/A
UPMC Advantage Silver \$1,750/\$30 - Partner Network	Y	\$ -	\$ -	N/A	\$ 164.34	N/A
UPMC Advantage Silver \$3,250/\$10 - Partner Network	Y	\$ -	\$ -	N/A	\$ 161.68	N/A
UPMC Advantage Silver HSA \$2,600/20% - Partner Network	Y	\$ -	\$ -	N/A	\$ 164.64	N/A
UPMC Advantage Gold \$750/\$10 - Partner Network	Y	\$ -	\$ -	N/A	\$ 193.06	N/A
UPMC Advantage Platinum \$250/\$20 - Partner Network	Y	\$ -	\$ -	N/A	\$ 313.92	N/A
UPMC Advantage Silver HSA \$2,600/20% - Select Network	Y	\$ -	\$ -	N/A	\$ 173.31	N/A
UPMC Advantage Catastrophic \$7,150/\$0 - Partner Network	Y	\$ -	\$ -	N/A	\$ 126.41	N/A
UPMC Advantage Catastrophic \$7,150/\$0 – Select Network	Y	\$ -	\$ -	N/A	\$ 133.07	N/A
UPMC Advantage Silver \$3,500/\$30 - Select Network	Y	\$ -	\$ -	N/A	\$ -	N/A
UPMC Advantage Silver \$3,500/\$30 - Partner Network	Y	\$ -	\$ -	N/A	\$ -	N/A

2017	2017
Age 21, NT Prem	% Change
\$ 214.59	7.5%
\$ 213.81	7.5%
\$ 210.35	7.5%
\$ 265.44	13.6%
\$ 450.48	18.5%
\$ 187.34	6.5%
\$ 214.20	7.5%
\$ 162.98	6.5%
\$ 207.71	N/A
\$ 178.85	3.0%
\$ 178.20	3.0%
\$ 175.32	3.0%
\$ 221.23	8.9%
\$ 375.45	13.6%
\$ 148.43	2.2%
\$ 156.14	2.1%
\$ 170.02	3.1%
\$ 169.40	3.1%
\$ 166.66	3.1%
\$ 169.71	3.1%
\$ 210.31	8.9%
\$ 356.91	13.7%
\$ 178.52	3.0%
\$ 129.13	2.2%
\$ 135.84	2.1%
\$ 173.12	N/A
\$ 173.12	N/A

Plan ID	Metal Level	Product Name
16322PA0040006	Silver	Individual PPO
16322PA0040007	Silver	Individual PPO
16322PA0040008	Silver	Individual PPO
16322PA0040010	Gold	Individual PPO
16322PA0040012	Platinum	Individual PPO
16322PA0040024	Bronze	Individual PPO
16322PA0040025	Silver	Individual PPO
16322PA0040026	Catastrophic	Individual PPO
16322PA0040027	Silver	Individual PPO
16322PA0050029	Silver	Individual EPO
16322PA0050030	Silver	Individual EPO
16322PA0050031	Silver	Individual EPO
16322PA0050033	Gold	Individual EPO
16322PA0050035	Platinum	Individual EPO
16322PA0050100	Bronze	Individual EPO
16322PA0050101	Bronze	Individual EPO
16322PA0050102	Silver	Individual EPO
16322PA0050103	Silver	Individual EPO
16322PA0050104	Silver	Individual EPO
16322PA0050105	Silver	Individual EPO
16322PA0050106	Gold	Individual EPO
16322PA0050107	Platinum	Individual EPO
16322PA0050108	Silver	Individual EPO
16322PA0050111	Catastrophic	Individual EPO
16322PA0050112	Catastrophic	Individual EPO
16322PA0050113	Silver	Individual EPO
16322PA0050114	Silver	Individual EPO

Geographic Area 4		2014	2015	2015	2016	2016
Plan Name	Exchange Plan (Y/N)	Age 21, NT Prem	Age 21, NT Prem	% Change	Age 21, NT Prem	% Change
UPMC Advantage Silver \$0/\$50 - Premium Network	Y	\$ -	\$ 163.67	N/A	\$ 181.02	10.6%
UPMC Advantage Silver \$1,750/\$30 - Premium Network	Y	\$ -	\$ 161.39	N/A	\$ 180.36	11.8%
UPMC Advantage Silver \$3,250/\$10 - Premium Network	Y	\$ -	\$ 163.44	N/A	\$ 177.44	8.6%
UPMC Advantage Gold \$750/\$10 - Premium Network	Y	\$ -	\$ 207.42	N/A	\$ 223.92	8.0%
UPMC Advantage Platinum \$250/\$20 - Premium Network	Y	\$ -	\$ 345.15	N/A	\$ 380.01	10.1%
UPMC Advantage Bronze \$6,950/\$35 – Premium Network	Y	\$ -	\$ -	N/A	\$ 158.03	N/A
UPMC Advantage Silver HSA \$2,600/20% - Premium Network	Y	\$ -	\$ -	N/A	\$ 180.69	N/A
UPMC Advantage Catastrophic \$7,150/\$0 - Premium Network	Y	\$ -	\$ -	N/A	\$ 137.48	N/A
UPMC Advantage Silver \$3,500/\$30 - Premium Network	Y	\$ -	\$ -	N/A	\$ -	N/A
UPMC Advantage Silver \$0/\$50 - Select Network	Y	\$ -	\$ 142.32	N/A	\$ 157.40	10.6%
UPMC Advantage Silver \$1,750/\$30 - Select Network	Y	\$ -	\$ 140.34	N/A	\$ 156.84	11.8%
UPMC Advantage Silver \$3,250/\$10 - Select Network	Y	\$ -	\$ 142.12	N/A	\$ 154.30	8.6%
UPMC Advantage Gold \$750/\$10 - Select Network	Y	\$ -	\$ 177.89	N/A	\$ 194.71	9.5%
UPMC Advantage Platinum \$250/\$20 - Select Network	Y	\$ -	\$ 300.13	N/A	\$ 330.44	10.1%
UPMC Advantage Bronze \$6,950/\$35 – Partner Network	Y	\$ -	\$ -	N/A	\$ 130.55	N/A
UPMC Advantage Bronze \$6,950/\$35 – Select Network	Y	\$ -	\$ -	N/A	\$ 137.42	N/A
UPMC Advantage Silver \$0/\$50 - Partner Network	Y	\$ -	\$ -	N/A	\$ 149.53	N/A
UPMC Advantage Silver \$1,750/\$30 - Partner Network	Y	\$ -	\$ -	N/A	\$ 148.99	N/A
UPMC Advantage Silver \$3,250/\$10 - Partner Network	Y	\$ -	\$ -	N/A	\$ 146.58	N/A
UPMC Advantage Silver HSA \$2,600/20% - Partner Network	Y	\$ -	\$ -	N/A	\$ 149.26	N/A
UPMC Advantage Gold \$750/\$10 - Partner Network	Y	\$ -	\$ -	N/A	\$ 184.97	N/A
UPMC Advantage Platinum \$250/\$20 - Partner Network	Y	\$ -	\$ -	N/A	\$ 313.92	N/A
UPMC Advantage Silver HSA \$2,600/20% - Select Network	Y	\$ -	\$ -	N/A	\$ 157.12	N/A
UPMC Advantage Catastrophic \$7,150/\$0 - Partner Network	Y	\$ -	\$ -	N/A	\$ 113.57	N/A
UPMC Advantage Catastrophic \$7,150/\$0 – Select Network	Y	\$ -	\$ -	N/A	\$ 119.55	N/A
UPMC Advantage Silver \$3,500/\$30 - Select Network	Y	\$ -	\$ -	N/A	\$ -	N/A
UPMC Advantage Silver \$3,500/\$30 - Partner Network	Y	\$ -	\$ -	N/A	\$ -	N/A

2017	2017
Age 21, NT Prem	% Change
\$ 214.59	18.5%
\$ 213.81	18.5%
\$ 210.35	18.5%
\$ 265.44	18.5%
\$ 450.48	18.5%
\$ 187.34	18.5%
\$ 214.20	18.5%
\$ 162.98	18.5%
\$ 207.71	N/A
\$ 178.85	13.6%
\$ 178.20	13.6%
\$ 175.32	13.6%
\$ 221.23	13.6%
\$ 375.45	13.6%
\$ 148.43	13.7%
\$ 156.14	13.6%
\$ 170.02	13.7%
\$ 169.40	13.7%
\$ 166.66	13.7%
\$ 169.71	13.7%
\$ 210.31	13.7%
\$ 356.91	13.7%
\$ 178.52	13.6%
\$ 129.13	13.7%
\$ 135.84	13.6%
\$ 173.12	N/A
\$ 173.12	N/A

Plan ID	Metal Level	Product Name
16322PA0040006	Silver	Individual PPO
16322PA0040007	Silver	Individual PPO
16322PA0040008	Silver	Individual PPO
16322PA0040010	Gold	Individual PPO
16322PA0040012	Platinum	Individual PPO
16322PA0040024	Bronze	Individual PPO
16322PA0040025	Silver	Individual PPO
16322PA0040026	Catastrophic	Individual PPO
16322PA0040027	Silver	Individual PPO
16322PA0050029	Silver	Individual EPO
16322PA0050030	Silver	Individual EPO
16322PA0050031	Silver	Individual EPO
16322PA0050033	Gold	Individual EPO
16322PA0050035	Platinum	Individual EPO
16322PA0050100	Bronze	Individual EPO
16322PA0050101	Bronze	Individual EPO
16322PA0050102	Silver	Individual EPO
16322PA0050103	Silver	Individual EPO
16322PA0050104	Silver	Individual EPO
16322PA0050105	Silver	Individual EPO
16322PA0050106	Gold	Individual EPO
16322PA0050107	Platinum	Individual EPO
16322PA0050108	Silver	Individual EPO
16322PA0050111	Catastrophic	Individual EPO
16322PA0050112	Catastrophic	Individual EPO
16322PA0050113	Silver	Individual EPO
16322PA0050114	Silver	Individual EPO

Geographic Area 5		2014	2015	2015	2016	2016
Plan Name	Exchange Plan (Y/N)	Age 21, NT Prem	Age 21, NT Prem	% Change	Age 21, NT Prem	% Change
UPMC Advantage Silver \$0/\$50 - Premium Network	Y	\$ -	\$ 181.22	N/A	\$ 199.66	10.2%
UPMC Advantage Silver \$1,750/\$30 - Premium Network	Y	\$ -	\$ 178.70	N/A	\$ 198.94	11.3%
UPMC Advantage Silver \$3,250/\$10 - Premium Network	Y	\$ -	\$ 180.96	N/A	\$ 195.72	8.2%
UPMC Advantage Gold \$750/\$10 - Premium Network	Y	\$ -	\$ 217.16	N/A	\$ 233.71	7.6%
UPMC Advantage Platinum \$250/\$20 - Premium Network	Y	\$ -	\$ 345.15	N/A	\$ 380.01	10.1%
UPMC Advantage Bronze \$6,950/\$35 – Premium Network	Y	\$ -	\$ -	N/A	\$ 175.89	N/A
UPMC Advantage Silver HSA \$2,600/20% - Premium Network	Y	\$ -	\$ -	N/A	\$ 199.30	N/A
UPMC Advantage Catastrophic \$7,150/\$0 - Premium Network	Y	\$ -	\$ -	N/A	\$ 153.03	N/A
UPMC Advantage Silver \$3,500/\$30 - Premium Network	Y	\$ -	\$ -	N/A	\$ -	N/A
UPMC Advantage Silver \$0/\$50 - Select Network	Y	\$ -	\$ 157.58	N/A	\$ 173.62	10.2%
UPMC Advantage Silver \$1,750/\$30 - Select Network	Y	\$ -	\$ 155.39	N/A	\$ 172.99	11.3%
UPMC Advantage Silver \$3,250/\$10 - Select Network	Y	\$ -	\$ 157.36	N/A	\$ 170.19	8.2%
UPMC Advantage Gold \$750/\$10 - Select Network	Y	\$ -	\$ 186.24	N/A	\$ 203.22	9.1%
UPMC Advantage Platinum \$250/\$20 - Select Network	Y	\$ -	\$ 300.13	N/A	\$ 330.44	10.1%
UPMC Advantage Bronze \$6,950/\$35 – Partner Network	Y	\$ -	\$ -	N/A	\$ 145.30	N/A
UPMC Advantage Bronze \$6,950/\$35 – Select Network	Y	\$ -	\$ -	N/A	\$ 152.95	N/A
UPMC Advantage Silver \$0/\$50 - Partner Network	Y	\$ -	\$ -	N/A	\$ 164.94	N/A
UPMC Advantage Silver \$1,750/\$30 - Partner Network	Y	\$ -	\$ -	N/A	\$ 164.34	N/A
UPMC Advantage Silver \$3,250/\$10 - Partner Network	Y	\$ -	\$ -	N/A	\$ 161.68	N/A
UPMC Advantage Silver HSA \$2,600/20% - Partner Network	Y	\$ -	\$ -	N/A	\$ 164.64	N/A
UPMC Advantage Gold \$750/\$10 - Partner Network	Y	\$ -	\$ -	N/A	\$ 193.06	N/A
UPMC Advantage Platinum \$250/\$20 - Partner Network	Y	\$ -	\$ -	N/A	\$ 313.92	N/A
UPMC Advantage Silver HSA \$2,600/20% - Select Network	Y	\$ -	\$ -	N/A	\$ 173.31	N/A
UPMC Advantage Catastrophic \$7,150/\$0 - Partner Network	Y	\$ -	\$ -	N/A	\$ 126.41	N/A
UPMC Advantage Catastrophic \$7,150/\$0 – Select Network	Y	\$ -	\$ -	N/A	\$ 133.07	N/A
UPMC Advantage Silver \$3,500/\$30 - Select Network	Y	\$ -	\$ -	N/A	\$ -	N/A
UPMC Advantage Silver \$3,500/\$30 - Partner Network	Y	\$ -	\$ -	N/A	\$ -	N/A

2017	2017
Age 21, NT Prem	% Change
\$ 214.59	7.5%
\$ 213.81	7.5%
\$ 210.35	7.5%
\$ 265.44	13.6%
\$ 450.48	18.5%
\$ 187.34	6.5%
\$ 214.20	7.5%
\$ 162.98	6.5%
\$ 207.71	N/A
\$ 178.85	3.0%
\$ 178.20	3.0%
\$ 175.32	3.0%
\$ 221.23	8.9%
\$ 375.45	13.6%
\$ 148.43	2.2%
\$ 156.14	2.1%
\$ 170.02	3.1%
\$ 169.40	3.1%
\$ 166.66	3.1%
\$ 169.71	3.1%
\$ 210.31	8.9%
\$ 356.91	13.7%
\$ 178.52	3.0%
\$ 129.13	2.2%
\$ 135.84	2.1%
\$ 173.12	N/A
\$ 173.12	N/A

Plan ID	Metal Level	Product Name
16322PA0040006	Silver	Individual PPO
16322PA0040007	Silver	Individual PPO
16322PA0040008	Silver	Individual PPO
16322PA0040010	Gold	Individual PPO
16322PA0040012	Platinum	Individual PPO
16322PA0040024	Bronze	Individual PPO
16322PA0040025	Silver	Individual PPO
16322PA0040026	Catastrophic	Individual PPO
16322PA0040027	Silver	Individual PPO
16322PA0050029	Silver	Individual EPO
16322PA0050030	Silver	Individual EPO
16322PA0050031	Silver	Individual EPO
16322PA0050033	Gold	Individual EPO
16322PA0050035	Platinum	Individual EPO
16322PA0050100	Bronze	Individual EPO
16322PA0050101	Bronze	Individual EPO
16322PA0050102	Silver	Individual EPO
16322PA0050103	Silver	Individual EPO
16322PA0050104	Silver	Individual EPO
16322PA0050105	Silver	Individual EPO
16322PA0050106	Gold	Individual EPO
16322PA0050107	Platinum	Individual EPO
16322PA0050108	Silver	Individual EPO
16322PA0050111	Catastrophic	Individual EPO
16322PA0050112	Catastrophic	Individual EPO
16322PA0050113	Silver	Individual EPO
16322PA0050114	Silver	Individual EPO

Geographic Area 6		2014	2015	2015	2016	2016
Plan Name	Exchange Plan (Y/N)	Age 21, NT Prem	Age 21, NT Prem	% Change	Age 21, NT Prem	% Change
UPMC Advantage Silver \$0/\$50 - Premium Network	Y	\$ -	\$ 194.29	N/A	\$ 214.07	10.2%
UPMC Advantage Silver \$1,750/\$30 - Premium Network	Y	\$ -	\$ 191.59	N/A	\$ 213.30	11.3%
UPMC Advantage Silver \$3,250/\$10 - Premium Network	Y	\$ -	\$ 194.02	N/A	\$ 209.85	8.2%
UPMC Advantage Gold \$750/\$10 - Premium Network	Y	\$ -	\$ 232.82	N/A	\$ 250.58	7.6%
UPMC Advantage Platinum \$250/\$20 - Premium Network	Y	\$ -	\$ 370.06	N/A	\$ 407.44	10.1%
UPMC Advantage Bronze \$6,950/\$35 – Premium Network	Y	\$ -	\$ -	N/A	\$ 188.58	N/A
UPMC Advantage Silver HSA \$2,600/20% - Premium Network	Y	\$ -	\$ -	N/A	\$ 213.69	N/A
UPMC Advantage Catastrophic \$7,150/\$0 - Premium Network	Y	\$ -	\$ -	N/A	\$ 164.06	N/A
UPMC Advantage Silver \$3,500/\$30 - Premium Network	Y	\$ -	\$ -	N/A	\$ -	N/A
UPMC Advantage Silver \$0/\$50 - Select Network	Y	\$ -	\$ 168.95	N/A	\$ 186.15	10.2%
UPMC Advantage Silver \$1,750/\$30 - Select Network	Y	\$ -	\$ 166.60	N/A	\$ 185.48	11.3%
UPMC Advantage Silver \$3,250/\$10 - Select Network	Y	\$ -	\$ 168.71	N/A	\$ 182.48	8.2%
UPMC Advantage Gold \$750/\$10 - Select Network	Y	\$ -	\$ 199.68	N/A	\$ 217.90	9.1%
UPMC Advantage Platinum \$250/\$20 - Select Network	Y	\$ -	\$ 321.79	N/A	\$ 354.29	10.1%
UPMC Advantage Bronze \$6,950/\$35 – Partner Network	Y	\$ -	\$ -	N/A	\$ 155.78	N/A
UPMC Advantage Bronze \$6,950/\$35 – Select Network	Y	\$ -	\$ -	N/A	\$ 163.98	N/A
UPMC Advantage Silver \$0/\$50 - Partner Network	Y	\$ -	\$ -	N/A	\$ 176.84	N/A
UPMC Advantage Silver \$1,750/\$30 - Partner Network	Y	\$ -	\$ -	N/A	\$ 176.21	N/A
UPMC Advantage Silver \$3,250/\$10 - Partner Network	Y	\$ -	\$ -	N/A	\$ 173.36	N/A
UPMC Advantage Silver HSA \$2,600/20% - Partner Network	Y	\$ -	\$ -	N/A	\$ 176.52	N/A
UPMC Advantage Gold \$750/\$10 - Partner Network	Y	\$ -	\$ -	N/A	\$ 207.00	N/A
UPMC Advantage Platinum \$250/\$20 - Partner Network	Y	\$ -	\$ -	N/A	\$ 336.58	N/A
UPMC Advantage Silver HSA \$2,600/20% - Select Network	Y	\$ -	\$ -	N/A	\$ 185.82	N/A
UPMC Advantage Catastrophic \$7,150/\$0 - Partner Network	Y	\$ -	\$ -	N/A	\$ 135.53	N/A
UPMC Advantage Catastrophic \$7,150/\$0 – Select Network	Y	\$ -	\$ -	N/A	\$ 142.66	N/A
UPMC Advantage Silver \$3,500/\$30 - Select Network	Y	\$ -	\$ -	N/A	\$ -	N/A
UPMC Advantage Silver \$3,500/\$30 - Partner Network	Y	\$ -	\$ -	N/A	\$ -	N/A

2017	2017
Age 21, NT Prem	% Change
\$ 214.59	0.2%
\$ 213.81	0.2%
\$ 210.35	0.2%
\$ 265.44	5.9%
\$ 450.48	10.6%
\$ 187.34	-0.7%
\$ 214.20	0.2%
\$ 162.98	-0.7%
\$ 207.71	N/A
\$ 178.85	-3.9%
\$ 178.20	-3.9%
\$ 175.32	-3.9%
\$ 221.23	1.5%
\$ 375.45	6.0%
\$ 148.43	-4.7%
\$ 156.14	-4.8%
\$ 170.02	-3.9%
\$ 169.40	-3.9%
\$ 166.66	-3.9%
\$ 169.71	-3.9%
\$ 210.31	1.6%
\$ 356.91	6.0%
\$ 178.52	-3.9%
\$ 129.13	-4.7%
\$ 135.84	-4.8%
\$ 173.12	N/A
\$ 173.12	N/A

Question 15a

2017 Individual Health Options SCID	Projected Member Months	Rating Areas Covered	Projected Member Months for Rating Area 1	Projected Member Months for Rating Area 2	Projected Member Months for Rating Area 4	Projected Member Months for Rating Area 5	Projected Member Months for Rating Area 6
16322PA0040006	87,048	1, 2, 4, 5, 6	19,483	2,452	41,774	19,652	3,687
16322PA0040007	87,048	1, 2, 4, 5, 6	22,751	2,380	41,231	19,323	1,363
16322PA0040008	87,048	1, 2, 4, 5, 6	21,455	2,181	38,168	22,233	3,012
16322PA0040010	198,372	1, 2, 4, 5, 6	29,656	4,816	127,857	34,124	1,919
16322PA0040012	8,844	1, 2, 4, 5, 6	650	38	7,404	752	0
16322PA0040024	24,696	1, 2, 4, 5, 6	6,244	737	9,776	5,687	2,253
16322PA0040025	87,048	1, 2, 4, 5, 6	20,339	1,199	50,753	12,548	2,210
16322PA0040026	1,992	1, 2, 4, 5, 6	488	84	1,100	251	70
16322PA0040027	87,048	1, 2, 4, 5, 6	12,255	1,012	62,333	10,442	1,007
16322PA0050029	44,280	4	0	0	44,280	0	0
16322PA0050030	44,280	4	0	0	44,280	0	0
16322PA0050031	44,280	4	0	0	44,280	0	0
16322PA0050033	85,164	4	0	0	85,164	0	0
16322PA0050035	2,844	4	0	0	2,844	0	0
16322PA0050100	39,672	1, 4, 5	5,278	0	32,290	2,104	0
16322PA0050101	19,656	4	0	0	19,656	0	0
16322PA0050102	59,208	1, 4, 5	6,632	0	48,192	4,384	0
16322PA0050103	59,208	1, 4, 5	10,293	0	45,359	3,556	0
16322PA0050104	59,208	1, 4, 5	7,167	0	45,886	6,155	0
16322PA0050105	59,208	1, 4, 5	8,370	0	49,608	1,230	0
16322PA0050106	92,280	1, 4, 5	11,477	0	75,919	4,884	0
16322PA0050107	3,324	1, 4, 5	145	0	2,876	303	0
16322PA0050108	44,280	4	0	0	44,280	0	0
16322PA0050111	3,576	1, 4, 5	289	0	3,081	206	0
16322PA0050112	1,464	4	0	0	1,464	0	0
16322PA0050113	44,280	4	0	0	44,280	0	0
16322PA0050114	59,208	1, 4, 5	8,533	0	43,404	7,271	0

Question	Comment/Request	Response
1	Please provide the January 1, 2016 through April 30, 2016 emerging experience in an Excel worksheet formatted similar to Table 2.	Please see 'HO IND Work for Response to Objection 06-17-16' for emerging experience data.
2	Please confirm that the PMPM Risk Adjustment User Fee used was \$0.13. Confirm that it was included in the "Projected Risk Adjustments PMPM" in Section III of Worksheet 1 and that it was not included in the "Taxes and Fees".	We can confirm that the PMPM Risk Adjustment User Fee used was \$0.13. We can also confirm that it was included in the "Projected Risk Adjustments PMPM" in Section III of Worksheet 1 and that it was not included in the "Taxes and Fees" field.
3	Please provide quantitative support, in Excel with working formulas, for the development of \$7.81, the projected Risk Adjustment using the federal formula. Please provide a detailed narrative that describes the development of the estimated risk adjustment transfer payment. In demonstrating the development of the transfer payment, please show all risk transfer formula components, the estimated market-wide average risk assumptions as well as support for those assumptions. When responding to this data call, you may redact this response as it will contain proprietary information.	Please see 'UPMC ACA Accrual Report 201505.pdf' in the Supporting Documentation tab in SERFF for details on the development of the total projected Risk Adjustment transfer payment for 2017. Please see 'HO IND Work for Response to Objection 06-17-16' for the development of the \$7.81 PMPM from the total Risk Adjustment transfer payment calculated by Optum.
4	In Tables 2 and 4, does the premium include HHS cost sharing, estimated risk adjustment or revenue generated from transitional business? If so, please provide the dollar amount of HHS cost sharing and estimated risk adjustment and the number of transitional members.	The premium does not include risk adjustment or revenue generated from transitional business but does include HHS cost sharing. Please see 'HO IND Work for Response to Objection 06-17-16' for this data.
5	In Tables 2 and 4, please provide the dollar amount of incurred and allowed claims for transitional members.	No data for transitional members was included in this filing.
6	Please indicate if the Company included an adjustment to account for the regulation that prohibits charging for more than three children per family, and, if applicable, demonstrate how the adjustment was derived and where it is included in the filing.	We did not include an adjustment for this.
7	Please discuss the impact SEP enrollees have had on your company's claims experience. If possible provide the 2015 loss ratio for SEP enrollees and non-SEP enrollees.	We do not have any indicators in our data warehouse that allow us to distinguish between SEP and non-SEP enrollees at the member level. Due to the inability to create a breakout, we look at the entire population as a whole instead of considering SEP and non-SEP enrollees separately when calculating loss ratios, but this is something that could change in the future.
8	Does your filing propose any changes in your pricing model? If so, please discuss. This response may be redacted since it may contain confidential information.	We replaced our pricing model from last year with a new one since our Experience Period data is credible enough to use for 2017 ACA pricing.

9	Please provide the actual and projected (according to the approved rate filing) general administrative expense, claims expense, agent/broker fees and commissions, and Quality Improvement Initiatives for calendar years 2014 and 2015 and the year to date 2016. If aggregate numbers were provided and approved in prior year filings, show the allocated amount of each.	Please see 'HO IND Work for Response to Objection 06-17-16' for this data.
10	Regarding broker commissions: a) Under what circumstances and in what geographic locations will commissions be paid? b) Are commissions paid for Special Enrollment Periods? c) Provide a copy of the broker agreement – current and 2017. d) Show the calculation of the average commission – current and 2017. When responding to this question, you may provide a redacted version of the response as it contains proprietary information.	[This response redacted for publication.]
11	Please be advised that each time the URRT is changed in SERFF, the URRT in HIOS must also be updated. Please acknowledge your understanding and certify that you are in compliance	The updated URRT has been uploaded into HIOS.

Question 1

[illegible]

Question 3

2015 Total Received Risk Adjustment from Optum	2015 Member Months	2017 Projected Member Months	2015 Received Risk Adjustment PMPM	2017 Received Risk Adjustment PMPM	2017 Risk Adjustment Admin Fee PMPM	2017 Projected Received Net Risk Adjustment PMPM
\$ 11,384,872.18	629,957	1,434,648	\$ 18.07	\$ 7.94	\$ 0.13	\$ 7.81

Question 4

Table 2 - Total Premium	Table 2 - HHS cost-sharing	Table 2 - Revenue from Transitional Business	Table 2 - Total Member Months	Table 2 - Transitional Member Months
\$ 180,963,593.78	\$ 10,809,642.00	\$ -	629,802	0

Table 4 - Year	Table 4 - Total Premium	Table 4 - HHS cost-sharing	Table 4 - Revenue from Transitional Business	Table 4 - Total Member Months	Table 4 - Transitional Member Months
2013	\$ -	\$ -	\$ -	0	0
2014	\$ 52,418.26	\$ -	\$ -	99	0
2015	\$ 180,963,593.78	\$ 10,809,642.00	\$ -	629,802	0

Question 9

Year	Projected General and Claims	Projected Agent/Broker Fees and Commissions	Projected Quality Improvement Initiatives	Actual General and Claims	Actual Agent/Broker Fees and Commissions	Actual Quality Improvement Initiatives
2014	6.9%	2.1%	0.0%	3.9%	1.2%	0.0%
2015	6.6%	1.9%	0.5%	9.3%	2.6%	0.7%
2016	6.4%	2.4%	0.2%	9.0%	3.3%	0.3%

Question 1a & 1d

Plan ID (1)	Metal Level (2)	Projected Membership (3)	Projected Allowed Claims (4)	Projected Paid Claims (5)	Company Determined AV Factor (6)	Induced Utilization (7)	AV & Cost Sharing (6)*(7) = (8)	Proof of Normalization of (7) using (3)
16322PA0040006	Silver	87,048	\$ 39,967,354	\$ 28,756,511	0.720	0.964	0.694	1.000
16322PA0040007	Silver	87,048	\$ 40,073,621	\$ 28,652,639	0.715	0.967	0.691	
16322PA0040008	Silver	87,048	\$ 39,408,935	\$ 28,189,211	0.715	0.951	0.680	
16322PA0040010	Gold	198,372	\$ 99,233,584	\$ 81,063,915	0.817	1.051	0.858	
16322PA0040012	Platinum	8,844	\$ 6,827,807	\$ 6,133,419	0.898	1.621	1.456	
16322PA0040024	Bronze	24,696	\$ 11,592,614	\$ 7,122,502	0.614	0.986	0.606	
16322PA0040025	Silver	87,048	\$ 39,961,819	\$ 28,704,575	0.718	0.964	0.693	
16322PA0040026	Catastrophic	1,992	\$ 817,066	\$ 499,799	0.612	0.861	0.527	
16322PA0040027	Silver	87,048	\$ 39,409,189	\$ 27,834,710	0.706	0.951	0.672	
16322PA0050029	Silver	44,280	\$ 16,944,788	\$ 12,191,775	0.720	0.975	0.702	
16322PA0050030	Silver	44,280	\$ 16,989,842	\$ 12,147,737	0.715	0.978	0.699	
16322PA0050031	Silver	44,280	\$ 16,708,038	\$ 11,951,259	0.715	0.961	0.688	
16322PA0050033	Gold	85,164	\$ 35,507,189	\$ 29,005,823	0.817	1.062	0.868	
16322PA0050035	Platinum	2,844	\$ 1,829,970	\$ 1,643,862	0.898	1.639	1.473	
16322PA0050100	Bronze	39,672	\$ 14,754,465	\$ 9,065,144	0.614	0.999	0.614	
16322PA0050101	Bronze	19,656	\$ 7,690,098	\$ 4,724,796	0.614	0.997	0.612	
16322PA0050102	Silver	59,208	\$ 21,538,309	\$ 15,496,813	0.720	0.978	0.703	
16322PA0050103	Silver	59,208	\$ 21,595,576	\$ 15,440,837	0.715	0.980	0.701	
16322PA0050104	Silver	59,208	\$ 21,237,378	\$ 15,191,097	0.715	0.964	0.689	
16322PA0050105	Silver	59,208	\$ 21,535,326	\$ 15,468,825	0.718	0.977	0.702	
16322PA0050106	Gold	92,280	\$ 36,573,835	\$ 29,877,166	0.817	1.065	0.870	
16322PA0050107	Platinum	3,324	\$ 2,033,191	\$ 1,826,415	0.898	1.644	1.477	
16322PA0050108	Silver	44,280	\$ 16,942,442	\$ 12,169,756	0.718	0.975	0.700	
16322PA0050111	Catastrophic	3,576	\$ 1,162,117	\$ 710,867	0.612	0.873	0.534	
16322PA0050112	Catastrophic	1,464	\$ 500,484	\$ 306,146	0.612	0.871	0.533	
16322PA0050113	Silver	44,280	\$ 16,708,175	\$ 11,800,984	0.706	0.961	0.679	
16322PA0050114	Silver	59,208	\$ 22,340,937	\$ 15,779,404	0.706	1.014	0.716	

Question 2

Plan ID	AV Pricing Value	Non-calibrated Plan Adjusted Index Rate	Ratio of AV Pricing Value to Plan ID Above	Ratio of PAIR to Plan ID Above
16322PA0040006	0.850	\$ 358.27		
16322PA0040007	0.847	\$ 356.98	0.996	0.996
16322PA0040008	0.833	\$ 351.20	0.984	0.984
16322PA0040010	1.052	\$ 443.18	1.262	1.262
16322PA0040012	1.785	\$ 752.12	1.697	1.697
16322PA0040024	0.742	\$ 312.78	0.416	0.416
16322PA0040025	0.849	\$ 357.62	1.143	1.143
16322PA0040026	0.646	\$ 272.11	0.761	0.761
16322PA0040027	0.823	\$ 346.79	1.274	1.274
16322PA0050029	0.709	\$ 298.60	0.861	0.861
16322PA0050030	0.706	\$ 297.52	0.996	0.996
16322PA0050031	0.695	\$ 292.71	0.984	0.984
16322PA0050033	0.877	\$ 369.37	1.262	1.262
16322PA0050035	1.488	\$ 626.86	1.697	1.697
16322PA0050100	0.588	\$ 247.81	0.395	0.395
16322PA0050101	0.619	\$ 260.69	1.052	1.052
16322PA0050102	0.674	\$ 283.85	1.089	1.089
16322PA0050103	0.671	\$ 282.83	0.996	0.996
16322PA0050104	0.660	\$ 278.25	0.984	0.984
16322PA0050105	0.672	\$ 283.34	1.018	1.018
16322PA0050106	0.833	\$ 351.13	1.239	1.239
16322PA0050107	1.414	\$ 595.90	1.697	1.697
16322PA0050108	0.707	\$ 298.06	0.500	0.500
16322PA0050111	0.512	\$ 215.59	0.723	0.723
16322PA0050112	0.538	\$ 226.79	1.052	1.052
16322PA0050113	0.686	\$ 289.03	1.274	1.274
16322PA0050114	0.686	\$ 289.03	1.000	1.000

Question	Comment/Request	Response
1	<p>Induced Utilization</p> <p>a. Please complete the table below for all plans, and confirm that the ratio in column (8) represents the AV and Cost Sharing for each plan in your filing.</p> <p>b. Please show quantitatively, including an Excel spreadsheet with formulas, the derivation of each, the AV and the cost sharing factors for each plan. Also, provide narrative that explains the derivation.</p> <p>c. Please provide justification for relative induced utilization assumptions in the Company's pricing that exceed the federal factors used in the risk adjustment model proving that morbidity is not reflected.</p> <p>d. Please confirm that each plan's induced utilization factor was normalized by an aggregate factor, and that the resulting sumproduct (against projected membership) produces a factor of 1.000. Please show the steps that demonstrate this.</p>	<p>a. Please see 'HO IND Work for Response to Objection 07-13-16' for the completed table.</p> <p>b. The AV values were determined using the 2017 HHS AV Calculator. In order to ensure that morbidity is not reflected in the induced utilization factors we calculated the factors using risk adjusted data. Utilization differences between plans can be attributed to both morbidity and induced demand. The Risk Adjustment program was designed to level out the differences in morbidity between plans. So when comparing loss ratios net of Risk Adjustment, any remaining inconsistencies between plans can be attributed to differences in induced demand. We calculated our loss ratios net of Risk Adjustment for metal levels that have credible data to be 98% for Silver and 103% for Gold plans. Since these are fairly close, we felt the induced demand factors currently used to help set the relativities between metal levels would be appropriate for continued use. So we kept them the same for 2017.</p> <p>c. In order to ensure that morbidity is not reflected in the induced utilization factors we calculated the factors using risk adjusted data. Utilization differences between plans can be attributed to both morbidity and induced demand. The Risk Adjustment program was designed to level out the differences in morbidity between plans. So when comparing loss ratios net of Risk Adjustment, any remaining inconsistencies between plans can be attributed to differences in induced demand. We calculated our loss ratios net of Risk Adjustment for metal levels that have credible data to be 98% for Silver and 103% for Gold plans. Since these are fairly close, we felt the induced demand factors currently used to help set the relativities between metal levels would be appropriate for continued use. So we kept them the</p>
2	Please show quantitatively that plan premiums are in proportion to the plan AV Pricing Values.	Please see 'HO IND Work for Response to Objection 07-13-16' for details.